

Hayward 0993-25-09 Pad Colorado Parks and Wildlife Consultation Summary



1. INTRODUCTION

Laramie Energy, LLC (Laramie) (Operator # 10433) operates an Oil and Gas Location in Mesa County, Colorado. The Hayward 0993-25-09 Pad (Hayward Pad)(COGCC Location # 455725) is an existing well pad which constructed in 2019, but never drilled. Laramie is proposing to drill 13 wells at the existing well pad. The Location was constructed during the summer and fall of 2019 following the approval by the Director on June 29, 2018, of a Form 2A Oil and Gas Location Assessment (2018 Form 2A - Document No. 401579042). Due to economic conditions and the pandemic, Laramie was unable to drill the wells proposed in the original 2018 Form 2A. Gas pipelines and water gathering lines are installed to the edge of the pad's perimeter. Laramie does not anticipate any additional surface disturbance in order to drill the 13 wells.

PRELIMINARY ASSESSMENT

During preliminary planning of amending the Hayward Pad Form 2A, Laramie assessed map layers and third-party consultants conducted field evaluations. The Hayward Pad is located outside of COGCC mapped High Priority Habitats. However, an unnamed intermittent stream is located within 500 feet of the Hayward Pad. As part of the Operating Requirements of the COGCC 1200 Series, COGCC Rule 1202.a.(3) states, *"At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland."*

At the nearest point, an unnamed intermittent stream is located 170 feet from the existing working pad surface. The existing private access road is located between the Hayward pad and the unnamed intermittent stream at its nearest point. Established vegetation consisting of aspen trees with an understory of mixed mountain shrublands, grasses, and forbs exists between the Hayward pad and the unnamed intermittent stream as well.

The Hayward 0993-25-09 Pad is not located within any areas identified as High Priority Habitat (HPH) (COGCC 2022). Three (3) high priority habitats exist within a 1-mile radius of the Hayward working pad surface. While aquatic sportfish management water and cutthroat trout designated crucial habitat exist within 1-mile of the Hayward, none of these HPHs exist downgradient within 1-mile. The HPHs which are mapped within 1-mile of the Hayward Pad are topographically isolated from the subject pad.

2. CONSULTATION

Laramie Regulatory staff conducted a pre-application meeting with the CPW Northwest Energy Liaison. The Regulatory and Environment Manager for Laramie visited the site on April 5th, 2022, to assess site conditions. Due to the amount of snow and warming temperatures creating muddy conditions at the Hayward Pad, Laramie conducted the initial pre-application meeting on Teams. Videos and photographs taken on April 5th, 2022, to document the site and to present to CPW during the Teams Meeting.

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The initial pre-application meeting occurred on April 8th, 2022, on Teams was attended by the CPW Northwest Energy Liaison, Laramie Regulatory and Environment Manager, and Laramie Regulatory Specialist. Laramie and CPW conducted a pre-application consultation meeting to discuss the requested waiver and details of proposed operations. Laramie discussed their initial consideration to move production tanks greater than 500 feet from the intermittent stream; however, this would reduce acreage reclaimed during interim reclamation and would result in a larger Production Pad Surface. CPW and Laramie discussed the distance to the creek, physical barriers such as current vegetation and an existing private access road. Laramie presented a video following the access road, showing the proximity and conditions of the intermittent stream to the Hayward Pad. Additional videos and photographs of the Hayward Pad and surrounding area were presented during the Teams meeting. CPW and Laramie discussed stormwater features to be installed to reduce potential impacts. Laramie expressed that once weather conditions improved at the site, a pre-application onsite meeting would be conducted.

On April 25, 2022, Laramie provided CPW with a pre-application consultation and waiver request letter (**Attachment A**). The letter included proposed mitigation efforts to reduce potential impacts to the intermittent stream.

