

Emergency Response Plan – 304.c.(8)

Arco Deep 1-27 Oil and Gas Location

Loc ID #322539

December 2022



INTRODUCTION

TEP Rocky Mountain LLC (“TEP”) has developed the following Emergency Response Plan (“ERP”) to help Company Personnel quickly evaluate and effectively manage incidents and limit consequences related to operations at the Arco Deep 1-27 oil and gas location. Colorado Oil and Gas Conservation Commission (COGCC) permitting requires operators to submit an ERP under Rule 304.c.(8). This Plan utilizes an Incident Command System/Unified Command System (ICS/UCS) structure to assist in the management of major incidents. A summary of TEP’s comprehensive ERP is below and organized as listed in Table 1. TEP’s basin wide ERP is compliant with the requirements of COGCC Rule 602.j and is available upon request.

Table 1, Required Content for the Emergency Response Plan

1	Local response agency and contact
2	Date the plan was finalized and approved by the local response agency
3	Directions to the location
4	Location ingress and egress
5	Legal description
6	Operator emergency contact information
7	Mutual aid agencies
8	Local and mutual aid agency staffing
9	Site setting
10	Location layout
11	Equipment and stored material
12	Sensitive areas
13	Potential impacts, prevention, and mitigation
14	Response equipment
15	Health and safety action levels
16	Training coordinated with local responders

1. Local Response Agency and Contact

Table 2, Local Response Agency and Contacts

Agency	Contact	Contact Information
Garfield County Sheriff’s Office	Chris Bornholdt	Emergency 911
	Emergency Operations	Office Phone 970-945-0453
	Commander/Manager	

2. Date the Plan was Finalized and Approved by the Local Response Agency

TEP’s field wide emergency response plan was coordinated with the local emergency response manager, Chris Bornhodt, and approved on April 6, 2021.

3. Direction to the Location

Beginning at the City of Parachute Exit (Exit 75) head north on County Road 215 approximately 7.23 miles, turn left (west) onto Garden Gulch road (lease road) and proceed for approximately 6.17 miles to the Y

intersection with the Garden Gulch Extension road (lease road), at the Y intersection, stay left on the existing gravel road (lease road) and proceed southwesterly, northwesterly, and then westerly for approximately 3.33 miles to the intersection with a gravel road (lease road), turn left on the gravel lease road in a southwesterly direction for approximately 1.58 miles to the Arco Deep 1-27 pad.

Location Coordinates
 Latitude: 39.492476505
 Longitude: -108.207807651

4. Location Ingress and Egress

The existing access road to the existing Arco Deep 1-27 pad will provide ingress and egress to the oil and gas location. The existing access road, located northeast of the pad location, will be improved during the reconstruction of the pad to ensure sufficient access and to accommodate the increase in vehicle traffic.

5. Legal Description

Township 6 South, Range 97 West, 6th P.M.
 Section 27: NE¼SW¼
 Garfield County, Colorado

6. Operator Emergency Contact Information

Table 3, Operator Emergency Contact Information

Role	Contact	Contact Information
Operations	Nate Lenard, Supervisor	970-263-2789
	Brandon Baker, Superintendent	970-260-8361
EHS/Safety	Laura Lancaster, Health & Safety Manager	970-248-6845
	Kevin McDermott, Safety Spvrs.	970-309-1195
	Delbert Dowling, Safety Spc.	970-589-5736
Land	Bryan Hotard, Landman	970-361-2006

7. Mutual Aid Agencies

Table 4, Mutual Aid Agencies

Agency	Contact	Contact Information
Colorado River Fire Rescue District	Leif Sackett, Chief Colorado River Fire Rescue	Emergency 911
		Non-Emergency 970-625-8095
		Rifle Office Phone 970-625-1243

8. Staffing of Local and Mutual Agencies

The Garfield County Sheriff’s Office is under the authority of Sheriff Lou Vallario. Under the Sheriff and Garfield County government, the Garfield County Emergency Operations Plan (EOP) outlines how the county government complies with and implements the requirement of the Colorado Division of Emergency Management to protect the lives and property of the citizens of the county. The county EOP serves as a bridge between the Local Municipal Emergency Operations Plan and the State of Colorado Emergency

Operations Plan. The EOC Manager coordinates with multiple agencies, including fire protection districts in support of emergency response and management.

9. Site Setting

The Arco Deep 1-27 OGDG is located in the vicinity of existing oil and gas infrastructure in rural Garfield County, Colorado. There are four (4) active Oil and Gas Locations within one (1) mile of the existing Arco Deep 1-27 pad (COGCC Loc ID: 322539). The Arco Deep 1-27 pad is located on private surface owned by Allen Kelton within the NE¼SW¼ of Section 27, Township 6 South, Range 97 West, 6th P.M., Garfield County, Colorado. Garfield County has a zoning designation of Rural for the property. The current land use for this property is considered rangeland / recreational. The property in the immediate vicinity of the Oil and Gas Location is primarily used for ranching and recreation, including hunting.

