

**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:

04/27/2022

Submitted Date:

05/06/2022

Document Number:

702800170

FIELD INSPECTION FORM

Loc ID 313315 Inspector Name: O'Malley, Anna 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:

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

Findings:

- 9 Number of Comments
- 6 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
,		swnsandwash@swn.com	All Inspections
Gee, Liz	281 900 7484	liz_gee@swn.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
313315	LOCATION	AC			-	Roundup 22-24ND	RI

General Comment:

On 04/27/2022, Reclamation Specialist O'Malley conducted an interim reclamation and stormwater inspection at SWN Production Company LLC's Roundup /22-24ND Location #313315 in Moffat County, Colorado.

The following compliance issues were observed during this inspection:

- Location signage with incorrect operator
- Equipment storage
- Stained soils
- Open casing
- Interim Reclamation not performed
- Noxious Weeds: scotch thistle, knapweed
- Seeding with aggressive non-native grasses
- Stormwater: rill and gully erosion on unstabilized slopes

Refer to the "Location," "Reclamation," "Stormwater" and "COGCC Comments" sections 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 inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location

Overall Good:

Signs/Marker:

Type	OTHER		
Comment:	Operator information incorrect on signs throughout Location (tanks, wellhead); signage requires updating to designate SWN Production Company LLC as Operator.		
Corrective Action:	Install signage with correct Operator to comply with Rule 605.a.	Date:	06/04/2022

Emergency Contact Number:

Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	Previous inspection, most recently #689805835 observed tubing stored at wellhead. Inspector required Operator to comply with Rule 606 by 6/25/2021. It was observed in this inspection that unused tubing is being stored on Location adjacent to wellhead. Original corrective action and date remain applicable.		
Corrective Action:	Compy with Rule 606.	Date:	06/25/2021

Overall Good:

Spills:

Type	Area	Volume		
Other				
Comment:	Impacted soils (approximately 5 by 5 foot area) observed adjacent to the tank battery.			
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition; control and contain spills/releases and clean up per Rule 912.a. and remediate to Table 915-1 Cleanup Concentrations; for non-E&P waste comply with Rules 906.a-d.		Date:	06/05/2022

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 313315 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

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? Fail

Comment It was observed in this inspection that there is an open casing/rat hole adjacent to the wellhead. The hole is a hazard to wildlife and workplace safety.

Corrective Action Implement safety BMPs to properly cover pipe.

Date 05/11/2022

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? Fail Production areas stabilized ? _____
 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? _____ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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? F

Comment Refer to "COGCC Comments" "INTERIM RECLAMATION COMMENTS"

Corrective Action **CORRECTIVE ACTION #1: Conduct interim reclamation on the Location per 1003 Rules including, but not limited to: gravel removal, compaction alleviation (cross ripping to a minimum depth of 18 inches), recontouring/regrading, replacement of topsoil, and revegetation activities; use a seed mixture provided by the surface owner, or a mixture prescribed by the local soil conservation district. Comply with Form 2A CPW/DOW COAs. (Refer to "INTERIM RECLAMATION COMMENTS"). Implement control measures to stabilize the seeded soil in accordance with Rule 1002.d.(2)C. CA date: 03/14/2012**
CORRECTIVE ACTION #2: Comply with Rule 1003.f and conduct weed management on the Location. CA date: 06/05/2022.

Date 03/14/2012

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

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

Final Land Use: RANGELAND

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:

Corrective Action:

Date _____

Overall Final Reclamation _____

Well Release on Active Location

Multi-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: It was observed in this inspection that BMPs to stabilize/protect the slopes of the Location are missing or insufficient; Rill erosion is present on fill slopes to the northeast and east and cut slopes to the west resulting in soil loss and stormwater degradation. Erosion on the fill slopes at the east of the Location is resulting in the formation of gullies.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C.

Date: 06/05/2022

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>INTERIM RECLAMATION COMMENTS</p> <p>It was observed in this inspection that interim reclamation has not been conducted on areas of the Location not necessary for production operations. COGCC Records show 09/14/2011 as the Date of First Production for the well (081-07336) on the Location; pursuant to Rule 1003.b, interim reclamation was required to be completed by 03/14/2012.</p> <p>Location is in a sensitive wildlife habitat area. Per CPW consultation, Form 2A #400156119, Operator agreed to COAs including but not limited to:</p> <ul style="list-style-type: none"> - Avoid aggressive non-native grasses and shrubs in mule deer and elk habitat restoration - Reclaim mule deer and elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed <p>It was observed in this inspection that smooth brome (aggressive non-native grass) is present throughout Location. Crested wheatgrass, an often seeded, non-native grass species is also present. Noxious weeds observed throughout the Location including scotch thistle and knapweed (CO List B Noxious Weeds) and cheatgrass (CO List C Noxious weed).</p>	omalleya	05/06/2022

Attached Documents

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

Document Num	Description	URL
702800171	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5747407