A pre-application onsite was conducted on May 16, 2022. Attendees included CPW, COGCC, environmental third-party contractor, Laramie regulatory representatives, Surface Owner, RBU owner, and the local fire protection district. During the pre-application onsite consultation, CPW was able to observe existing stormwater control features, topography, and the intermittent stream. CPW, COGCC, and Laramie communicated on appropriate mitigation efforts, including additional stormwater controls, to protect the intermittent stream from impacts. Laramie proposed to install an emergency spill kit on location for any incidents that might occur for the life of the project. Laramie provided the pre-application onsite summary to CPW on May 19, 2022 (**Attachment B**).

3. CONCLUSION

CPW granted a waiver for COGCC Rule 1202.a(3) on May 26th, 2022. The written waiver (**Attachment C**) grants Laramie to locate chemicals storage tanks within 500 feet of the intermittent stream based on proposed best management practices, surrounding topography, and site-specific conditions.

Laramie has committed to implementing the following best management practices at the Hayward Pad.

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Mitigation Efforts and Best Management Practices for Waiver - Rule 1202.a.(3)

During interim reclamation stage, excelsior wattles will be installed along the bottom of area of disturbance to prevent any sediment from leaving the area of disturbance. During interim reclamation, the site will be accessed daily.

After interim reclamation activities, Laramie will construct a 2-foot-high earthen containment berm along the eastern and northern working pad surface perimeter to prevent liquids from leaving the site. Sediment traps will be strategically located and installed along the site-specific road and on the pad. During the initial production phase, regular visits will be conducted.

Laramie will install and maintain additional BMPs off Location. Once the conditions are right, Laramie will re-establish the borrow ditch on the west side of the main access road and install SW checks to capture sediment transfer and slow water velocity and dissipate the energy.

Facing North from Existing Main Access Road



A fully equipped emergency spill response trailer will be staged at the Sup and Shep 25-11 *(Location ID 334440 and the pad nearest the Hayward) and prepared for immediate response in the event of the release or spill during pre-production activities. A second emergency spill response trailer will be available for immediate mobilization if needed at LE's Harrison Creek Water Treatment Facility approximately 3.0 miles from the Hayward location.

An emergency spill kit (95-gallon drum spill kit) will be placed on the pad for any spills that might occur for the life of the producing wells.

In accordance with COGCC Rule 427.c.(2), LE will only utilize fresh water to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body.

*Due to the amount of equipment to be located on the Hayward Pad during completion operations, Laramie was concerned the spill response trailer might be blocked and not accessible in the event spill occurred on the Hayward Pad. Laramie determined the spill

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response trailer would be fully accessible located at the adjacent pad, the Sup and Shep 25-11 Pad.



ATTACHMENT A

CPW Pre-Application Letter and Waiver Request



Laramie Energy LLC
1700 Lincoln Street, Suite 3950
Denver CO 80203

TEL: (303) 339-4400

April 25, 2022

Mr. Taylor Elm
NW Region Energy Liaison
Colorado Parks and Wildlife
711 Independent Ave.
Grand Junction, CO 81501

RE: Pre-application Consultation and Rule 1202.a.(3) Waiver Request

Location: Hayward 0993-25-09 Pad
Location ID: 455725
Legal Desc: SENE of Sec 25, Twn. 9S, Rng. 93W, 6th P.M.
Coordinates: Lat: 39.244777°; Long: -107.715744°

Elevation: 8006 feet
County: Mesa

Mr. Elm,

Laramie Energy (LE) is in the process of preparing an Oil and Gas Development Plan (OGDP) to re-permit the existing Hayward 0993-25-09 Pad (Location #455725), located in Mesa County, Colorado. LE is proposing to re-permit the pad from the original 22 permitted wells to 13 new natural gas wells.

The existing location and wells were originally permitted in 2018 and construction of the pad, road, gas and water lines commenced in Summer and Fall of 2019 in anticipation of a 2020 drill and complete date. But, due to the pandemic and economic conditions, the original 22 permitted wells were not drilled. The total area of disturbance is 6.3 acres and working pad surface of 3.4 acres. Other than gravelling of the pad and road, the site is "ready to go" once all permitting and approvals are acquired. A closed loop drilling system would be utilized during the drilling of the wells. The wells would be drilled and completed in compliance with appropriate COGCC and CDPHE Rules and Regulations.

