

FORM  
2A

Rev  
02/20

State of Colorado  
Oil and Gas Conservation Commission

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



Document Number:

402200988

Date Received:

12/19/2019

Oil and Gas Location Assessment

☒ New Location ☐ Refile ☐ Amend Existing Location Location#: \_\_\_\_\_

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 <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**474453**

Expiration Date:

**03/29/2023**

☒ 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: 10690  
Name: IMPETRO RESOURCES LLC  
Address: 2820 LOGAN DRIVE  
City: LOVELAND State: CO Zip: 80538

Contact Information

Name: SAM BRADLEY  
Phone: (970) 593-8626  
Fax: ( )  
email: sbradley.impetro@gmail.com

FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20180029 ☐ Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- ☐ Waste Management Surety ID (Rule 704): \_\_\_\_\_

LOCATION IDENTIFICATION

Name: ALICE SEEDORF Number: 1  
County: WASHINGTON  
QuarterQuarter: NESW Section: 22 Township: 2N Range: 49W Meridian: 6 Ground Elevation: 4234  
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: 1650 feet FSL from North or South section line  
2040 feet FWL from East or West section line  
Latitude: 40.123560 Longitude: -102.843830  
GPS Quality Value: 2.3 Type of GPS Quality Value: PDOP Date of Measurement: 07/23/2019  
Instrument Operator's Name: ELIJAH FRANE

LOCAL GOVERNMENT INFORMATION

County: WASHINGTON 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 location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition 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: \_\_\_\_\_

The local government siting permit was filed on: \_\_\_\_\_

The disposition of the application filed with the local government is: \_\_\_\_\_

Additional explanation of local process:

Washington County does not have siting regulations.

## 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 #**

Well Site is served by Production Facilities \_\_\_\_\_ 402201254

## FACILITIES

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

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

## OTHER FACILITIES\*

<u>Other Facility Type</u>	<u>Number</u>
----------------------------	---------------

--	--

\*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:

Well head to production facility tanks will have a 3 inch buried SDR-11 HDPE pipe.

## CONSTRUCTION

Date planned to commence construction: 04/06/2020 Size of disturbed area during construction in acres: 5.70

Estimated date that interim reclamation will begin: 08/11/2020 Size of location after interim reclamation in acres: 1.03

Estimated post-construction ground elevation: 4234

## DRILLING PROGRAM

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

Is H<sub>2</sub>S 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? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Land application  
Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal  
Other Disposal Description:

A Water Based Bentonitic Drilling Fluids agreement is included within the attached SUA.

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

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

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Seeds Ranch Inc.

Phone: \_\_\_\_\_

Address: 2505 C.R. 38

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

City: Yuma State: CO Zip: 80759

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: oil and gas lease

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

Date of Rule 306 surface owner consultation 10/21/2019

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s): \_\_\_\_\_

## 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:	3648 Feet	3648 Feet
Building Unit:	3648 Feet	3648 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	1620 Feet	1620 Feet
Above Ground Utility:	1998 Feet	1998 Feet
Railroad:	4870 Feet	4870 Feet
Property Line:	616 Feet	616 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: #58 Rago silt loam, 0 to 2% slopes.

NRCS Map Unit Name: #78 Weld silt loam, 0 to 3% 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: 5280 Feet

water well: 3440 Feet

Estimated depth to ground water at Oil and Gas Location 216 Feet

Basis for depth to groundwater and sensitive area determination:

The Location is in a sensitive area due to its presence in the W-Y Basin and the Northern High Plain Aquifer Recharge Zone.  
Distance to nearest:

1. Downgradient surface water feature: 5280'.
2. Water well: 3440' to Permit 6478-FP, irrigation well. No depth noted on permit.
3. Estimated depth to ground water at O&G location: 216' based upon nearby water wells.

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 zone: No

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 COGCC technical review evaluated soil type, topography, and geomorphology and determined that this location is not in a floodplain.

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 609

## WILDLIFE

☐ This location is included in a Wildlife Mitigation Plan

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

## 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

A Water Based Bentonitic Drilling Fluids agreement is included within the attached SUA on page 2, B.2.  
The attached SUA includes an assignment to Impetro on page 5.

