

FORM
2A

Rev
06/19

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402011503

(SUBMITTED)

Date Received:

Oil and Gas Location Assessment

☐ New Location ☐ Refile ☒ Amend Existing Location Location#: 437439

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

437439

Expiration Date:

☒ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # _____
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 47120
Name: KERR MCGEE OIL & GAS ONSHORE LP
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779

Contact Information

Name: ERIN HAMPE
Phone: (720) 929-3242
Fax: ()
email: ERIN.HAMPE@ANADARKO.CO
M

FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20010124 ☐ Gas Facility Surety ID (Rule 711): _____
- ☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: WINDSOCK Number: 15-21HZ PAD
County: WELD
Quarter: SWSE Section: 21 Township: 1N Range: 68W Meridian: 6 Ground Elevation: 5222

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 370 feet FSL from North or South section line
2374 feet FEL from East or West section line

Latitude: 40.030382 Longitude: -105.007610

PDOP Reading: 1.4 Date of Measurement: 11/18/2018

Instrument Operator's Name: JEREMY GROVES

LOCAL GOVERNMENT INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this COGCC application? If the local government has waived its right to precede the COGCC in siting determination, indicate by selecting "NO" here and selecting "Waived" below.

☒ Yes ☐ No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location. ☒

The local government siting permit type is: WOGLA

The local government siting permit was filed on: 05/12/2019

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

WOGLA application was approved on June 24, 2019 (see attachment). WOGLA application was submitted on May 13, 2019. Location is within 1500' of the town of Erie. Kerr-McGee met with the Town of Erie staff to discuss the location, haul routes and access road prior to sending out the WOGLA notices. The LGD from the Town of Erie was included in the WOGLA notice, which was sent on April 11, 2019. The proposed haul routes and access permits have been reviewed by the Town of Erie and were approved on June 5, 2019. The Emergency Action Plan has been reviewed by the Mountain View Fire Protection District and was approved on June 7, 2019.

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is: LOCATION ID # FORM 2A DOC #



FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	11	Oil Tanks*		Condensate Tanks*	1	Water Tanks*	3	Buried Produced Water Vaults*	
Drilling Pits		Production Pits*		Special Purpose Pits		Multi-Well Pits*		Modular Large Volume Tanks	
Pump Jacks	11	Separators*	13	Injection Pumps*		Cavity Pumps*		Gas Compressors*	
Gas or Diesel Motors*		Electric Motors		Electric Generators*		Fuel Tanks*		LACT Unit*	2
Dehydrator Units*		Vapor Recovery Unit*		VOC Combustor*	1	Flare*		Pigging Station*	

OTHER FACILITIES*

Other Facility Type	Number
COMPRESSED AIR SUPPLY LINES	11
FLOW LINES	11
GAS LIFT LINES	11
GAS PIPELINES	3
OIL PIPELINE	1
TEMPORARY 500 BBL TANKS	17
TEMPORARY ECDs	3
TEMPORARY GENERATOR	1
TEMPORARY PURGE FLARE	1

Those facilities indicated by an asterisk () shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

Two 500 barrel skid-mounted frac tanks will be temporarily placed onsite for use of the pre-spud rig only. One tank will store water and the other will store water-based mud. A temporary ECD may be utilized during drilling.

15 temporary 500 barrel tanks and 2 temporary ECDs will be utilized during flowback and initially for produced water. It is estimated the temporary tanks will be on location for 9 - 12 months, and will be removed incrementally as water production declines. The ECDs will be on location for the duration the temporary tanks are utilized. A temporary generator may be placed on location if needed, and would be in place for <6 months until electric power is available.

Please see Comments section for flow line and pipeline description.

CONSTRUCTION

Date planned to commence construction: 07/24/2019 Size of disturbed area during construction in acres: 10.83
Estimated date that interim reclamation will begin: 01/24/2020 Size of location after interim reclamation in acres: 3.16
Estimated post-construction ground elevation: 5222

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H₂S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE

Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Please see Comments section. Disposal description will not fit in space provided.

