

**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:

05/17/2022

Submitted Date:

05/24/2022

Document Number:

702800250

FIELD INSPECTION FORM
 Loc ID 312924 Inspector Name: O'Malley, Anna On-Site Inspection ☐ 2A Doc Num:
Operator Information:

OGCC Operator Number: 44645

Name of Operator: JETTA OPERATING COMPANY INC

Address: 640 TAYLOR ST #2400

City: FT WORTH State: TX Zip: 76102

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

6 Number of Comments

2 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
Bart Trevino		btrevino@jettaoperating.com	Principle Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
222857	WELL	PA	08/13/2018	OW	081-06217	CRAIG 1-7	RI
312924	LOCATION	CL			-	CRAIG-66N90W 7NENW	RI

General Comment:

On 05/17/2022, Reclamation Specialist O'Malley conducted a reclamation inspection at Jetta Operating Company Inc's Craig-66N90W /7NENW Location #312924 in Moffat County, Colorado.

This inspection is a follow up to Nos. 692401623, 692403503 and 696202948.

This inspection is in response to document #402869427 indicating: Final reclamation complete, site ready for inspection.

The following compliance issues were observed during this inspection:

- 606.c: Undesirable Plant Species
- 1004.a: Final Reclamation
- 207: Inaccurate reporting in doc #402869427

Refer to the "Location," "Reclamation" 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.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	<p>Previous inspection #696202948 observed weeds present throughout the reclamation areas of the Location. Inspector required Operator to keep Location free of all Undesirable Plant Species. No FIRR has been submitted indicating the corrective action has been addressed as is required per Rule 210.</p> <p>It was observed in this inspection that weeds designated as Undesirable Plant Species (Kochia sp., Salsola sp.) and noxious (cheatgrass and bulbous bluegrass) are established throughout the reclamation areas of the Location.</p>		
Corrective Action:	Comply with Rule 606.c and keep Location free of all Noxious and Undesirable Plant Species.	Date:	05/31/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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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:	222857	Type:	WELL	API Number:	081-06217	Status:	PA	Insp. Status:	RI
Facility ID:	312924	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI

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 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? _____ 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 REVEGETATIONCropland

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 Pass Pit mouse/rat holes, cellars backfilled Pass

Debris removed Pass 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 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: Refer to the "COGCC Comments" section for "FINAL RECLAMATION COMMENTS"

Corrective Action: Remove the gravel pile located at the northeast of the Location and reclaim this area. Assess vegetation and site conditions. Apply remedies /conduct reclamation activities needed, as indicated by assessment to ensure the uniform establishment across the site of desirable vegetation. Reclamation Activities to be complete by November 15, 2022. Date 11/15/2022

Overall Final Reclamation	Fail	Well Release on Active Location		Multi-Well Location	
COGCC Comments					
Comment	User		Date		
Operator submitted Form 4 Sundry Notice #402869427 on 11/16/2021 indicating "Final reclamation complete, site ready for inspection." Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.	omalleya		05/24/2022		
It was observed in this inspection that the site has not reached 80% coverage. Final Reclamation is not complete per 1004 Rules. Operator is out of compliance with Rule 207 requirements for accurate reporting.					
FINAL RECLAMATION COMMENTS	omalleya		05/23/2022		
It was observed in this inspection that final reclamation is not complete per 1004 Rules.					
A large pile of gravel is present at the northeast of the Location. The gravel pile must be removed and the area reclaimed for the site to meet 1004 standards. Vehicle tracks are widespread in the eastern area and soils are heavily compacted. Soil penetration with a shovel was very difficult and only possible to approximately 1/2 inch in depth. The northeastern areas are almost entirely bare ground. It is the responsibility of the Operator to restrict travel on reclaimed areas to achieve revegetation.					
Revegetation at the southeast of the Location has failed, and is dominated by the annual weeds kochia, purple mustard and cheatgrass (CO List B Noxious Weed).					
The western reclamation area shows some germination of perennial grasses. Large areas where germination has failed are present and kochia dominates perennial plant interspaces.					
This Location has not achieved 80% similarity with reference areas due to poor perennial grass germination, dense coverage with annual weeds, large patches of bare ground and the presence of a gravel pile.					

Attached Documents

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

Document Num	Description	URL
702800260	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5761709