

**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 FORM**Loc 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		
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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:

\_\_\_\_\_



**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 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: 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

**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
403441251	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6155797">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6155797</a>
697504723	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6155796">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6155796</a>