

**FORM  
INSP**Rev  
X/15**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:

01/15/2019

Submitted Date:

01/16/2019

Document Number:

682504411**FIELD INSPECTION FORM**
 Loc ID 427955 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 10396Name of Operator: SWN PRODUCTION COMPANY LLCAddress: PO 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:**14 Number of Comments3 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
		Sydney_Hansen@swn.com	
,		dnr_cogccenforcement@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
427974	WELL	PA	08/28/2015	OW	001-09740	Ewertz Farms 1-58 1-26P	RI

**General Comment:**

This is a follow-up final reclamation and stormwater inspection to doc. #682504013.

This Inspection is also a follow up for a 1001.c, 502.b reclamation variance request. See "COGCC Comments" for comments regarding the 502.b variance, or sundry doc. #401312312 for additional details

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	Inspection #682504013 documented Canada Thistle (Cirsium arvense) on the location. Thistle remains evident on location. This is a Colorado State listed noxious weed that needs to be managed. Inspection required operator to conduct weed management. This corrective action remains applicable.		
Corrective Action:	Canada thistle needs to be controlled at the appropriate time but no later than seedhead maturity in 2019 in accordance with 1003.f.	Date:	06/30/2019

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



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

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: DRY LAND

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? Fail Production areas stabilized ? Fail  
 1003c. Compacted areas have been cross ripped? Fail  
 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? Fail  
 Production areas have been stabilized? Fail Segregated soils have been replaced? Fail

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced Fail Recontoured Fail Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 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? FComment SEE "COGCC COMMENTS" FOR COMMENTS REGARDING INTERIM RECLAMATIONCorrective Action SEE "COGCC COMMENTS" FOR CORECTIVE ACTIONS REGARDING INTERIM RECLAMATIONDate 12/31/2018Overall Interim Reclamation Fail**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: DRY LAND

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: For the purpose of the SOVR, interim areas of the location will be subject to COGCC's 1004 reclamation requirements in order for final reclamation to pass.

Corrective Action: \_\_\_\_\_

Date \_\_\_\_\_

Overall Final Reclamation		Well Release on Active Location		Multi-Well Location		
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Waddles	Fail					Wood mulch wattle, South end of the pad
Blankets	Fail					Blanket at ditch on north
Gravel	Fail					Gravel on pad
Check Dams	Fail					Check dams w/in western
Seeding	Fail					Cut/fill slopes. Soil
Comment:	SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER					Date: 11/30/2018
Corrective Action:	A large majority of the stormwater concerns observed on location should be addressed during interim reclamation activities. Operator shall install and maintain temporary stormwater and erosion control BMPs on the location to mitigate any additional degradation from occurring to the location and sediment transport off site until interim reclamation has been conducted and more permanent controls (see reclamation) have been installed.					
Pits:	<input type="checkbox"/> NO SURFACE INDICATION OF PIT					

COGCC Comments		
Comment	User	Date
<p><b>COMMENTS REGARDING THE 502.B VARIANCE</b></p> <p>Operator submitted doc. Doc. #401312312 requesting a variance to waive select requirements of rule 1004.a. to not reclaim the access road, and ~4.6 acres of the well pad</p> <p>The Surface Owner Variance Request WAS approved with the following conditions:</p> <ol style="list-style-type: none"> <li>Operator shall conduct interim reclamation in accordance with COGCC's 1003 reclamation requirements. Operator will reduce the total area of disturbance for the location to 0.92 acres in size (including cut slopes, berms and stormwater controls) per the location's permitted 2A (document # 400252948) beginning at where the access road meets the pad. <ol style="list-style-type: none"> <li>The remaining pad left for the surface owner will need to be stabilized with either perennial vegetation that meets the 80% Rule 1004 standards or graveled, and permanent stormwater and erosion control BMPs will need to be implemented.</li> <li>All areas disturbed for oil and gas operations requiring interim reclamation shall be re-contoured/regraded and revegetated to an (80) percent perennial standard to that of a reference area set by COGCC rule 1004. <ol style="list-style-type: none"> <li>Collaborate with surface owner to determine final land use for areas subject to interim reclamation.</li> <li>Any cut/fill slopes remaining post interim reclamation will require vegetative stabilization. Vegetation will need to achieve the same eighty (80) percent perennial standards, to that of a reference area, as set by COGCC rule 1004.</li> </ol> </li> </ol> </li> <li>All corrective actions identified on a field inspection report must be performed by the corrective action date as a condition of approval for this variance until final reclamation is passed.</li> <li>Operator will continue to monitor and manage the site and access road for erosion and noxious weed control until final reclamation is passed.</li> </ol>	trujilloam	01/16/2019

