

**BP America Production Company**  
**San Juan North**  
**Post-Construction Stormwater Management Plan**  
**Exempt Location**  
**Hester GU #1**

In accordance with Colorado Oil and Gas Conservation Commission (COGCC) Rule 1002 f., upon the termination of a construction stormwater permit issued by the Colorado Department of Public Health and Environment for an oil and gas location, such oil and gas location is subject to the Post-Construction Stormwater Program requirements of Rule 1002.f.(3), except that such requirements are *not* applicable to Tier 1 Oil and Gas Locations.

COGCC 100 Series Definition: *Tier 1 Oil and Gas Location* shall mean an oil and gas location where the slope is less than five percent (5%), the soil has low erosion potential, vegetative cover or permanent erosion resistance cover is greater than seventy-five percent (75%), the distance from a perennial stream or Classified Water Supply Segment is greater than five hundred (500) feet, and the oil and gas location size is less than one (1) acre, measured by the amount of surface disturbance at the time of the termination of a construction stormwater permit issued by the Colorado Department of Public Health and Environment.

**Hester GU #1 Tier I criteria assessment:** Except for the shallow fill slope on the east side of the well site which is well vegetated and varies from being nearly flat at the north end and at maximum 2:1 at the location entry with a less than a 3 foot drop , the location is nearly flat and thus is believed to meet the less than 5% slope criteria. Vegetated cover in the interim reclaim area is excellent at 100% or nearly so. The nearest perennial or classified stream is approximately 1 mile away. The non-vegetated portion of the pad encompasses 0.61 acres.

A low gravel berm was installed along the east edge of the boundary between the interim reclaim and the active well pad at the request of the adjacent landowner to the east. This berm is undesirable as it impedes sheet flow and thus concentrates flow with the discharge being directed to the steepest part of the pad in the southeast corner. A rock rundown is being installed to address some minor erosion on the short section of steep slope at this point. Multiple sets of straw wattles have been installed along the stormwater flow paths with activated charcoal on the upstream side of the wattles to capture any herbicide residual that may potentially be carried off the pad by stormwater flows. These measures were implemented to appease the concerns of the adjacent landowner.

Based on this assessment, the Hester GU #1 is believed to qualify as a Tier 1 Oil and Gas Location as do most of BP's single well pads in San Juan North.

  
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