

**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:

02/16/2023

Document Number:

697504499

FIELD INSPECTION FORMLoc ID 462919 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:

12 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
		larry@uplandexploration.com	
Arthur, Denise		denise.arthur@state.co.us	
		david@uplandexploration.com	
Wold, Reed		reed.wold@state.co.us	
Trujillo, Aaron		aaron.trujillo@state.co.us	
,		dnr_cogccenforcement@state.co.us	COGCC Enforcement

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
462918	WELL	PR	06/15/2020	OW	123-49880	Little Lady 22-2CH	RI
462920	WELL	PR	06/20/2020	OW	123-49881	Little Lady 22-1NH	RI
480997	TANK BATTERY	AC	10/28/2021		-	21-11N-64W SESE 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/South 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
- 7) 1002.f. Stormwater Management
- 8) 902 Pollution
- 9) 906 Management of Non-E&P Waste

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

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused risers and electrical power sources were observed along the western location. Unused equipment was observed near the wellhead and unused supplies were observed along the eastern BMP area. Operator has failed to remove unused equipment and supplies. Refer to Photos 8-9, 17-19.		
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 was observed south and off the location. A potential tarp/cover that was not secured was observed along the western location. 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 6-7.		
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 within the production equipment along the northeastern location, along the eastern well pad and within the eastern BMP area. Operator has failed to control and manage weeds to prevent weed waste and prevent seeds from spreading onto adjacent lands. Refer to Photos 11,16-17.		
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			

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		
Comment:	Wildlife protection devices (netting) are insufficient for secondary containment BMPs. Remove and properly dispose fluids from within the secondary containment. Refer to Photo 15.		
Corrective Action:	Comply with Rule 902.b to install or repair wildlife protection equipment, and properly dispose fluids from within the secondary containment.		Date: 02/10/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	<u>462918</u>	Type:	<u>WELL</u>	API Number:	<u>123-49880</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>462920</u>	Type:	<u>WELL</u>	API Number:	<u>123-49881</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>480997</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 northeastern location was observed, mainly around the compressors. Operator has failed to properly remove and/or remediate stained soil. Refer to Photo 13.

Corrective Action:

Control and contain spills/releases and clean up per Rule 912.a.

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:

There appears to be a spill of non-E&P exempt waste from a Mobil Pegasus SAE 40 container along the northeastern location. Refer to Photo 12. This will need to be reported to CDPHE and this appears to be a violation of Rule 906. COGCC has contacted CDPHE about this issue. Please call 1-877-518-5608.

Corrective Action:

Comply with Rule 906.

Date: 02/10/2023

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 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 10.

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 2020; therefore, interim reclamation should have been completed by November 2020. This location is over two years 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 ☐**Storm Water:**

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

Comment: Operator has poor housekeeping and it appears diesel fuel has spilled onto the ground during fueling operations for a flameless heater. Operator will be required to have secondary containment for this piece of equipment.

Operator has failed to implement material handling and spill prevention. Refer to Photo 14.

Corrective Action: Comply with Rules 1002.f.(2)B

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

Date: 02/10/2023

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
<p>COGCC Summary:</p> <p>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.</p>	binschusc	02/16/2023

Attached Documents

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

Document Num	Description	URL
697504502	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6024649