

**FORM
INSP**Rev
X/20**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

08/23/2024

Submitted Date:

09/13/2024

Document Number:

696206219

FIELD INSPECTION FORMLoc ID 313257 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 10396

Name of Operator: SWN PRODUCTION COMPANY LLC

Address: P.O. BOX 12359

City: SPRING State: TX Zip: 77391-

Status Summary:

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

3 Number of Comments

1 Number of Corrective Actions

- ☒ Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

| Contact Name | Phone | Email | Comment |
|-------------------|-------|------------------------------|---------|
| Haverkamp, Curtis | | curtis.haverkamp@state.co.us | |
| | | Karen_Maneotis@swn.com | |
| Maxwell, Logan | | logan.maxwell@state.co.us | |
| | | liz_gee@swn.com | |
| | | swnsandwash@swn.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|-------------------|-------------|
| 282907 | WELL | TA | 01/24/2017 | GW | 081-07269 | BULL 11-8 | RI |
| 313257 | LOCATION | AC | | | - | BULL-66N92W 8NWNW | RI |

General Comment:

On 8/23/2024, Western Reclamation Work Lead Trujillo, and Reclamation Specialist Trujillo conducted a final reclamation inspection at SWN Production Company LLC's Bull 11-8 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816942 stating "Final Reclamation Complete"

It was observed in this inspection that reclamation has not been completed pursuant to 1004 requirements.

The following compliance issues were observed during this inspection:

- Final Reclamation of the Location and Access road
- Weeds

Refer to the Reclamation section of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspection that have not been addressed are still applicable.

| Inspected Facilities | | | | | | | | | |
|--|--------|-------|----------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 282907 | Type: | WELL | API Number: | 081-07269 | Status: | TA | Insp. Status: | RI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |
| Facility ID: | 313257 | Type: | LOCATION | API Number: | - | Status: | AC | Insp. Status: | RI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 | | | | | | | | | |

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

- 1003b. Area no longer in use? _____ Production areas stabilized ? _____
- 1003c. Compacted areas have been cross ripped? _____
- 1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
- Cuttings management: _____
- 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
- Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment _____

Corrective Action _____ Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged In _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation **Fail** Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: [See "COGCC Comments"](#)

Corrective Action: _____ Date **10/15/2024**

Conduct reclamation in accordance with 1004 rules including, but not limited to: removal of gravel, compaction alleviation and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.

Comply with Rule 1002.f and ensure erosion controls are implemented to stabilize the seeded soil. Comply with Rules 1004.e and 606.c: Oil and Gas Locations will be kept free of all Undesirable Plant Species. Ongoing stormwater and weed management required- continue to monitor and manage Location until Final Reclamation has passed.

Overall Final Reclamation

Fail

Well Release on Active Location ☐Multi-Well Location ☐**ECMC Comments**

| Comment | User | Date |
|---|------------|------------|
| <p>Pursuant to Form 6(s) Nos. 403143659 and 403688956, the dates for the Surface Plug Date, and the Cut Cap Date are both 7/19/2022: Pursuant to Rule 434.a.(5), Operators will not cap or seal the Well until 5 days after placing the last plug. Both Form 6s remain "in process" and well status shows "TA". Including ECMC Engineering on this inspection report for notification purposes. SWN is directed to contact area ECMC Engineer to resolve any potential outstanding issues related to plugging requirements or Form resolution.</p> <p>Pursuant to Rule 1004.a, All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and recontoured. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. All such reclamation work shall be completed within twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities.</p> <p>It was observed in this inspection that the Location has not been reclaimed in accordance with ECMC 1004 Rules. Reclamation work including removal of gravel, compaction alleviation and revegetation has not been performed along the access road and Location entrance. Vegetation within Location is predominantly Yellow Sweet clover, a biennial plant species. Noxious weeds (Scotch thistle) observed throughout the Location. It is noted that species planted within the non-cropland areas do not reflect species within the adjacent undisturbed reference areas, or vegetation that existed pre-disturbance; records show surface owner approved of the mix.</p> | trujilloam | 09/13/2024 |

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

| Document Num | Description | URL |
|--------------|-------------------|---|
| 696206220 | Inspection Photos | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706322 |