10. Location Layout

The expanded 6.451-acre Arco Deep 1-27 pad will be reconstructed to support drilling, completion, and long-term production operations of the sixteen (16) proposed natural gas wells. The long-term disturbance of the production pad following interim reclamation will be approximately 1.269-acres. Please see the Layout Drawing included as an attachment to the Form 2A for additional site details.

11. Equipment and Stored Materials

TEP will install wellhead telemetry and other wellhead specific equipment on the Arco Deep 1-27 pad to support production of the proposed wells. TEP will also install production facilities, including separators, tanks, and Enclosed Combustion Devices (“ECD”), on the Arco Deep 1-27 pad to effectively produce the proposed wells. Eighteen (18) separators (4 quad separators, 1 single separator, and 1 low pressure separator) will be installed along the southwest side of the pad within a ninety-five-foot (95’) long by thirty-foot (30’) wide area. Two (2) five-hundred-barrel (500bbl) condensate tanks, six (6) five-hundred-barrel (500bbl) produced water tanks, and one (1) five-hundred-barrel gun barrel tank, used for well blowdown and pipeline venting operations, will be installed within an eighty-five-foot (85’) by forty-foot (40’) lined steel containment structure along the south side of the pad. The tank battery will be installed with a minimum of seventy-five feet (75’) setback from the proposed separators, wellheads, and ECD. Three (3) ECDs will be installed on the pad seventy-five-feet (75’) south of the proposed tank battery to control emissions. The two (2) existing four-hundred-barrel (400bbl) produced water tanks, one (1) three-hundred-barrel (300bbl) condensate tank, and existing containment structures will be removed from the location and replaced with the proposed tanks described above.

Table 5, Production Equipment Details

Pad Name	Equipment Description	Equipment Count	Capacity	Status	COGCC Class
Arco Deep 1-27 Pad	Wells (Total)	17	NA	Existing & Proposed	Major Equipment
	Quad Separators	4	NA	Proposed	Major Equipment
	Single Separators	1	NA	Proposed	Major Equipment
	Low Pressure Separator	1	NA	Proposed	Major Equipment
	Air Compressor / Generator Set	1	NA	Proposed	Major Equipment
	Produced Water Tanks	6	500bbl	Proposed	Major Equipment
	Condensate Tanks	2	500bbl	Proposed	Major Equipment
	Gun Barrel Tanks	1	500bbl	Proposed	Other Permanent Equip.
	Produced Water Transfer Pumps	1	NA	Proposed	Other Permanent Equip.

Pad Name	Equipment Description	Equipment Count	Capacity	Status	COGCC Class
Arco Deep 1-27 Pad	Dual Fuel Generator	1	NA	Proposed	Other Permanent Equip.
	Enclosed Combustion Devices	3	NA	Proposed	Major Equipment
	Chemical Pumps	5	NA	Proposed	Other Permanent Equip.
	Chemical Tank	4	500gal	Proposed	Other Permanent Equip.

12. Sensitive Area

The Arco Deep 1-27 pad is located in Garfield County, Colorado in the vicinity of existing oil and gas well pads and infrastructure. There are no residential buildings within 2,000 feet of the oil and gas location, and there are no day care centers, or schools within 1-mile of the oil and gas location.

The disturbance boundary of the proposed oil and gas location and existing access road are within Greater Sage Grouse General Habitat Management Area. The proposed pipeline corridor also crosses through a short section of Greater Sage Grouse Priority Habitat Management Area. On August 16, 2022, TEP conducted a pre-application consultation meeting with Colorado Parks and Wildlife (“CPW”) to discuss the proposed development plan for the Arco Deep 1-27 pad and the potential impacts to wildlife as a result of construction operations of the proposed facility and drilling and completion operations. During the pre-application consultation meeting, CPW agreed that the proposed timing for operations from May 2023 through April 2024 would be acceptable for this application based on proximity active sage grouse lek sites and best available greater sage-grouse activity data. Appropriate Best Management Practices have been included in the Wildlife Plan attached to the Form 2A.

There were no springs or seeps identified within 1-mile of the location during pre-application review. The existing Arco Deep 1-27 pad is located approximately 230 feet north to an unnamed dry intermittent drainage. In addition, the location is 305 feet south of a second unnamed dry intermittent drainage and 739 feet west of a third unnamed dry intermittent drainage. Stormwater control measures will be implemented around the perimeter of the location to minimize the potential for off-site migration of sediment and potential spills or releases. The location is located outside of the 100-year flood plain. Arco Deep 1-27 pad is located greater than 15 stream miles from the nearest active down gradient Public Water Supply Intake. There are no GUDI wells, Type III Aquifer Wells, or COGCC Rule 411 Buffer Zones within 0.5-mile of the Oil and Gas Location. The Arco Deep 1-27 pad is designated as being in a sensitive area based on proximity to surface water features.

13. Potential Impacts, Prevention, and Mitigation

The Arco Deep 1-27 Oil and Gas Location will be reconstructed to provide the necessary working surface to support safe and efficient working conditions for all TEP employees and contractors during every phase of development, including drilling, completions, and production operations of the sixteen (16) proposed natural gas wells and the one (1) existing natural gas well.