Interim reclamation would commence within 6 months (weather permitting) after all wells are drilled and completed and production facilities are installed on pad. During interim reclamation, the cut and fill slopes will be reshaped and contoured, reclaiming approximately 4.1 acres. The long-term disturbance associated with this pad will be 2.7 acres for the production phase (2.1 acres for Production Pad Surface and 0.6 acres for the access road). The site would be seeded with a seed mix approved by the landowner or a mix approved by the Bureau of Land Management for the plant community for the altitude.

High Priority Habitat

The Hayward 0993-25-09 Pad is not located within any areas identified as High Priority Habitat (HPH) (COGCC 2022). Three (3) high priority habitats exist within a 1-mile radius of the Hayward working pad surface. While aquatic sportfish management water and cutthroat trout designated crucial habitat exist within 1-mile of the Hayward, none of these HPHs exist downgradient within 1-mile. The HPHs which are mapped within 1-mile of the Hayward Pad are geographically isolated from the subject pad.

Waiver Request

Laramie is requesting a waiver from COGCC Rule 1202.a.(3). *At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark (“OHWM”) of any river, perennial or intermittent stream, lake, pond, or wetland.*

The Hayward Pad is located within 500 feet of a downgradient intermittent stream and two man-made stock ponds. During initial planning of development, Laramie examined the placement of chemical storage outside of the 500 ft buffer. However, this layout would prevent Laramie from reclaiming 4.1 acres after pre-production operations. Laramie seeks a waiver to allow refueling during drilling activities and chemical storage during pre-production and production phases within 500 feet of these surface water features. WestWater Engineering, Inc. (WWE) conducted a wetlands evaluation in December of 2021. WWE field-verified that no wetlands are directly downgradient of the Hayward Pad. WWE’s Assessment and Surface Hydrology Map (Date March 7, 2022) is provided.

At the nearest point, the unnamed intermittent stream is located 170 feet from the working pad surface. The existing private access road to LE’s current operations and adjacent landowners is located between the Hayward pad and the unnamed intermittent stream at its nearest point. Established vegetation consisting of aspen trees and understory of mixed mountain shrublands, grasses, and forbs exists between the Hayward pad and the unnamed intermittent stream as well.

Photo 1. Unnamed Intermittent Stream within 500 feet of Hayward Pad



Leak Detection Monitoring

During drilling, completions, and flowback operations, personnel will be located onsite fulltime (24 hours a day, seven days a week). The consistent presence of personnel on location will allow for fluids to be continuously monitored. During production, tanks will be equipped with dedicated continuous monitoring through a SCADA platform at the Hayward Pad for remote monitoring, alerting, and shut-in capabilities. Laramie's SCADA system, which provides real-time fluid level data, will allow for continuous monitoring of tank volumes.

Proposed Production Tanks - Hayward 0993-25-09 Pad

Oil Tanks			Produced Water Tanks			Gunbarrel Tanks		
# of Tanks	Vol. Per Tank (bbls)	Total Vol. (bbls)	# of Tanks	Vol. Per tank (bbls)	Total Vol. (bbls)	# of Tanks	Vol. Per tank (bbls)	Total Vol. (bbls)
1	400	400	2	400	800	1	400	400

Total tank capacity will be 1600 barrels. Tanks will be installed within secondary containment with a 150% capacity at the Hayward Pad. The containment will consist of a spray-in liner, which is more durable and has a longer lifespan than poly-liner. The spray-in liner will minimize potential spill incidents and impacts.

LE had originally planned for installation of eight (8) tanks (total storage capacity of 3,200 barrels) at the Hayward Pad. Due to the reduced number of planned wells, the number of tanks was reduced to four (4) tanks at the Hayward since the Hayward has an existing produced water line tied into LE's Harrison Creek Water Treatment Facility (HCWTF) (Location ID # 413056). By reducing the fluid storage capacity at the Hayward pad, LE is further reducing the risk from spills.

