

**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:

696206215**FIELD INSPECTION FORM**Loc ID 311776 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC Operator Number: 10396Name of Operator: SWN PRODUCTION COMPANY LLCAddress: P.O. BOX 12359City: SPRING State: TX Zip: 77391-**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**4 Number of Comments1 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
		<u>liz_gee@swn.com</u>	
		<u>swnsandwash@swn.com</u>	
<u>Maxwell, Logan</u>		<u>logan.maxwell@state.co.us</u>	
		<u>Karen_Maneotis@swn.com</u>	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
<u>282912</u>	<u>WELL</u>	<u>PA</u>	<u>07/22/2022</u>	<u>GW</u>	<u>081-07273</u>	<u>BROOK 14-5</u>	<u>RI</u>
<u>311776</u>	<u>LOCATION</u>	<u>CL</u>			<u>-</u>	<u>BROOK-66N92W 5SWSW</u>	<u>RI</u>

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 BROOK #14-5 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816943 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:	282912	Type:	WELL	API Number:	081-07273	Status:	PA	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	311776	Type:	LOCATION	API Number:	-	Status:	CL	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 _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

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

Compaction alleviation _____ Dust and erosion control _____

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

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: [See "COGCC Comments"](#) Date **10/15/2024**

Overall Final Reclamation **Fail** Well Release on Active Location ☐ Multi-Well Location ☐

ECMC Comments

Comment	User	Date
<p>RECLAMATION COMMENTS</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. Culverts and any other obstructions that were part of the access road(s) shall be removed. 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 three (3) months on crop land and 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 been reclaimed to cropland within the western half, and non-cropland within the eastern half.</p> <p>It was observed in this inspection that the access road to the Location has not been reclaimed in accordance with ECMC 1004 Rules; areas of the Location have not achieved uniform vegetative establishment. Noxious weeds (Scotch thistle, Canada thistle, Common Mullein, Knapweed) 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> <p>Most recent crop planting appears to be Safflower. Crop vegetative establishment on the well location/disturbance area is not reflective of the reference area; there are areas where issues appear to exist that are hindering crop establishment; crop establishment is thin, growth is stunted, and not reflective of the crop established within adjacent off-site areas; compaction, remediation, or other issues may still exist within these areas.</p>	trujilloam	09/13/2024
<p>CORRECTIVE ACTIONS</p> <p>Conduct reclamation in accordance with 1004 rules at the Location/Road including, but not limited to removal of culverts/gravel material, compaction alleviation, recontour/regrading and establish vegetation with total perennial, non-invasive uniform plant cover of at least 80% of pre-disturbance or reference area levels (Road/noncropland). Determine the issues hindering crop production and collaborate with the surface owner to determine mitigating measures so reclamation work will be conducted in such a manner as to not interfere with Surface Owner's agricultural activities and crop production.</p> <p>Comply with Rule 1002.f and ensure erosion controls are implemented to stabilize the seeded soil.</p> <p>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 until Final Reclamation has passed.</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
403920583	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706330
696206216	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706321