Beneficial reuse or land application plan submitted? Yes

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: 149021

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: BOB BRESNAHAN

Phone: _____

Address: CRESTONE PEAK RESOURCES
HOLDINGS LLC

Fax: _____

Address: 1801 CALIFORNIA STREET,
SUITE 2500

Email: BOB.BRESNAHAN@CRESTONEPR.COM

City: DENVER State: CO Zip: 80202

Surface Owner: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check all that apply. The Surface Owner: ☐ is the mineral owner

☐ is committed to an oil and Gas Lease

☐ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: _____ Surface Surety ID: _____

Date of Rule 306 surface owner consultation 04/12/2019

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☒ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): _____

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Future Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☒ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): _____

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	759 Feet	378 Feet
Building Unit:	2640 Feet	2191 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	246 Feet	170 Feet
Above Ground Utility:	304 Feet	227 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	263 Feet	186 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)? ☐ Yes ☒ No

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- ☐ Buffer Zone
- ☐ Exception Zone
- ☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.
- Large UMA Facility – as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: _____

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- ☐ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- ☐ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 40—Nunn loam, 1 to 3 percent slopes

NRCS Map Unit Name: 83—Wiley-Colby complex, 3 to 5 percent slopes

NRCS Map Unit Name: _____

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☐

Plant species from: ☐ NRCS or, ☐ field observation Date of observation: _____

List individual species:

Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- ☐ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- ☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- ☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- ☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- ☐ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- ☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- ☐ Alpine (above timberline)
- ☐ Other (describe): _____

WATER RESOURCES

Is this a sensitive area: ☐ No ☒ Yes

Distance to nearest

downgradient surface water feature: 7 Feet

water well: 0 Feet

Estimated depth to ground water at Oil and Gas Location 18 Feet

Basis for depth to groundwater and sensitive area determination:

Nearest surface water features:

Wetland: 7' N Elev: 5215'

Wetland: 149' N Elev: 5218'

Wetland: 152' NW Elev: 5219'

Community Ditch: 553' WSW Elev: 5246'

Loc Elev: 5222'

Note: Drainage depicted on topo (through proposed location) no longer exists.

Nearest water wells:

0' E, Permit 228863-, depth unknown, Static Water Level unknown, Elev 5219'

1315' SSW, Permit 194139-, depth 15', Static Water Level 11', Elev 5251'

Sensitive Area Determination: SENSITIVE AREA, depth to groundwater less than 20'

Location is NOT in floodplain according to Weld County and FEMA

(SWL calc: $(5222 - 5251) + 11 = 18$)

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

Is the Location within a Floodplain? ☒ No ☐ Yes Floodplain Data Sources Reviewed (check all that apply)

☒ Federal (FEMA)

☐ State

☒ County

☐ Local

☐ Other

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

WILDLIFE

☐ This location is included in a Wildlife Mitigation Plan

☐ This location was subject to a pre-consultation meeting with CPW held on _____

Operator Proposed Wildlife BMPs

No BMP

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

- ☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments

PLEASE ENSURE ALL CORRESPONDENCE ASSOCIATED WITH THIS PERMIT GOES TO ANALYST AND DJREGULATORY EMAIL ADDRESSES, AS LISTED ON THIS PERMIT.

The Windsock 15-21HZ pad is located on a surface owned by Crestone Peak Resources and will be developed from an existing CPR temporary pipe yard location (Loc ID: 437439). KMG has recently submitted a Weld County Recorded Exemption application and plans to work with the landowner on purchasing ~14.9 acres where the Windsock pad is located.

Drilling fluids disposal: KMG will reuse water-based drilling fluids to the maximum extent possible, at which point they will either be land applied offsite or taken to a licensed, commercial disposal site; the decision will be based upon laboratory analysis of fluids. KMG will reuse oil-based drilling fluids to the maximum extent possible, at which point they will be returned to the fluids manufacturer for reconditioning or offsite disposal at a licensed, commercial disposal site.

Cuttings disposal: Water-based cuttings will be disposed of offsite, using a Centralized E&P Waste Management facility or a private spread field (also offsite), depending on what is feasible at the time of drilling. Oil-based cuttings will be disposed of offsite and at a licensed, commercial disposal site.