During completions, a temporary surface line will be installed and utilized to supply produced water for completion of each well. The water line will be located along the site-specific access road towards the existing Sup and Shep 25-11 Pad (Location ID 334440). The water line will be 10 to 12-inch poly and will be continuously monitored by onsite personnel. Completions and flowback activities will last approximately 48 days, after completions Laramie will remove the temporary surface water line and reclaim and seed any areas of the alignment that might have been impacted.

Mitigation Efforts

The Hayward Stormwater Management Plan identifies operating procedures that comply with the requirements set forth by Colorado Department of Public Health and Environment (CDPHE) and Water Quality Control Division for controlling stormwater discharges associated with construction activity. Installation, maintenance, and inspection of stormwater BMPs minimize the potential for erosion, sedimentation or the discharge or pollutants.

During interim reclamation stage, excelsior wattles will be installed along the bottom of area of disturbance to prevent any sediment from leaving the area of disturbance. During interim reclamation, the site will be accessed daily.

After interim reclamation activities, Laramie will construct a 2-foot-high earthen containment berm along the eastern and northern working pad surface perimeter to prevent liquids from leaving the site. Sediment traps will be strategically located and installed along the site-specific road and on the pad. During the initial production phase, regular visits will be conducted.

Laramie will install and maintain additional BMPs off Location. Once the conditions are right, Laramie will re-establish the borrow ditch on the west side of the main access road and install SW checks to capture sediment transfer and slow water velocity and dissipate the energy.

Photo 2: Facing North from Existing Main Access Road



Vegetation communities immediately surrounding the well pad are comprised of mature aspen woodlands with an understory of mixed mountain shrublands. Mountain shrublands present in the understory include: chokecherry (*Prunus virginiana*), serviceberry (*Amelanchier utahensis*), mountain snowberry (*Symphoricarpos oreophilus*), and Rocky Mountain maple (*Acer glabrum*), along with native grasses and forbs. Existing vegetation surrounding the well pad acts a barrier to further reduce sediment discharge or fluids from reaching the unnamed intermittent creek from the well pad.

In accordance with COGCC Rule 427.c.(2), LE will only utilize fresh water to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body.

Photo 3. Established Vegetation between Hayward Pad and Unnamed Intermittent Stream Facing Southeast – Photo taken West of the Hayward Pad



A fully equipped emergency spill response trailer will be staged onsite, prepared for immediate response in the event of the release or spill. A second emergency spill response trailer will be available for immediate mobilization if needed at LE's Harrison Creek Water Treatment Facility approximately 3.0 miles from the Hayward location.

Request For Waiver

Laramie is requesting the CPW's consideration of a waiver from COGCC Rule 1202.a.(3). *At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland.*

Please feel free to contact me at 970-812-5310 with any questions the CPW might have.

Thank you,

Wayne P. Bankert
Reg & Env. Manager
Laramie Energy, LLC
wbankert@laramie-energy.com

CC: Denver
ATT: Hayward Layout Drawings with Stormwater BMPs
Hayward Wildlife Maps
Hayward Hydrology Maps
Hayward Wetlands Evaluation
2018 BLM Environmental Assessment



ATTACHMENT B

Pre-Application Onsite Summary

From: [Katy Middleton](#)
To: molly.west@state.co.us; [Taylor Elm - DNR](#); danielle.neumann@state.co.us; [Dave Kubeczko - DNR](#); [Amie Wilsey](#); l.galloway@pvfiredept.org; m.lockwood@pvfiredept.org
Cc: [Wayne Bankert](#)
Subject: Hayward 0993-25-09 Pad Pre-Application Consultation Onsite Summary
Date: Thursday, May 19, 2022 12:30:00 PM
Attachments: [Hayward Onsite Pre-Application Consultation 05.16.22.pdf](#)

To All,

Thank you very much for attending the onsite meeting at the Hayward Pad on May 16th, 2022. Please find attached the summary of the Hayward Pad onsite. Please do not hesitate to contact myself or Wayne Bankert with any questions.

