

**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:

08/21/2024

Submitted Date:

09/05/2024

Document Number:

696206167

**FIELD INSPECTION FORM**Loc ID 313148 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:**

6 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
, SWN		swnsandwash@swn.com	<a href="#">All Inspections</a>
Maneotis, Karen		Karen_Maneotis@swn.com	<a href="#">All Inspections</a>
Gee, Elizabeth	(832) 796-2873	liz_gee@swn.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
262676	WELL	PA	06/25/2022	GW	081-07081	WALKER 12-3	RI
313148	LOCATION	CL			-	WALKER 7-93-12 PAD3	RI

**General Comment:**

On 8/21/2024, Reclamation Specialist Trujillo conducted a final reclamation inspection at SWN Production Company LLC's WALKER #12-3 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816934 stating "Final Reclamation is 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:

- Access road has not been reclaimed
- Utility and riser equipment remaining
- 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:	262676	Type:	WELL	API Number:	081-07081	Status:	PA	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	313148	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 \_\_\_\_\_

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 \_\_\_\_\_

Gravel removed **Fail**

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

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" at the end of this report.](#)

Corrective Action: \_\_\_\_\_ Date **10/15/2024**

<p>Conduct reclamation in accordance with 1004 rules at the Locations/Road including, but not limited to, removal of surface equipment and gravel; perform compaction alleviation, recontour/regrade and establish vegetation with total perennial, non-invasive uniform plant cover of at least 80% of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district.</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.</p> <p>Ongoing stormwater and weed management required until Final Reclamation has passed.</p>		
Overall Final Reclamation	Fail	
Well Release on Active Location	<input type="checkbox"/>	
Multi-Well Location	<input type="checkbox"/>	

ECMC Comments		
Comment	User	Date
<p>Pursuant to Rule 1004.a, all debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well. 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 access road to the Location has not been reclaimed in accordance with ECMC 1004 Rules. Within areas of the access road where work is evident (road at location entrance), Operator appears to have only pushed/dumped/placed soil on top of the road, and then seeded into the placed soils; gravel/compaction evident beneath the placed soils. It was also observed that species planted do not reflect species within the adjacent undisturbed reference areas, or vegetation that existed pre-disturbance. Additionally, utility equipment on, and leading to the Location has not been removed, and a riser remains on the south end of the Location adjacent to the road. Noxious weeds (Scotch thistle) observed established on the Location.</p>	trujilloam	09/05/2024

Attached Documents

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

Document Num	Description	URL
696206168	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6695038">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6695038</a>