

**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:

11/16/2022

Submitted Date:

11/21/2022

Document Number:

702800948

FIELD INSPECTION FORMLoc ID 428927 Inspector Name: O'Malley, Anna On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC 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:

16 Number of Comments

10 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
Galloway, Kelly		kgallowaywerc@gmail.com	All Inspections
Stepp, Sarah		wccassistant@gmail.com	All Inspections
Pate, James		jspconcrete@yahoo.com	All Inspections
Gee, Elizabeth	(832) 796-2873	liz_gee@swn.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428927	LOCATION	AC			-	Bulldog 5-31H-790	RI
428928	WELL	SI	01/01/2022	GW	081-07727	Bulldog 5-31H-790	RI

General Comment:

On 11/16/2022, Reclamation Specialist O'Malley conducted a reclamation and stormwater inspection at Beeman Oil & Gas LLC's Bulldog /5-31H-790 Location #428927 in Moffat County, Colorado.

This is a follow up to inspection #702800205. Corrective actions from previous inspections have not been addressed.

The following compliance issues were observed during this inspection:

- Well API number not observed on well sign
- Well API number not observed on tank battery sign
- Unused equipment
- Unused risers
- Stained soils
- Wildlife protection BMPs missing/insufficient
- Unmarked guy line anchors
- Interim reclamation not performed
- Noxious weeds
- Stormwater: erosion of cut slope & perimeter ditch

Refer to the "Location," "Reclamation," and "Stormwater" 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.

LocationOverall Good: ☐**Signs/Marker:**

Type	BATTERY		
Comment:	Sign not posted or information inaccurate at battery; no API number.		
Corrective Action:	Install sign to comply with Rule 605.e.	Date:	01/20/2023
Type	WELLHEAD		
Comment:	Sign not posted or information inaccurate at well(s); no API number.		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	01/20/2023

Emergency Contact Number:

Comment: (970) 210-2896

911

Corrective Action:

Date:

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment observed. Corrective action and date from previous inspection #689806151 remain applicable.		
Corrective Action:	Comply with Rule 606.	Date:	09/06/2021
Type	OTHER		
Comment:	Stained soils observed throughout the location. Corrective action and date from previous inspection #689806151 remain applicable.		
Corrective Action:	Comply with Rule 606. Properly dispose of oily waste in accordance with 905.e.	Date:	08/19/2021
Type	UNUSED EQUIPMENT		
Comment:	Inspection #689801364 observed: Flowline risers not LO/TO or marked are considered unused equipment. 1 - 1" and 1 - 2" steel risers at 40.59939, -107.51106 2- 1" and 3 - 2" steel risers at 40.59981, -107.51155 1 - 1" steel riser at battery; none marked for abandonment or LOTO. It was observed in this inspection that the previously observed risers remain. Risers are not Locked out tagged out or marked and are considered unused equipment. Original corrective action and date remain applicable.		
Corrective Action:	Comply with Rule 606; remove all unused risers.	Date:	07/16/2018

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

Type: Other	#		corrective date
Comment:	BMPs to prevent wildlife (including, but not limited to birds and bats) access to the secondary containment stock tank(s) are missing or insufficient. Original corrective action and date from inspection #702800205 remain applicable.		
Corrective Action:	Install or repair wildlife protection equipment.	Date:	05/21/2022
Type: Other	#		

Comment:	A bucket containing an oily fluid was observed within the shed at the southwest of the location. No measures were implemented to prevent the bucket from spilling and releasing the oily fluid. No measures were implemented to prevent wildlife from entering the bucket. A dead small mammal was observed within the bucket. Failure to prevent wildlife mortality in the future will result in enforcement action.		
Corrective Action:	Install or repair wildlife protection equipment. Install or repair spill prevention equipment	Date:	11/23/2022

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities								
Facility ID:	428927	Type:	LOCATION	API Number: -	Status:	AC	Insp. Status:	RI
Facility ID:	428928	Type:	WELL	API Number: 081-07727	Status:	SI	Insp. Status:	RI

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? Fail

Comment

At least one (1) guy line anchor was observed to be in disrepair. Corrective action and date from inspection #702800205 remain applicable.

Corrective Action

Mark or remove all guy line anchors per Rule 1003.a.

Date **05/30/2022**

1003b. Area no longer in use? Fail Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? Fail

1003d. Drilling pit closed? Pass Subsidence over on drill pit? Pass

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 REVEGETATIONCropland

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

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

#1: 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 11/27/2012 as the Date of First Production for the well (081-07727) on the Location; pursuant to Rule 1003.b, interim reclamation was required to be completed by 05/27/2013.

#2: List B Noxious Weeds Canada and bull thistle are widespread on the Location including on cut and fill slopes, perimeter berms, the soil stockpile and production area. No evidence of weed management. Weed management required in 2023 growing season. Original corrective action and date from document #702800205 remain applicable.

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. Implement control measures to stabilize the seeded soil per Rule 1002.f. CA date: 05/27/2013.

CORRECTIVE ACTION #2: Comply with Rule 1003.f and conduct weed management on the Location to prevent further establishment and spread of CO State List B Noxious Weeds; ongoing weed management required until site passes final reclamation. CA date: 05/30/2022.

Date 05/27/2013

Overall 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: _____

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: Previous inspection #702800205 observed that BMPs to stabilize/protect the cut slopes of the Location are missing or insufficient...Additionally, 2 access road culverts and 1 Location drainage pipe to the west of the Location which drain into a perimeter stormwater ditch are causing degradation to the Location and adjacent areas. Refer to inspection #702800205 for more detail.

It was observed in this inspection that previously observed erosion remains, although erosion is covered in snow at the time of this inspection, it is still evident. No evidence the corrective action has been addressed. Original corrective action and date remain applicable.

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

Date: 06/16/2022

Pits: ☒ NO SURFACE INDICATION OF PIT**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/webblink/>) and search by document number:

Document Num	Description	URL
403236814	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5922418
702800951	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5922414