

# Captiva Energy Partners Response to COGCC Questions on Stillroven Farm Pad Form-2A

August 23, 2017

1. The Cultural Distance section indicates the nearest Building & Building Unit is 672 feet from a production facility. However, the Cultural Items Map indicates the edge of the nearest production facility is 682 feet from a Building & Building Unit. Exactly what piece of production facility equipment is the nearest to a Building & Building Unit and what is that distance?

The edge of the nearest production facility is 682 ft from the tank battery to the Building & Building Unit located to the NW of the pad on the north side of the WCR 38, and as also now indicated on the revised Cultural Items Map. The cultural distance section of the Form-2A will be updated to accurately reflect the nearest Building & Building Unit distance to the production facility of 682 ft as well.

2. For the siting rationale, will you provide some additional discussion of how the placement of production facilities on the pad was determined. The current siting rationale primarily speaks to the siting of the location as a whole on the Surface Owner's property, but we need to have some discussion of why the production facilities themselves are being placed where they are shown. Please also include how the placement of the production facilities accounts for maximizing the distance to the nearby Building Units. This is the primary requirement of the siting rationale as required by Rule 604.c.(2)E.i.

There are five Building Units located within 1,000 ft of the proposed facility, three on the east side and two on the west. The primary rationale for siting the facility as proposed on the Facility Diagram and Cultural Items Map within the boundaries of the existing Surface Use Agreement (SUA) area was to place the facility, 1) as far off County Road 5 as possible to minimize the visual impact from the road, and 2) to site it as far away as possible from the three Building Units on the east side of the pad that would have a direct view of the facility. In doing so, the Building Unit to the NW will be the closest to the facility with the tank battery being located 682 ft away. The rationale for siting the proposed facility closer to the Building Units on the west side than the east side, is that the Building Units on the west side of the pad are currently shielded from a direct view of the proposed facility by existing, dense, mature trees. Per the SUA, the Operator plans to construct an earthen berm around the tank battery and plant trees on it to minimize the visual impact of the tanks with respect to the Building Units on the east side of the pad. In 2011, the Surface Owners agreed to this pad location in the SUA because they did not want the tank battery located immediately adjacent to the county road.

3. The noise mitigation BMP needs some additional detail in regards to the following statement: "Sound walls, sound barriers, and/or hay bales will be used as necessary..." While we like the use of sound walls, sound barriers, and/or hay bales, the phrase "as necessary" is too

ambiguous. What exactly does Captive Energy mean by that? What will determine when the use of sound walls, barriers, and/or hay bales are necessary and where they will be placed? Will the sound mitigation program determine that or will Captiva Energy wait until noise complaints are made to do this? Please revise the noise mitigation BMP to further clarify when and where sound walls, barriers, and/or hay bales will be used on the location.

The Operator plans to engage a qualified sound mitigation contractor to construct a sound model using existing sound survey data that has been established on many drilling rigs prior to commencing drilling operations to make recommendations for a sound mitigation program using sound walls, sound barriers, and/or hay bales as needed to achieve compliance with Rule 802. The exact location and type of sound mitigation will be determined by the recommendations of the sound model and sound mitigation contractor with objective of achieving compliance. The Operator currently anticipates using sound mitigation measures, at a minimum, on the east side of the location to mitigate the Building Unit directly to the east (~616 ft away from the wells). Examples of anticipated sound mitigation measures include sound walls, sound barriers, and/or hay bales.

Following is a rewrite of the Noise Mitigation BMP:

Noise Mitigation - 604.c.(2)A. The Operator will work with a qualified sound mitigation contractor to develop a sound mitigation program to meet COGCC requirements during drilling and completion operations. The location and type of sound mitigation measures will be determined by the Operator from the recommendations of a sound model using existing sound survey data from drilling rigs prior to commencing drilling operations, as well as recommendations from a sound mitigation contractor. During drilling and completion operations, the Operator anticipates that, at a minimum, there will be sound mitigation measures placed along the east side of the location to mitigate the Building Unit directly to the east (~616 ft away from the wells). Examples of anticipated sound mitigation measures include sound walls, sound barriers, and/or hay bales. If the sound mitigation program requires additional mitigation measures to achieve compliance levels, they will be implemented. Please note, the entrance to the pad is on the east side of the location, so there will be a break in the sound barrier to accommodate the access road.