

**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:

02/10/2023

Submitted Date:

02/21/2023

Document Number:

697504503**FIELD INSPECTION FORM**Loc ID 462908 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10701Name of Operator: UPLAND EXPLORATION LLCAddress: 424 S MAIN STCity: BOERNE State: TX Zip: 78006**Status Summary:**

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

Findings:9 Number of Comments6 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
		david@uplandexploration.com	
		larry@uplandexploration.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
462911	WELL	PR	07/01/2021	OW	123-49873	Little Lady 21-5NH	RI
462913	WELL	PR	07/01/2021	OW	123-49875	Little Lady 21-3NH	RI
480996	TANK BATTERY	AC	10/28/2021		-	21-11N-64W NESE Little Lady 21 TB	RI

General Comment:

On 2/10/2023, Reclamation Specialist Chris Binschus and Reed Wold conducted an Interim Reclamation and Stormwater inspection at the Upland Exploration LLC Little Lady 21/North Well Pad location in Weld County, Colorado.

The following compliance issues were observed during this inspection:

- 1) 1003 Interim Reclamation
- 2) 1002.c Protection of soil
- 3) 606.a Unused equipment
- 4) 606.c. Weeds
- 5) 606.d. Trash
- 6) 912. Spills and Releases

Refer to the Good Housekeeping, Equipment, Environmental, Reclamation, and COGCC Comment sections of this inspection report for additional details.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	Storage of supplies and chemicals were observed on location. Operator has failed to prohibit the storage of supplies and chemicals on location. Refer to Photos 7-11.		
Corrective Action:	Comply with Rule 606.a. The corrective action date is the date the location was observed out of compliance.	Date:	02/10/2023
Type	TRASH		
Comment:	Trash/debris was observed throughout the location. Operator has failed to properly contain and remove trash. Refer to Photos 6-11.		
Corrective Action:	Comply with Rule 606.d. The corrective action date is the date the location was observed out of compliance.	Date:	02/10/2023
Type	WEEDS		
Comment:	Weeds were observed along the eastern perimeter of location and around the wellhead area. Operator has failed to control and manage weeds to prevent weed waste and prevent seeds from spreading onto adjacent lands. Refer to Photos 6-7, 10.		
Corrective Action:	Comply with Rule 606.c. The corrective action date is the date the location was observed out of compliance.	Date:	02/10/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

Operator has left a hose hooked up which could contribute to a potential spill. Operator should unhook the hose from the connection. Refer to Photo 14.

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>462911</u>	Type:	<u>WELL</u>	API Number:	<u>123-49873</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>462913</u>	Type:	<u>WELL</u>	API Number:	<u>123-49875</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>480996</u>	Type:	<u>TANK</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment:

Stained soil throughout the western location was observed, mainly around the compressors. Operator has failed to properly remove and/or remediate stained soil. Refer to Photo 12.

Corrective Action:

Control and contain spills/releases and clean up per Rule 912.a. The corrective action date is the date the location was observed out of compliance.

Date: 02/10/2023

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

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 _____ Fail _____

Comment

The topsoil stockpile is bare and has weedy vegetation with no perennial vegetation establishment that would out compete the weeds. One of the benefits of perennial vegetation is that it serves to stabilize the soils.

Operator has failed to prevent weed establishment on the topsoil stockpile at the location. Refer to Photo 15.

Corrective Action

Comply with Rule 1002.c.

Date **02/10/2023**

The corrective action date is the date the location was observed out of compliance.

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? 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 _____ 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 **This location does not comply with Rule 1003.b. Operator has failed to perform interim reclamation to reduce disturbance areas only reasonably needed for production operations. Both of the producing wells went onto production back on May 2021; therefore, interim reclamation should have been completed by November 2021. This location is over a year out of compliance.**

In addition, Operator refiled Form 2's for the remaining wells back on May 2021, which had a Condition of Approval (COA) to comply with the Notice to Operators: Interim Reclamation Procedures for Delayed Operations (dated January 5, 2017).

Operator has failed to perform interim reclamation and has failed to comply with a permit COA. Refer to Photos 2-5.

Corrective Action **Comply with Rule 1003.b.**

Date **02/10/2023**

The corrective action date is the date the location was observed out of compliance.

Overall Interim Reclamation **Fail**

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

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 ☐

COGCC Comments

Comment	User	Date
COGCC Staff, Chris Binschus, emailed the Operator on February 16, 2023 to communicate this inspection would not be submitted until February 21, 2023. Staff outlined the observed violations as a heads-up for getting corrective actions resolved.	binschusc	02/21/2023
COGCC Summary: The location and access road contain High Priority Habitat for big game species. The neighboring Pawnee National Grassland, State Land Board and private land support a number of flora and fauna, including grazing operations. The violations observed threatens the public health, safety, welfare, the environment and wildlife resources.	binschusc	02/21/2023

Attached Documents

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

Document Num	Description	URL
697504504	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6028449