Prior to commencement of construction activities, TEP will hold a pre-construction meeting with contractors to review proposed site construction and installation of stormwater control measures, and conditions of approval included in the approved permits and ROWs. The site will be staked for construction prior to the preconstruction meeting. Staking will identify the boundaries of the proposed site to protect existing vegetation in areas that should not be disturbed. Vehicular traffic will be minimized as much as possible to reduce nuisance dust and prevent soil erosion, any trash generated during the project will be disposed of properly at a commercial disposal facility, and any chemicals used will be kept to a minimum.

No cumulative adverse impacts are anticipated in the development of the Arco Deep 1-27 oil and gas location and associated facilities for air resources, public health, water resources, terrestrial and aquatic wildlife resources, soil resources, or public welfare. A description of the potential impacts, prevention and mitigation are outlined in the Cumulative Impact Plan and other plans attached to the Form 2A.

14. Response Equipment

Occasionally, spills of production fluids may occur during oil and gas operations (drilling, completion, and production) that result in localized impacts to soils on or near the well pad. TEP will stage a spill response trailers at the existing TR 41-35-597 pad (Loc ID: 335750), located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 35, Township 5 South, Range 97 West, 6th P.M., and at the TEP Operations Center, located north of Parachute, CO, which will have supplies available for immediate response to spills or releases during operation on the Arco Deep 1-27 oil and gas location. Well telemetry equipment will be installed to minimize site visitation through remote monitoring of production operations and aid in proactive response to well operation.

15. Health and Safety Action Levels

Incident Classification: TEP uses a tiered system of classification for incidents in rising levels of serious impact. Incidents are classified as:

- Near Miss (does not require use of the Emergency Response Plan)
- Minor Event
- Significant Event
- Serious Event
- Major Event

Purpose: Emergency response management describes the tactical actions taken to directly mitigate an emergency and protect human life, health, environment, and/or property from the physical impact of an event.

The TEP ERP specifically applies to E&P Production located in Garfield and Rio Blanco Counties. The ERP includes details on how to:

- Categorize the incident's impact on an increasing scale
- Create a safer environment for the facility
- Isolate the area/facility
- Establish evacuation routes and meeting locations
- Identify medical and rescue responsibilities for trained employees
- Establish methods for reporting fires and other emergency events
- Provide labor, materials, and equipment
- Identify emergency shutdown procedures for affected equipment
- Handle hazardous substances
- Establish and maintain adequate notification and communication with governmental agencies (fire, police, public officials, etc.)

Scope: The procedures outlined in the ERP were developed under the assumption that local fire protection and emergency response agencies will respond to emergencies at the TEP site when notified and will assist to the extent of their respective capabilities.

The ERP provides procedures for communication with employees, governmental agencies, and the public during emergencies to assure an effective response during an emergency.

The plan can be followed when responding to various incidents/events, including but not limited to the following:

(a) Natural disasters and severe weather conditions including:

- Floods
- Damaging storms (tornadoes, hurricanes)
- Earthquakes
- Weather extremes (cold, blizzards, heat)
- Lightning
- Wildfires

(b) Disruption to normal operations:

- Hazardous material / chemical releases from stationery or mobile sources
- Unscheduled valve closure or safety equipment shutdown, or any unscheduled emergency shutdown
- Major accidents involving TEP vehicles or equipment owned by contractors
- Bomb threats or other security events
- Threats against employees or TEP facilities
- Fatalities or multiple hospitalizations involving employees, contractors, or members of the public
- Disturbances on TEP property
- Damage to TEP property that interferes with the performance of normal business
- Disruption of service to customers (scheduled or unscheduled)

(c) Catastrophic failure and/or damage:

- Major fire
- Major environmental release
- Significant destruction of a facility

Health and Safety: The ERP reflects TEP's health and safety policies and procedures. When the site/facility, or a portion of the facility, is involved in an emergency event, Company Personnel shall take the appropriate action to safeguard human life and protect the public, the environment and surrounding property, and to maintain or restore operations if possible.

Field personnel must immediately communicate information about any emergency event to their supervisor. The supervisor will immediately initiate appropriate notification procedures. In the event a supervisor cannot be reached, field personnel will initiate necessary notifications.

16. Training Coordinated with Local Responders

TEP is a member of the Garfield County Local Emergency Planning Committee (LEPC) and the Garfield County Public Safety Council (PSC). Both groups provide a forum to discuss current oil and gas issues and concerns. Oil and gas emergency response plans are periodically reviewed. In addition, historical industrial accidents are routinely reviewed and discussed. National Incident Management System (NIMS) training has been provided through the LEPC.

Pursuant to COGCC Rule 602.j, TEP Rocky Mountain LLC's basin wide ERP has been reviewed and approved by the following local emergency response agency.

APPROVAL:



Chris Bornholdt
Emergency Operations Commander
Garfield County Sheriff's Office

April 6, 2021