Pipelines: Buried pipelines will be utilized to gather the gas and oil product from the location (3 gas pipelines, 1 oil pipeline). Both gas and oil pipelines will be constructed from steel of suitable wall thickness and material grade to meet the respective gathering systems design pressure. Gas pipelines will range in diameter from 4" to 20"; oil pipelines from 4" to 12". Capacity of pipelines will vary based on diameter. Pipelines will begin at the location and terminate at larger trunk lines in the area.

Temporary above ground polyethylene water pipelines (diameter 10" – 12" with a 60 BPM capacity) will deliver water to location operations from larger trunk lines.

Flow Lines: 11 new flow lines will flow to the production facility location. During production, flow direction in the flow lines is from the well head to the production facility. The size of flow lines is typically 2". Flow lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility, approximately 255' to 362'.

11 compressed air supply lines will also be installed from the well head to the production facility. During operation flow direction in the supply lines will be from the production facility to the well head. The size of the supply lines is typically 1". Supply lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility, approximately 255' to 362'.

Gas lift lines are also occasionally installed (one per well) from the well head to the production facility. During operation flow direction in the gas lift lines will be from the production facility to the well head. The size of the gas lift lines is typically 2". Gas lift lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the tank battery, approximately 255' to 362'.

CUSTODY TRANSFER: Gas custody transfer occurs at the custody transfer meter located on the proposed production facility location. Oil custody transfer occurs at the LACT Unit located on the proposed production facility location. Oil is transferred from the LACT Unit into a pipeline owned by Anadarko Wattenberg Oil Complex LLC.

Two temp tanks with optional ECD will be used for drilling mud and fresh water for use by surface rig, and will be on location while drilling.

Distances from temporary, 500bbl produced water tanks:

BUILDING: 459'

BUILDING UNIT: 2095'

HIGH OCCUPANCY BUILDING UNIT: 5280'

DESIGNATED OUTSIDE ACTIVITY AREA: 5280'

PUBLIC ROAD: 526'

ABOVE GROUND UTILITY: 583'

RAILROAD: 5280'

PROPERTY LINE: 542'

SCHOOL FACILITY: 5280'

SCHOOL PROPERTY LINE: 5280'

CHILD CARE CENTER: 5280'

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: _____ Email: DJREGULATORY@ANADARKO.COM

Print Name: ERIN HAMPE Title: REGULATORY ANALYST

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ Director of COGCC Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type

Description

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Best Management Practices

No BMP/COA Type

Description

1	Planning	604c.(2).V Development from Existing Well Pad: The Windsock 15-21HZ pad is located on a surface owned by Crestone Peak Resources and will be developed from an existing CPR temporary pipe yard location (Loc ID: 437439).
2	Planning	604c.(2).D Traffic Plan: KMG has obtained access and ROW permits per Weld County Code and will implement COAs and traffic control plans as required. The Right of Way application was approved by the Town of Erie on May 24, 2019.
3	Planning	The nearest building unit is located 2191' away from the permanent equipment on this proposed oil and gas location, 2095' away from the temporary tanks, and 2640' away from the nearest wellhead, therefore it is not within a Designated Setback Location and is exempt from 604.c.
4	Planning	604c.(2).S. Access Roads: KMG will utilize a lease access road from CR 6, which is maintained by the Town of Erie, for drilling, completions, and production operations, including maintenance equipment. The road will be properly constructed and maintained to accommodate for local emergency vehicle access. The access permit was approved on June 5, 2019.
5	Planning	604c.(2).E. Multi-Well Pads: To minimize impact and consolidate the overall oil and gas disturbance, this application is for an 11-well pad / oil and gas location, and is located adjacent to an existing oil and gas facility.
6	Traffic control	KMG currently plans to use the water-on-demand system on this location which is a network of over 140 miles of underground pipeline that stretches the length of the 20-mile by 30-mile field to source and transport water to completions crews. This system eliminates more than 2,000 truck trips per day, also reducing associated concerns of traffic, noise, emissions and dust.
7	General Housekeeping	803 Lighting: Site lighting shall be downcast, shielded and directed inward toward operations to minimize disturbance to existing structures and public roadways. The use of sound panels will provide additional light mitigation.
8	Storm Water/Erosion Control	604c.(2).W Site-Specific Measures: KMG maintains a Storm Water Management Plan that assesses erosion control for every KMG operated location. This location will be added to this plan once construction begins. This site will be inspected every fourteen (14) days during construction activities, every twenty-eight (28) days after construction is completed, and after any major weather event.
9	Storm Water/Erosion Control	604c.(2).G Berm Construction: Kerr-McGee will create tertiary containment by construction of a berm or diversion dike, site grading, or other comparable measures sufficient to further protect adjacent water features, including the wetlands located 7' north, 149' north, 152' northwest, and the community ditch located 553' of this proposed oil and gas location.

