

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

04/07/2023

Submitted Date:

04/13/2023

Document Number:

697504595

## FIELD INSPECTION FORM

 Loc ID 456651 Inspector Name: Binschus, Chris On-Site Inspection  2A Doc Num:
**Status Summary:**

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

**Findings:**

- 13 Number of Comments  
 9 Number of Corrective Actions  
 Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM  
 PREVIOUS INSPECTIONS THAT HAVE NOT  
 BEEN ADDRESSED ARE STILL APPLICABLE**

**Operator Information:**
 OGCC Operator Number: 10701  
 Name of Operator: UPLAND EXPLORATION LLC  
 Address: 424 S MAIN ST  
 City: BOERNE State: TX Zip: 78006
**Contact Information:**

Contact Name	Phone	Email	Comment
		aaron.trujillo@state.co.us	
		dnr_cogccenforcement@state.co.us	COGCC Enforcement
		dustin@uplandexploration.com	
		david@uplandexploration.com	
Adamczyk, Megan		megan.adamczyk@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
456651	LOCATION	AC			-	Salt Ranch Fee 18 East	RI

**General Comment:**

On 4/7/2023, Reclamation Specialist Chris Binschus and Reclamation Supervisor Denise Arthur performed a follow up inspection which was also in response to new complaints submitted on 3/29/2023 regarding property damage and dust. COGCC staff met with an Operator representative, Dustin Rollins.

Refer to the Lease Road, Good Housekeeping, Equipment, Complaint, Environmental, Reclamation, and Stormwater sections of this inspection report for additional details.

COGCC issued a NOAV on 3/16/2023 (Doc.# 403347572). Note- this inspection does not address all of the violations issued in the NOAV.

Location			
<b>Lease Road:</b>			
Type	Main		
comment:	<p>At the time of this inspection, a water truck was observed watering the access road to attempt to mitigate fugitive dust. Water trucks can be effective; however, in this situation the water truck is not sufficient in mitigating fugitive dust from Operator truck traffic. Operator did mention alternative methods (magnesium chloride) were being looked into.</p> <p>Operator has failed to minimize fugitive dust and the current BMP (watering truck) is not adequate to control dust. Refer to Photo 17.</p>		
Corrective Action:	Comply with Rule 427.b	Date:	02/28/2023
	The prior Corrective Action remains in effect and remains out of compliance.		

Overall Good:

Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: _____

Good Housekeeping:			
Type	TRASH		
Comment:	<p>The location was in better condition with regards to trash; however, trash was observed within the stormwater BMP areas and off location.</p> <p>Operator has failed to properly contain trash. Operator allowed trash to remain on the ground and some of which has blown off location. Refer to Photos 9 and 14.</p>		
Corrective Action:	Comply with Rule 606.d.	Date:	02/10/2023
	The prior Corrective Action remains in effect and remains out of compliance.		
Type	UNUSED EQUIPMENT		
Comment:	<p>Operator has left a hose hooked up which could contribute to a potential spill. Operator shall unhook the hose from the connection and remove the hose from the secondary containment. No equipment shall be stored inside secondary containment. Refer to Photo 13.</p> <p>Note- COGCC staff communicated this observation to the Operator the day of the inspection.</p>		
Corrective Action:	Comply with Rule 606.	Date:	04/07/2023
	The corrective action date is the date the location was observed out of compliance.		
Type	WEEDS		
Comment:	<p>Operator has a crew raking weed debris from the ditch areas off the access road and being put into a covered trailer. Weed debris from the access road and within the location are observed and in process of completion. Refer to Photos 7-8, 10-11.</p>		
Corrective Action:	Comply with Rule 606.c.	Date:	02/10/2023
	The prior Corrective Action remains in effect and remains out of compliance.		

Overall Good:

Spills:			
Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		

Comment:	Wildlife protection devices (netting) are missing from an open bucket with oil. Refer to Photo 12. Note- COGCC staff communicated this observation to the Operator the day of the inspection.		
Corrective Action:	Comply with Rule 902.b to install wildlife protection equipment, and properly dispose fluids from within the bucket.  The corrective action date is the date the location was observed out of compliance.	Date:	04/07/2023

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 456651 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Complaint**

Comment: [Complaint: # 403359546 and 403360137](#)  
[Field Inspector Assigned: Chris Binschus](#)  
[Location ID: #456651](#)  
[Inspection Document: #697504595](#)  
 Nature of complaint: The first complaint (403359546) states the Operator continues to drive out into the pasture off the access road, widening the road, plowing through access road erosion barriers and not monitoring contractors. The second complaint (403360137) states contractors are not following speed limits and causing dust.

Corrective Action:

Date:

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Operator has submitted a Form 19. However, surface spills were still observed on the working pad surface and spill clean up is needed within secondary containment. Refer to Photos 13 and 18.

Corrective Action: The prior Corrective Action remains in effect and remains 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: \_\_\_\_\_

**Spill/Remediation:**

Comment: Operator has complied with the previous corrective action to submit a Form 27 for the pit.

Corrective Action:

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

Emission Control Burner (ECB): \_\_\_\_\_

Comment:

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**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 prior Corrective Action remains in effect; reference Field Inspection Report doc. #697504498, dated 02/10/2023.](#)

Corrective Action **Comply with Rule 1002.c.**  
**The corrective action date is the date the location was observed out of compliance.**

Date **02/10/2023**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment [Operator has initiated repairs along the access road, which appear to have widened the access road in portions, violating the intent to minimize surface disturbance and confirming the complaint. Refer to Photos 1-2.](#)  
  
[At the time of this inspection, Operator believed no further work was required to remove rock outside of the access road that was pushed onto pasture land during snow removal operations. COGCC staff communicated to the Operator that more work was still required and stopped along one section to illustrate the point. Refer to Photos 1-2.](#)  
  
[COGCC staff witnessed more vehicle traffic off the access road than the previous inspection and confirming the complaint. Refer to Photos 4-5.](#)

Corrective Action **The prior Corrective Action remains in effect and remains out of compliance.**

Date **02/10/2023**

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: 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

**Storm Water:**

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

Comment: [Geary Creek- Operator has imported additional road base to stabilize the road but the remainder of the other work to install additional BMPs is planned. Refer to Photo 15-16.](#)

[Operator has cleaned out the cattle guard. Refer to Photo 6.](#)

[Note- COGCC staff issued a Corrective Action to CCRP to collaborate with Upland on the Geary Creek required work since this is a shared access road and the erosion issues into Geary Creek would be a shared effort.](#)

Corrective Action: [The prior Corrective Action remains in effect and remains out of compliance.](#)

Date: 02/10/2023

**Pits:**  NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
697504596	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6081291">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6081291</a>