<p><b>INTERIM RECLAMATION COMMENTS</b></p> <p>Inspection doc. #682504013, and "Conditions of Approval" (COA) per Surface Owner Variance Request sundry doc. #401312312, required operator to conduct interim reclamation and reduce the total area of disturbance for the location to 0.92 acres in accordance with COGCC's 1003 reclamation requirements beginning at where the access road meets the pad.</p> <p>No reclamation activities appear to have been conducted; disturbance area of the location has not been reduced and remains ~4.5 acres (not including access road). Vegetative stabilization activities do not appear to have been conducted on the cut/fill slopes. Location has not been stabilized. Stormwater issues remains (See "Stormwater Comments")</p> <p>Corrective actions from inspection #682504013, and COAs per sundry doc. #401312312 have not been addressed and remain applicable.</p>	trujilloam	01/16/2019	
<p><b>INTERIM RECLAMATION- CORRECTIVE ACTION</b></p> <p>Conduct interim reclamation in accordance with 1003 reclamation requirements, and reduce the area of disturbance for the location to 0.92 acres per 2A doc. #400252948 beginning at where the access road meets the pad. Ensure that the remaining pad left for the surface owner is stabilized with either perennial vegetation that meets the 80% Rule 1004 standard or graveled, and permanent stormwater and erosion control BMPs are implemented; BMPs will need to be monitored and maintained until final reclamation has passed in accordance with 1002.f(2).</p> <p>All areas disturbed for oil and gas operations requiring interim reclamation shall be recontoured/regraded and revegetated to an (80) percent perennial standard to that of a reference area set by COGCC rule 1004. Operator shall collaborate with surface owner to determine final land use for areas subject to interim reclamation.</p> <p>Any cut/fill slopes remaining post interim reclamation will require vegetative stabilization. Vegetation will need to achieve the same eighty (80) percent perennial standards, to that of a reference area, as set by COGCC rule 1004. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS and ensure erosion controls are implemented to stabilize areas with seeded soil.</p>	trujilloam	01/16/2019	

**STORMWATER COMMENTS**

trujilloam

01/16/2019

Stormwater erosion degradation concerns documented in inspection #682504013 have not been addressed; On going stormwater management does not appear to be occurring, and erosion degradation has been allowed to continue throughout the location.

Erosion degradation has continued and expanded throughout cut slopes on the eastern half of the location. Soil stockpile on the south end of the location remains bare and exposed soil; Large furrows previously documented perpendicular to the contour of the slope remain evident. Furrows have developed into rill and gully erosion degradation.

Gully erosion documented on the NE and SE corners of the pad remains evident.

The large gully within the ditch on the north end of the pad has not been repaired/stabilized/reclaimed; Stormwater runoff from the pad appears to have blown out areas of erosion control blankets and check dams / velocity checks in this section of the ditch. BMPs have not been repaired/maintained and stabilized or reclaimed.

Stormwater runoff within the ditch along the west end of the pad has continued to incise and cut underneath the pad itself creating sinkholes. The undercuts/sinkholes appear to exceed 10 feet in depth. There are now multiple areas within the ditch where this is occurring. BMPs have not been repaired/maintained and stabilized, or reclaimed.

Stormwater rill and gully erosion degradation documented within the ditch on the west end of the pad has not been repaired/stabilized and the cutting eastward into the pad has been allowed to continue.

Stormwater ditch on the western perimeter of the location remains filled with sediment has not been reclaimed and remains in improper functioning condition.

Operator has failed to install and maintain temporary and permanent stormwater and erosion control BMPs per corrective actions and COAs. Operator has failed to conduct sufficient and ongoing stormwater management in accordance with 1002.f

**Attached Documents**

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

Document Num	Description	URL
682504412	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4705339">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4705339</a>