

**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:

696205164

FIELD INSPECTION FORMLoc ID 413497 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
		jkarcz@genesigoco.com	
		j75rober@blm.gov	
		dnr_cogccenforcement@state.co.us	
		mkimmel@genesigoco.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
413013	WELL	EP	04/10/2016	LO	103-11571	FGSU 9-14	RI
413497	LOCATION	AC			-	FLETCHER GULCH 9-14	RI

General Comment:

On 8/14/2023, Reclamation Specialist Trujillo Inspected Genesis Gas & Oil Colorado LLC's FGSU 9-14 location in Rio Blanco County, Colorado.

This inspection is a followup-up to #696203808 and #696204901 to document compliance with the following Corrective Actions:

- Final Reclamation
- Stormwater Management

This inspection is also in response to NOAV #403440906 requiring compliance with 1004 Rules; 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 tha the Location remains out of compliance with ECMC Rules, Corrective Actions and NOAV requirements.

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:	413013	Type:	WELL	API Number:	103-11571	Status:	EP	Insp. Status:	RI
Facility ID:	413497	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? _____

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 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**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 Fail

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% 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: [See "COGCC Comments".](#)

Corrective Action: [Comply with Rule 1004.a and conduct final reclamation on the Location and access road.](#) Date **09/15/2022**
[Comply with Rule 1004.e/606.c.](#)

Overall Final Reclamation	Fail	Well Release on Active Location	<input type="checkbox"/>	Multi-Well Location	<input type="checkbox"/>
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Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See "COGCC Comments".](#)

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.**

Date: 05/04/2023

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

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; Form 2 #400473210 expired 4/10/2016, Federal APD (doc. no 1828411) expired 7/31/2010.</p> <p>Previous inspections 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; inspections required Operator to comply with Rule 1004.a by 9/15/2022.</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/reggraded and reclaimed. Surface equipment along the road/Location has not been removed. Culverts along the access road remain, drainages have not been restored; Access road has continued to degrade. Undesirable Plant Species (Tamarisk, Halogeton) also observed established on the Location and access road; ongoing weed management required on Location and access road until Location receives a passing final reclamation inspection.</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

STORWMATER COMMENT

trujilloam

08/15/2023

Previous inspection observed that stormwater management on the Location and access road is inadequate:

-Unstabilized/unmaintained slopes have resulted with rock-falls onto the access road; Location was inaccessible by vehicle. Imminent safety issues also exist due to the unstable boulders and rocks observed on the disturbed slopes.

-BMPs to minimize erosion, degradation and off-site sediment transport are missing or insufficient on the Location and access road. Runoff is resulting in gully erosion within ruts of the road; runoff and stabilization controls at road inadequate. Cut slopes lack stabilization.

It was observed in this inspection that corrective actions to comply with Rule 1002.f have not been taken by the Operator; Location remains inaccessible by vehicle due to rock-falls on the road; Cut slopes of the Location and access road remain unstabilized. Erosion degradation on Location and access road 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
403498013	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6219859
696205165	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6219829