
DUST MITIGATION PLAN



Bigfoot 11

Sec. 11 T4N R63W (SWNW & NWSW)

Weld County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application
and consistent with the requirements of Rule 427.a.

Original Submittal: October 29, 2021

Resubmitted: December 10, 2021



Confluence DJ LLC Weld County, Colorado

Dust Mitigation Plan

Project Summary:

Confluence's proposed Bigfoot 11 location is located in Township 4 North, Range 63 West, Section 11 in Weld County, Colorado. The proposed location is fee surface with a total pad disturbance of 17.67 acres with a working pad surface area of 11.2 acres and a production pad area of 6.9 acres after interim reclamation. The graded site elevation is expected to be approximately 4617 feet. Construction is anticipated to begin no sooner than March 2022.

Project Overview:

Confluence's Dust Mitigation Plan is intended to facilitate compliance with the applicable regulations of the Colorado Oil and Gas Conservation Commission, the Colorado Department of Public Health and Environment and Weld County.

Confluence's development of the Bigfoot 11 location ("Location") requires earth disturbing activities and travel on unpaved roads which has the potential to produce fugitive dust emissions.

Dust associated with the Location activities and traffic on roads will be minimized throughout all phases such that there are minimal visible dust emissions from the Location or associated roads to the maximum extent practicable given wind and other weather conditions.

When handling sand used in hydraulic fracturing operations, Confluence's vendors will use an advanced Containerized Sand System for proppant delivery, storage on location, and delivery to the blender and frac fluid system. The containers use gravity (not pneumatics) to drop sand directly into the blender's sand hopper, basically eliminating dust generation. This system also removes people and equipment from the proppant handling operations during fracturing treatments, considerably reducing exposures and EHS risks to individuals from dust generated by older sand handling equipment (like conveyor belts). Remote controls are used to efficiently open and close sand gates on the bins to further reduce silica dust creation. Zero pounds of silica dust are anticipated to migrate off the Bigfoot 11 location during completions operations.

Any chemical application will have Safety Data Sheets on location.

Compliance with Rule 427.a.

1. Wellpad soil types:
 - 70 – Valent Sand, 3 to 9 percent slopes
- Access Road soil types:
 - 70 – Valent Sand, 3 to 9 percent slopes

2. Proposed vehicle speed limit: 20 MPH or less on roads; 5 MPH or less on the Location.
3. Total disturbed area: 17.67 acres for the wellpad, and production facilities. The wellpad is 17.67 acres including the production facility, the access road disturbance is 0.46 acres.
4. The primary route to and from this location is via Weld County Road 69 and State Highway 34, both of which are paved, which will inherently minimize dust. New access road construction off WCR 69 to the Bigfoot 11 location will be $\pm 440'$ long. Confluence will employ onsite dust mitigation measures which will include building the access road and Bigfoot 11 location using a layer of road base aggregate material, observing speed restrictions, and using silica dust controls when handling sand used in hydraulic fracturing operations. The minimal access road length makes wetting down the road and location for dust suppression very manageable on high-wind days. The access road will not be paved. The existing access road will be upgraded, and the new portion of the road will be crowned (with a minimum of 4 inches of gravel) and ditched, as agreed to by the private surface owner. Road surfacing material will consist of limestone, scoria or river rock or as agreed upon by the private surface owner and will be sourced as locally as possible to minimize travel distance.

5. Number of truck trips during the Construction, Drilling, Completion and Production stages:

Development State	Time Frame	Traffic Per Stage - Monthly
Surface Construction	28 Days	1000
Drilling	126 Days	749
Completion	91 Days	2806
Production	12510	524

6. Plan for Suppressing Fugitive Dust Caused by Wind:

- The natural topography due north of the proposed Bigfoot 11 location is a hill that will act as a natural windbreak against northerly winds for the access road and location.
- If wind conditions are such that work cannot be completed without creating fugitive dust, action will be immediately taken to apply water to all dust-creating surfaces.
- Regular road maintenance will be implemented to mitigate fugitive dust.
- Avoid unnecessary, dust-generating work on high wind days.
- Utilize gravel in high wind areas on specific portions of roads and wellpads.

7. Best Management Practices:

- Confluence will gravel all working surfaces and perform interim reclamation within six months of well drilling and completion.
- Utilize existing vegetation, trees slash or brush piles to cover disturbed areas not used for vehicle traffic.
- Application of fresh water to disturbed areas during construction and dry season.

- Applications of approved chemicals may be applied to areas not needed for traffic to form a less erodible soil.
- Operations will be confined to the wellpad working surface.
- Continuous monitoring of disturbed areas to evaluate additional BMPs needed.
- Fresh water or magnesium chloride application to graveled surfaced of the Location and associated roads.
- Speed limit signs will be posted per surface owner agreement.
- Contractors will be notified of speed limits if no signs are posted.
- Regular road maintenance such as grading and adding additional gravel as needed.