

**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:

696206225

FIELD INSPECTION FORM

Loc ID: 313256 Inspector Name: Trujillo, Aaron On-Site Inspection: 2A Doc Num: _____

Status Summary:

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

Operator Information:

ECMC Operator Number: 10396
Name of Operator: SWN PRODUCTION COMPANY LLC
Address: P.O. BOX 12359
City: SPRING State: TX Zip: 77391-

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
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Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
282910	WELL	PA	07/23/2022	GW	081-07268	BROWN 21-8	RI
313256	LOCATION	CL			-	BROWN-66N92W 8NENW	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 BROWN #21-8 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816944 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/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: 282910 Type: WELL API Number: 081-07268 Status: PA Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 313256 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 REVEGETATION

Cropland

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 **Fail**

Gravel removed **Fail**

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

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

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:

Corrective Action:

Date **10/15/2024**

Conduct reclamation in accordance with 1004 rules at the Location/Road including, but not limited to removal of gravel material/culverts, 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. 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 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 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-cropland after plugging a well or final closure of associated production facilities.</p> <p>It was observed in this inspection that the access road to the Location, and the Location entrance has not been reclaimed in accordance with ECMC 1004 Rules, including, but not limited to, removal of gravel/culverts, compaction alleviation and revegetation. Signage remaining on the Location has not been maintained, and has been posted with the incorrect Operator information. Noxious weeds (Scotch thistle, Musk thistle) observed throughout the Location. Species planted do not reflect species within the adjacent undisturbed reference areas, or vegetation that existed pre-disturbance.</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
403920593	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706334
696206227	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706325