Wayne Bankert | Regulatory & Environmental Manager

wbankert@laramie-energy.com

Direct: 970.812.5310

Sincerely,

Katy Middleton | Regulatory Specialist



760 Horizon Drive., STE 101
Grand Junction, CO 81506
kmiddleton@laramie-energy.com
Cell: 970.985.8240



Pre-Application Consultation Onsite Summary May 16, 2022, 1PM

Attendees:

Laramie Energy, LLC: Wayne Bankert, Katy Middleton, and Rory Mortensen
DRG: Tad Sherrill
WestWater Engineering: Amie Wilsey
CPW: Taylor Elm, Molly West, and Danielle Neumann
COGCC: Dave Kubeczko
Surface Owner: Monty and Lisa Searle
Adjacent Landowner and RBU owner: Jeff and Tonja Leany
Plateau Valley Fire District: Larry Galloway and Mike Lockwood (Fire Chief)

All attendees received the current Layout Drawings (date May 12th, 2022), an aerial Wildlife Habitat Map, Surface Hydrology Map, and Cultural Distances Figure.

OGDP Summary

Laramie Energy, LLC (Laramie) is preparing an OGD application for the existing Hayward Pad. The Hayward 0993-25-09 Pad (Hayward Pad) is located on private property, owned by Monty and Lisa Searle (attended the onsite). The Hayward Pad is an existing well pad that was constructed but never drilled. The previous approved Form 2A expired on June 28, 2021. The original Form 2A (Document # 401579042) proposed the development of 22 wells. Laramie is proposing to drill 13 wells in the 2022 Hayward 0993-25-09 OGD (2022 Hayward OGD), reducing the number of wells to be drilled at the Hayward Pad from the original Form 2A.

Due to the proximity to an unnamed intermittent stream, Laramie is requesting a waiver from CPW for Operating Requirement Rule 1202.a.(3). At the nearest point, the unnamed intermittent stream is located 170 feet from the working pad surface.

COGCC Rule 1202.a.(3). *At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland.*

Resource Surveys

- Environmental Assessment, June 2018. Prepared for federal wells proposed in the original Hayward 0993-25-09 Pad Form 2A. The original Form 2A include Federal minerals. Only fee minerals will be developed for wells proposed in the 2022 Hayward 0993-25-09 OGD.
- Wetlands Evaluation: Prepared by WestWater.

Onsite Meeting and Discussion

Most attendees met at the entrance of Harrison Creek Road before proceeding to the Hayward Pad. Upon arrival of the Hayward Pad, attendees introduced themselves. Wayne

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2022 Hayward 0993-25-09 OGD
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presented a summary of the history of the Hayward Pad and operations proposed in the 2022 Hayward OGD. Wayne stated that 13 fee wells are proposed and the proposed OGD would not result in any additional surface disturbance. Wayne pointed out where the existing gas pipeline and water gathering lines are installed. Wayne stated that a temporary surface line for completions and flowback operations will be utilized and the temporary surface line will be laid in the cut shoulder of the existing road to prevent additional disturbance.

Mr. Leany (the owner of the only RBU within 2000-foot radius of the Hayward Pad) stated that he recently drilled a water well (Year 2021) and was wondering about potential impacts. Mr. Leany's water well is drilled to 520 ft below ground surface (Well Permit 319089) and water was measured at 430 feet below ground surface. Wayne explained the surface casing in this area is set from 1000 feet to 1500 feet below ground level. Wayne followed up after the site visit and verified surface casing was set and cemented at 1500 feet on the wells drilled on the adjacent pad. The surface casing is cemented to surface and protects surrounding groundwater from potential impacts. Mr. Seale stated that he has applied for a water well permit as well.

Wayne discussed how the Hayward Pad will be tied into existing infrastructure, reducing truck traffic significantly. Recycled produced water used during completions will be pumped from the Harrison Creek Water Treatment Facility (Location ID # 413056) utilizing an existing water gathering line which will be connected to the temporary surface water line. Flowback water will be transferred from the Hayward Pad to the Harrison Creek Water Treatment Facility via existing buried water gathering line. For production, produced water will also be transported via buried water gathering line which exists at the pad's perimeter.

