

**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:

06/15/2023

Submitted Date:

06/21/2023

Document Number:

697504722

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:

9 Number of Comments

7 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
		dustin@uplandexploration.com	

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 6/15/2023, Reclamation Specialist Chris Binschus performed a follow up inspection.

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

Refer to the Lease Road, Good Housekeeping, Location Construction/Stormwater, Reclamation, Stormwater and COGCC Comments sections of this inspection report for additional details.

Location

Lease Road:			
Type	Main		
comment:	It does not appear the Operator has not made any improvements to the access road since the previous inspection. Portions of the access road are not stabilized during wet conditions and dusty during dry conditions. COGCC has documentation during the week of June 12th documenting fugitive dust from the Operator. Operator has failed to minimize fugitive dust and remains out of compliance.		
Corrective Action:	Comply with Rule 427.b.	Date:	02/28/2023

Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Operator has removed Russian thistle weed debris by raking the approximate 1.5 mile section of the 5.5 mile access road as well as the location. After raking was complete, Operator has claimed to have sprayed the weeds. However, this 1.5 mile section of road as well as other portions of the 5.5 mile access road and the location all have Russian thistle weed establishment. The current weed management plan is not sufficient and remains out of compliance.		
Corrective Action:	Comply with Rule 606.c.	Date:	02/10/2023
Type	TRASH		
Comment:	Trash was observed along the access road and location.		
Corrective Action:	Comply with Rule 606.d.	Date:	02/10/2023

Overall Good: ☐

Spills:			
Type	Area	Volume	

In Containment: No

Comment:

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 456651 CDP: _____

Comment: _____

Corrective Action: _____

Date: _____

Form 2A COAs:**Comment:** _____

Corrective Action: _____

Date: _____

Wildlife BMPs:**Comment:** _____

Corrective Action: _____

Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
_____	_____	_____	_____

Comments: Erosion BMPs: There are a number of deficiencies with stormwater BMPs, lack of BMPs, and sediment discharge into a High Priority Habitat (Aquatic Native Species Conservation Waters). Upland has disturbed much of the access road due to improper road maintenance. Refer to the COGCC Comments section for more detail.

Other BMPs: _____

Corrective Action: Operator shall submit an engineered stamped Permanent Stormwater Management Plan. The Plan shall address the access road and location.

Date: 07/05/202
3

Comment: _____**Corrective Action:** _____**Date:** 07/05/2023**On Site Inspection (305):**Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

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

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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

Operator claimed that the topsoil stockpile has been seeded; however, there is no evidence of desirable germination, only weedy annual growth. COGCC staff has discussed a number of times with the Operator the need to stabilize seeded soil. COGCC does not believe the Operator ever stabilized the topsoil stockpile.

COGCC staff does not believe the Operator has attempted to reseed the windrowed topsoil along an approximate 1.5 mile section of the access road. This 1.5 mile section predominately remains established with Russian thistle.

Corrective Action

Comply with Rule 1002.c.

Date 02/10/2023

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment

Operator has not conducted reclamation on areas disturbed due to access road expansion, and other adjacent areas disturbed due to improper road maintenance and vehicle traffic off the original access road boundary. Weeds are starting to establish and the Operator is failing to perform sufficient weed management.

Surface disturbance minimization remains out of compliance.

Corrective Action

Comply with Rule 1002.e

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

Comment: During the 5/11/2023 field inspection (FIR Doc.# 697504665), new stormwater issues were observed along the western fill slope. COGCC Staff back-dated the corrective action to 2/10/2023; the corrective action date should have been 5/11/2023. Due to on-going stormwater issues observed during this inspection, the corrective action date of 5/11/2023 remains out of compliance.

Refer to the COGCC Comments section for additional Stormwater Management comments.

Corrective Action: **Comply with Rule 1002.f.**

Date: 05/11/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	484276	403352150	
	484276	403352150	

COGCC Comments

Comment	User	Date
<p>Stormwater Management comments:</p> <p>1) Upland Exploration disturbed a cut slope just east of Geary Creek in relation to improper road maintenance. Operator has failed to stabilize the cut slope, which is now eroding into Geary Creek. Refer to Photos 3-4.</p> <p>2) Upland has imported a significant amount of road base material in the Geary Creek area which has created more runoff potential than previously observed. Sediment discharge into the eastern channel of Geary Creek was observed and there were no stormwater BMPs. Refer to Photos 5-6.</p> <p>3) Upland has constructed a number of check dams which have not been installed per good engineering practices and have not installed check dams at the appropriate spacing intervals. Refer to Photos 8-9.</p> <p>4) Upland has constructed a berm BMP along the toe of the western fill slope which has not been installed per good engineering practices. Refer to Photos 12-13.</p> <p>5) Gully erosion was evident along the southern perimeter of location and in need of repair. Refer to Photos 14-15.</p>	binschusc	06/21/2023

Attached Documents

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

Document Num	Description	URL
697504723	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6155796