

**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
		<u>larry@uplandexploration.com</u>	
		<u>david@uplandexploration.com</u>	

**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.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

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
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

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:	462911	Type:	WELL	API Number:	123-49873	Status:	PR	Insp. Status:	RI
Facility ID:	462913	Type:	WELL	API Number:	123-49875	Status:	PR	Insp. Status:	RI
Facility ID:	480996	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	RI

**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 \_\_\_\_\_

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 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

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
<b>COGCC Summary:</b>  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
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

### **Attached Documents**

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

Document Num	Description	URL
403326388	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6028459">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6028459</a>
697504504	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6028449">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6028449</a>