10	Material Handling and Spill Prevention	604c.(2).G. Berm Construction: The temporary produced water storage tanks will be staged on a geosynthetic liner and surrounded by an earthen berm. The berms shall enclose an area sufficient to provide secondary containment for 150% of the volume of the largest single tank, and shall be sufficiently impervious to contain spilled or released material. Berms and the liner shall be inspected at regular intervals and maintained in good condition.
11	Material Handling and Spill Prevention	604c.(2).R. Tank Specifications: A geosynthetic liner will be laid under the tanks on this location and a steel containment will be constructed. Crude oil and condensate storage tanks shall be designed, constructed and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). KMG will maintain written records to verify proper design, construction and maintenance. All records will be available to the COGCC upon request.
12	Material Handling and Spill Prevention	604c.(2).F. Leak Detection Plan: Automation technology will be utilized at this facility. This technology includes the use of fluid level monitoring for the tanks and produced water sumps, high-level shut offs, and electronic sensors to monitor the interstitial space of double-walled produced water sumps. All automation is monitored by Kerr-McGee's Integrated Operations Center (IOC), which is manned 24 hours per day, 7 days per week.
13	Dust control	805.c Dust: Water will be placed on dirt access roads to mitigate dust as needed. Magnesium chloride will also be used as needed on access roads to further abate dust. Traffic control and speed restrictions will also be employed.
14	Noise mitigation	604c.(2).A. Noise: Sound surveys have been conducted on each rig type and are utilized to anticipate any additional effective noise mitigation once a drilling rig is determined. At a minimum, and pending a safety review after construction of the location, a 16' sound mitigation wall will be installed along the South side of the pad to dampen noise and minimize impact to Weld County Road 6 during drilling and completions. Should technological advancements allow for better noise mitigation at the time of drilling and completion operations on this location, Kerr-McGee will re-evaluate the most effective method at that time.
15	Emissions mitigation	ECD(s) will be utilized to mitigate releases of emissions from temporary produced water storage tanks for the duration which the tanks are on location and being used.
16	Emissions mitigation	604c.(2).C Green Completions: Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, the operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.
17	Odor mitigation	805.b Odors: KMG will comply with the provisions of 805.b as deemed applicable. Additional BMPs for the WINDSOCK 15-21HZ location are: 1) the storage of excess drilling fluid (e.g., fluid not being used in the active mud system) in closed, upright tanks; and 2) odor neutralizer will be stored on location to use in the active mud system if deemed necessary.
18	Drilling/Completion Operations	604c.(2).B. Closed Loop Drilling System: KMG will use a closed loop or "pitless" system for drilling and fluid management and will not construct a reserve pit.
19	Material Handling and Spill Prevention	604.c.(2)R: Temporary water tanks shall be designed, constructed, and maintained in accordance with the following portions of the National Fire Protection Association (NFPA) Code 30 (2008 version): 1) Tanks are built to engineering standards using noncombustible materials, with relief device sizing based on API 2000 standards. 2) Tanks are inspected and maintained while in use. 3) The only pipes within the containment are related to the temporary tanks (i.e. no external piping is co-located within the containment), and firefighting equipment is likewise not stored within the containment area.

Total: 19 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402018667	WASTE MANAGEMENT PLAN
402038411	ACCESS ROAD MAP
402038412	LOCATION DRAWING
402062261	HYDROLOGY MAP
402062262	MULTI-WELL PLAN
402062263	WELL LOCATION PLAT
402062278	NRCS MAP UNIT DESC
402062284	LOCATION PICTURES
402085614	SURFACE AGRMT/SURETY
402086616	OTHER

Total Attach: 10 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

Public Comments

No public comments were received on this application during the comment period.

