

**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:

08/14/2023

Submitted Date:

08/15/2023

Document Number:

696205158

FIELD INSPECTION FORMLoc ID 414116 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10132

Name of Operator: GENESIS GAS & OIL LLC

Address: 1701 WALNUT STREET - 4TH FL

City: KANSAS CITY State: MO Zip: 64108

Status Summary:

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

Findings:

5 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
		j75rober@blm.gov	
		mkimmel@genesisgoco.com	
		dnr_cogccenforcement@state.co.us	
		jkarcz@genesisgoco.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
413020	WELL	EP	04/10/2016	LO	103-11565	FGSU 4-41 WD	RI
414116	LOCATION	AC			-	FLETCHER GULCH 4-41	RI

General Comment:

On 8/14/2023, Reclamation Specialist Trujillo Inspected Genesis Gas & Oil Colorado LLC's FGSU 4-41 WD location in Rio Blanco County, Colorado.

This inspection is a followup-up to #696203802 and #696204895 to document compliance with the following Corrective Actions:

-Final Reclamation
-Stormwater

This inspection is also in response to NOAV #403440851; unable to find record that an "Answer" has been filed by Operator in response to the NAOV, pursuant to Rule 523.c.(2).

It was observed in this inspection that the Location remains out of compliance with ECMC Rules, Corrective Actions and NOAV Requirements.

Refer to the "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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

Inspected Facilities									
Facility ID:	413020	Type:	WELL	API Number:	103-11565	Status:	EP	Insp. Status:	RI
Facility ID:	414116	Type:	LOCATION	API Number:	-	Status:	AC	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? Fail Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? Fail

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? Fail

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 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? _____

Comment _____

Corrective Action _____ Date _____

Overall Interim Reclamation Fail

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 Fail

Gravel removed _____

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

Compaction alleviation Fail Dust and erosion control Fail

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: [See "COGCC Comments" at the end of this report.](#)

Corrective Action: Comply with Rule 1004.a and conduct final reclamation on the Location and access road. Date 09/15/2022

Overall Final Reclamation Fail 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
	Fail		Fail			

Comment: [See "COGCC Comments" at the end of this report.](#)

Corrective Action: **Comply with Rule 1002.f. Install or repair required stormwater and erosion control BMPs at the Location and access road; temporary controls required until final reclamation work is performed, at which time additional BMPs will be required until long-term stabilization (such as revegetation) of the disturbances have been achieved. BMPs are required to be installed in accordance with Good Engineering Practices, and maintained in proper functioning condition at all times.**

Stormwater management required until final reclamation is achieved pursuant to 1004 Rules.

Date: 05/04/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>RECLAMATION COMMENT</p> <p>All Form 2 and Federal "permits to drill" on file for the Location have expired:</p> <p>-Form 2 #400473086 expired 4/10/2016. -Federal APD (doc. no 1828336) expired 7/31/2010.</p> <p>Inspection #696203802 and #696204895 observed that the Location has been constructed, and various surface equipment (pipe, risers, cellars) have been installed at the Location and along the access road; no wells have been drilled; work to maintain the Location and access road has not occurred. Location subject to Final Reclamation Requirements; inspection required Operator to comply with Rule 1004.a by 9/15/2022.</p> <p>NOAV #403440851 was issued 6/21/2023 requiring Operator to comply with ECMC 1004 Rules and conduct final reclamation.</p> <p>It was observed in this inspection that final reclamation of the Location and access road has not been conducted; Location/Access road has not been decompacted, recontoured/regraded and reclaimed; Surface equipment along the road/Location has not been removed; Culverts remain along the access road and drainages have not been restored; Access road has continued to degrade.</p> <p>Original corrective action and date remains applicable: Submission of additional permits does not waive compliance with 1004 requirements- See "Notice to Operators: Interim Reclamation Procedures for Delayed Operations" dated January 5, 2017.</p>	trujilloam	08/15/2023

STORMWATER COMMENT

trujilloam

08/15/2023

Inspection #696204895 observed that stormwater management on the Location and access road is inadequate:

-BMPs to minimize erosion, degradation and off-site sediment transport are missing or insufficient on the Location and access road; slopes lack stabilization; Runoff is resulting in gully erosion on Location, and within ruts of the access road (both the access road leading to the Location, and the access road leading to, and traveling parallel with Fletcher Gulch); runoff and stabilization controls at road inadequate; Stormwater management required until final reclamation is achieved pursuant to 1004 Rules.

It was observed in this inspection that stormwater and erosion control measures on the Location and access road remains inadequate- unable to find evidence that work to address the CA has been performed; erosion and degradation has persisted.

Attached Documents

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

Document Num	Description	URL
403497997	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6219848
696205159	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6219826