



STATE OF COLORADO

Trujillo - DNR, Aaron <aaron.trujillo@state.co.us>

Resolution for recent reclamation inspections for Moffat County

1 message

Trujillo - DNR, Aaron <aaron.trujillo@state.co.us>

Wed, Sep 18, 2024 at 10:17 AM

To: Karen Maneotis <Karen_Manerotis@swm.com>

Cc: Denise Arthur - DNR <denise.arthur@state.co.us>, Liz Gee <liz_gee@swm.com>

Good Morning Karen,

I have received several "Corrective Action Completed" Resolutions for Final Reclamation inspections I performed at the end of August. Below is an example of the comments I'm seeing included within the FIRR:

<p>Conduct reclamation in accordance with 1004 rules including, but not limited to: removal of gravel, removal of surface equipment, removal of debris, compaction alleviation, recontour/grade and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.</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- continue to monitor and manage Location until Final Reclamation has passed.</p>
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Response: CA COMPLETED Date of Completion: 09/12/2024

Operator Comment:	The owner wants to keep all graveled roads. Weed spraying and reseeding was successfully completed in June 2024. However, due to unforeseen circumstances, including unusually dry conditions and lack of rainfall, weeds reemerged before a scheduled inspection. Given the approaching change in season, reapplying the spray before spring of 2025 would be inefficient. The land owner has requested that the gravel remain on site. The power poles seen on the edge of pad do not belong to pad and all signage has been removed.
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Please be aware, I will not be approving any "CA Complete" resolutions submitted with the information in the example above, for the reasons detailed below:

- The Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on SWN's comments, the corrective actions have not been completed.
- As stated within the inspections, all surface equipment is required to be removed, and all access roads to O&G Locations are required to be reclaimed.
 - These corrective actions will remain applicable. Additionally, the Utility equipment is associated with the Location(s) and Oil Gas production operations, is considered surface equipment and will require removal.
- Weed management efforts are required to be ongoing until the Location's receive a passing Final Reclamation Inspection.
 - It is noted that several of the Noxious Weed species observed (Scotch thistle) are biennial forbs that exist as rosettes throughout the first year, with flowering stems developing during the second year. The abundance of mature plants observed indicates to myself, and my Supervisor, that ongoing Noxious Weed monitoring and management efforts have been insufficient during the past two years (2023 and 2024 growing seasons) on the Locations.

Regards,

Aaron Trujillo

Western Reclamation Work Lead



COLORADO Energy & Carbon Management Commission

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