The group walked around the perimeter of the working pad surface to observe the pad and area of disturbance. Katy Middleton discussed with CPW that the High Priority Habitats within one mile radius of the Hayward Pad were geographically isolated from the site. A ridge to the east and north separates the aquatic habitats from the pad; therefore, the HPHs are not downgradient of the site.

CPW discussed stormwater controls for the Hayward Pad site-specific access road. Laramie stated that in addition to the existing stormwater controls, prior to any drilling activities the pad and site-specific access road would have gravel applied. Laramie plans to apply at least 6-inches of gravel to the working pad surface and site-specific access road. Mr. Sherrill of DRG stated the site-specific road will be crowned and sloped to route stormwater to the west (away from the intermittent stream).

The distance and direction to the only RBU within 2000-foot radius was discussed. A large cut slope exists in the direction of the RBU. The RBU was not visible from the site. The placement of cuttings, depicted on the Layout Drawings, was examined on the Pad. COGCC recommended the Operator review Rule 905.a.(3) for guidance on beneficial reuse.

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The Plateau Valley Fire Protection District asked the size of the current pad and Wayne stated 3.4 acres for the working pad surface. Wayne discussed that Laramie considered moving production tanks and equipment to the western corner of the pad to remain outside the 500-foot buffer from an intermittent stream, which would prevent Laramie to reclaim most of the pad. Wayne explained by installing the production equipment near the entrance of the pad, Laramie will be able to interim reclaim the Hayward Pad to the fullest possible extent.

Vegetation was visible on the topsoil berms that surrounded the pad. COGCC suggested that Laramie install stormwater control features between the topsoil berm and above the cut slope on the southern perimeter of the pad. The construction of a ditch or excelsior waddles was discussed. CPW requested Laramie to provide the proposed seed mix for interim reclamation.

Katy Middleton stated the spill response trailer would be staged at the Sup and Shep 25-11 (Location ID 334440), the pad nearest the Hayward. Originally Laramie had planned on staging spill response trailer on the Hayward Pad during pre-production operations. However, due to the amount of equipment required during drilling and completions, Laramie determined the spill response trailer would be more accessible if staged at the Sup and Shep. A second emergency spill response trailer will be available for immediate mobilization if needed at LE's Harrison Creek Water Treatment Facility approximately 3.0 miles from the Hayward location. Laramie is also considering the installation of a spill response kit at the Hayward Pad.

Action Items.

- Provide CPW proposed seed mix.
 - On May 17, 2022, Laramie provided the BLM seed mix via email to the CPW Northwest Region Energy Liaison.
- Stormwater control features between existing vegetated topsoil pile and existing cut slope along the southern perimeter.
 - The construction of a ditch was discussed. After the onsite, Laramie examined the shelf of the cut slope and determined it would not be safe for heavy equipment to access the topsoil of the cut slope nor to disturb the established vegetation between the topsoil pile and cut slope. Instead of a ditch, Laramie is proposing to install an excelsior wattle between the topsoil and top shelf of cut slope.
 - The excelsior wattle will be installed prior to the Form 2A submittal.
 - Laramie is revising the Hayward Pad Layout Drawings to reflect the installation of the additional excelsior wattle.



ATTACHMENT C

CPW Waiver and Email Correspondence

From: [Taylor Elm - DNR](#)
To: [Katy Middleton](#)
Cc: [Wayne Bankert](#); [Molly West - DNR](#)
Subject: Re: Hayward 0993-25-09 Pad Pre-Application Consultation Onsite Summary
Date: Thursday, May 26, 2022 12:17:07 PM
Attachments: [image.png](#)
[Laramie Hayward 25-09 Pad CPW Pre-App Consult-signed.pdf](#)

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Katy & Wayne,

Thank you for providing this updated information and attachment following our May 16th, 2022 pre-application on-site consultation meeting. I have reattached your earlier letter requesting a waiver from Colorado Parks and Wildlife to COGCC Rule 1202.a.(3). This provision is a statewide operating requirement that states, "*Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland.*"