The Cultural Distances are the same from the Well and Production equipment as the only equipment will be at the wellhead.

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

Signed: \_\_\_\_\_ Date: 12/19/2019 Email: paul.gottlob@iptenergyservices.com

Print Name: PAUL GOTTLOB Title: Regulatory & Engin. Tech.

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: 3/30/2020

## 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**

--	--

## **Best Management Practices**

<b>No</b>	<b>BMP/COA Type</b>	<b>Description</b>
1	Traffic control	Access Roads: The access road will be constructed to accommodate local emergency vehicles. This road will be maintained for access at all times. Traffic will be routed to minimize local interruption. Dust control measures will also be utilized if needed.
2	Traffic control	A Rig Move permit will be secured with Washington County prior to rig move.
3	General Housekeeping	Trash Removal: All trash, debris and material shall be removed and legally disposed of as applicable.
4	Storm Water/Erosion Control	Operator will implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Impetro utilizes a ditch and berm or silt fence around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur and any evidence of stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate.
5	Material Handling and Spill Prevention	Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.
6	Dust control	Dust: 805.c: Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance including watering or mag chloride as needed, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers may be used.
7	Construction	Rule 803 Light sources during all phases of operations will be directed downwards and away from occupied structures where possible. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.
8	Drilling/Completion Operations	Guy Line Anchors: All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.

Total: 8 comment(s)

## **Attachment Check List**

<b>Att Doc Num</b>	<b>Name</b>
2479238	LOCATION DRAWING
2479239	HYDROLOGY MAP
2479249	OBJECTIVE CRITERIA REVIEW MEMO
2479250	CORRESPONDENCE
2479256	WASTE MANAGEMENT PLAN
402200988	FORM 2A SUBMITTED
402201079	NRCS MAP UNIT DESC
402235579	SURFACE AGRMT/SURETY
402265473	LOCATION PICTURES
402267065	ACCESS ROAD MAP

Total Attach: 10 Files



## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Final Review	Final Reivew complete; task passed.	03/27/2020
OGLA	Requested and received piping clarification, updated construction date, updated Waste Management Plan, floodplain determination language, and trash BMP clarification.	03/27/2020
Final Review	Final Review Pending - referred to OGLA staff for follow up.	03/26/2020
OGLA	The Objective Criteria Review Memo (Doc# 2479249) is attached to this Form 2A. Following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.	03/26/2020
OGLA	COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria # 5.c.	03/26/2020
OGLA	Received from operator: Location Drawing, Hydrology Map, and concurrence to change floodplain mapping selection. After discussion, received new Location Drawing and verbal concurrence to change location construction and location size after interim reclamation to reflect new drawing. Received verbal concurrence to update Sensitive Area for Water Resources comment.	03/11/2020
OGLA	Received cultural distance verification for building unit and stormwater BMP revision. Awaiting location size clarification, sensitive area for water resources comment. Added requests for scale bars on Location Drawing and Hydrology Map and information on floodplain determination.	03/09/2020
OGLA	Received from operator and updated form with: no need to remove facility setback distances, Cultural Distance updated for buildings and railroads, received concurrence to remove unneeded attachments, Sensitive Area changed, depth to groundwater changed, multiple BMP revisions changed, stormwater BMP received, chemical containment/storage BMP provided but not relevant. Still waiting on: location size clarification, updated construction and interim start dates, Cultural Distance verification for Building Unit, stormwater BMP revision.	03/02/2020
OGLA	Requested from operator: location size clarification, updated construction start and interim start dates, removal of facility setback distances, Cultural Distance verification for Buildings, Building Units, and Railroads, updated Location Drawing, concurrence to remove unneeded attachments, Sensitive Area for water resources to yes, depth to groundwater change, Sensitive Area for water resources comment, multiple BMP revisions, a stormwater BMP, and a chemical containment/storage BMP.	02/21/2020
OGLA	This Form has passed completeness.	12/23/2019

Total: 10 comment(s)