

**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:

04/07/2023

Submitted Date:

04/13/2023

Document Number:

697504595

FIELD INSPECTION FORMLoc ID 456651 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10701

Name of Operator: UPLAND EXPLORATION LLC

Address: 424 S MAIN ST

City: BOERNE State: TX Zip: 78006

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****Contact Information:**

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

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			
Lease Road:			
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:	<p>Comply with Rule 427.b</p> <p>The prior Corrective Action remains in effect and remains out of compliance.</p>		Date: 02/28/2023
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: <input style="width: 100%;" type="text"/>
Good Housekeeping:			
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:	<p>Comply with Rule 606.c.</p> <p>The prior Corrective Action remains in effect and remains out of compliance.</p>		Date: 02/10/2023
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:	<p>Comply with Rule 606.</p> <p>The corrective action date is the date the location was observed out of compliance.</p>		Date: 04/07/2023
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:	<p>Comply with Rule 606.d.</p> <p>The prior Corrective Action remains in effect and remains out of compliance.</p>		Date: 02/10/2023
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment: <input style="width: 100%;" type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?			
Equipment:			
Type:	#		corrective date

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.](#)Date **02/10/2023**[The corrective action date is the date the location was observed out of compliance.](#)

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 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 _____

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
<p>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.</p> <p>Operator has cleaned out the cattle guard. Refer to Photo 6.</p> <p>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.</p>						
<p>Corrective Action: The prior Corrective Action remains in effect and remains out of compliance.</p>						Date: 02/10/2023
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

Attached Documents

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

Document Num	Description	URL
403373439	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6081293
697504596	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6081291