CPW understands that Laramie Energy is requesting to locate the Hayward 0993-25-09 pad's production tanks within 500 ft. of the adjacent unnamed ephemeral drainage so that more of the working pad surface can be reclaimed during interim reclamation. Additionally, Laramie is requesting to locate chemical storage tanks within 500 ft. during drilling and completions activities. Rule 1202.a. states that: "*The operating requirements identified in this Rule 1202.a. apply to Oil and Gas Operations statewide unless the Operator obtains a signed waiver from CPW and the Director or Commission approves a Form 4, Sundry Notice or Form 2A documenting the relief.*" After reviewing all of the proposed best management practices, topographic considerations, and other site-specific conditions, CPW staff agrees that a waiver from this statewide operating requirement is appropriate. Given the measures that will be implemented and outlined within the attached document, CPW does not anticipate any adverse impacts to the nearby waterway.

Please consider this email as your official "signed" CPW waiver to Rule 1202.a.(3). We appreciate the thorough communication and willingness to implement all of CPW's recommendations to avoid and minimize potential adverse impacts. If you should have any further questions or needs for additional information, please don't hesitate to contact me at (970) 987-9767 or by email at taylor.elm@state.co.us.

Sincerely,



On Tue, May 24, 2022 at 7:12 AM Katy Middleton <kmiddleton@laramie-energy.com> wrote:

Good Morning Taylor,

Thank you for the email. As an addendum to the Waiver Request and Laramie Onsite Summary, the following information and attachments are provided.

- Hayward Pad Layout Drawings (attachment)
 - The attached Hayward Pad Layout Drawings were revised to reflect the additional stormwater BMPs that were discussed on the onsite for the topsoil pile along the southern perimeter.
 - The Production Pad Surface was revised to 2.2 acres. Thus, the long-term disturbance will be 2.8 acres (2.2 acres for the Production Pad Surface and 0.6 acres for the site-specific access road)
- A spill response trailer will be staged at the Sup and Shep 25-11 (Location ID 334440), the pad nearest the Hayward. Originally Laramie had planned on staging spill response trailer on the Hayward Pad during pre-production operations. However, due to the amount of equipment required during drilling and completions, Laramie determined the spill response trailer would be more accessible if staged at the Sup and Shep.
- Laramie has committed to placing an emergency spill kit (95-gallon drum spill kit) at the Hayward Pad for any spills that might occur for the life of the producing wells.

Thank you, Taylor, for your time. Please do not hesitate to contact Wayne or myself with any questions.

Kindly,

Katy Middleton | Regulatory Specialist



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Grand Junction, CO 81506
[kmiddleton@laramie-
energy.com](mailto:kmiddleton@laramie-energy.com)
Cell: 970.985.8240

From: Taylor Elm - DNR <taylor.elm@state.co.us>
Sent: Monday, May 23, 2022 4:10 PM
To: Katy Middleton <kmiddleton@laramie-energy.com>; Wayne Bankert <wbankert@laramie-energy.com>
Cc: Molly West - DNR <molly.west@state.co.us>
Subject: Re: Hayward 0993-25-09 Pad Pre-Application Consultation Onsite Summary

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Hello Katy, and thanks for the onsite notes. Is the attached document still accurate and what Laramie intends to utilize for the Rule 1202.a.(3) CPW waiver request? I will respond with CPW's response, but wanted to make sure there weren't any needed revisions following the onsite? Also, I'm booked with on-sites the next couple of days, so my response will be later this week. Sorry for the delay on that.

Thanks!

On Thu, May 19, 2022 at 12:31 PM Katy Middleton <kmiddleton@laramie-energy.com> wrote:

To All,

Thank you very much for attending the onsite meeting at the Hayward Pad on May 16th, 2022. Please find attached the summary of the Hayward Pad onsite. Please do not hesitate to contact myself or Wayne Bankert with any questions.

Wayne Bankert | Regulatory & Environmental Manager

wbankert@laramie-energy.com

Direct: 970.812.5310

Sincerely,

Katy Middleton | Regulatory Specialist



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