

**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.

**Location**Overall 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 \_\_\_\_\_

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 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	
FINAL RECLAMATION COMMENTS	omalleya			05/23/2022	
<p>It was observed in this inspection that final reclamation is not complete per 1004 Rules.</p> <p>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.</p> <p>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).</p> <p>The western reclamation area shows some germination of perennial grasses. Large areas where germination has failed are present and kochia dominates perennial plant interspaces.</p> <p>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.</p>					
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	
<p>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.</p>					

**Attached Documents**

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

Document Num	Description	URL
403057790	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5761710">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5761710</a>
702800260	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5761709">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5761709</a>