

**STORMWATER MANAGEMENT PLAN**

**WAVETECH HELIUM, INC.**  
**UPRC #1 EIGER 14-11**  
**Cheyenne County, Colorado**

SECTION 11, T12S, R43W

Cheyenne County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application, as required by Rule 304.c.(15),  
and consistent with the requirements of Rule 1002.f.

April 11, 2023

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## 1. INTRODUCTION

Wavetech Helium, Inc.'s (Wavetech's) proposed UPRC #1 Eiger 14-11 Pad (Site) is located in Section 11, Township 12 South, and Range 43 West in Cheyenne County, Colorado. The proposed Location is on fee surface with a total Site disturbance of 3.5 acres, which includes the active working pad surface area of 2.1 acres. During interim reclamation and the production phase, 2.3 acres will be reclaimed, leaving a disturbed production area of 1.2 acres.

## 2. SITE DESCRIPTION

Wavetech currently owns or leases oil and natural gas mineral rights in Cheyenne County, Colorado. The Site will be approximately 3.5 acres in size, including an access road. The project area includes site-specific access roads, well pad, and a flow line that tie into the Ladder Creek Pipeline. A map of the permitted area is provided as Attachment 1.

The development of this conventional well that will produce fluids and gas, including helium, is generally accomplished in five distinct work phases. The first phase is access road and pad construction, the second phase is re-entry, the third phase is completion, the fourth phase is interim reclamation, and the fifth phase is abandonment with final reclamation. Each work phase is briefly discussed below.

### 2.1. PROPOSED SEQUENCE OF MAJOR ACTIVITIES

Access Road and Pad Construction	<p>Pad and access road construction will be performed using conventional cut and fill construction. The proposed access road for the UPRC #1 EIGER 14-11 well pad will tee off of CO RD 52 to the east before turning north for approximately 684 feet to the well pad. The road is anticipated to be approximately 50 feet wide, and no cut or fill is anticipated for the access road aside from grubbing, clearing, grading, and stabilization.</p> <p>The pad construction will involve clearing and grubbing, the removal of topsoil from the disturbed area to a stockpile along the southern boundary of the disturbed area, grading, compaction, contouring, and installation of road base as a surfacing material. To the extent possible, permanent control measures such as berms, diversion ditches, and sediment traps will be utilized to control stormwater throughout the life of the facility during this phase.</p> <p>Well pad construction will require an engineered cut on most of the eastern side of the pad and fill on the west side to level the pad for operations. Sediment discharge and small amounts of mobile equipment lubricant and fuel are the main potential pollutants of concern during access road and pad construction</p>
Re-Entry	<p>Re-entry for the UPRC #1 EIGER 14-11 well will include the mobilization of the rig and associated equipment, storage of chemicals and fuel, re-entry activities, including the installation and cementing of well casing, and demobilization of the</p>

	<p>rig and associated equipment.</p> <p>Sediment discharge, releases of unused and used chemicals, petroleum products, drilling water/mud, and drill cuttings are potential pollutants of concern during this phase of construction. Fresh water and drilling mud (including chemical additives) will be stored on the pad, typically in large tanks or skid-mounted vertical tanks. Drilling mud and associated materials are captured in tanks for reuse during closed-loop drilling processes. The drilling company will maintain a Spill Prevention Control and Countermeasure Plan.</p>
Completion	<p>Well completion may last up to 5 days and will involve perforating the Morrow Formation.</p> <p>Sediment discharge and releases of unused and used chemicals are potential pollutants of concern during this phase. As equipment is demobilized at the completion of this phase, the well pad and surrounding areas will be inspected to identify spills or leaks that may have occurred and may impact surface water so that those areas can be remediated.</p>
Production with Interim Reclamation	<p>While the lifespan of the UPRC #1 EIGER 14-11 facility covered in this SWMP may last up to 20 years, the actual productive life of the well will be dependent on the producing formation, location in the field, and proximity to other wells. The equipment found onsite during this phase will include:</p> <ul style="list-style-type: none"> <li>• One wellhead;</li> <li>• Ancillary equipment such as flow measurement equipment and flow lines;</li> <li>• One 300 bbl oil tank;</li> <li>• One 300 bbl produced water tank;</li> <li>• One gas meter;</li> <li>• One separator; and</li> <li>• One pump jack.</li> </ul> <p>Final stabilization of the disturbed area outside of the production area is generally achieved during this phase, with interim reclamation of 2.3 acres, leaving approximately 1.2 acres of working pad surface for production equipment and operations.</p>
Abandonment with Final Reclamation	<p>Once the UPRC #1 EIGER 14-11 well is deemed ready to abandon, the location will be recontoured and reclaimed to pre-disturbance conditions and/or in accordance with the surface owner's wishes.</p> <p>When the well is plugged and abandoned, the wellhead assembly will be removed and the well permanently plugged down hole. The equipment associated with the well will be removed from the location unless being used by other wells in the vicinity, and the flow lines and pipelines may be re-routed or abandoned as required.</p> <p>Following the removal of equipment from the well pad, the location and access roads will be recontoured and reclaimed to pre-disturbance conditions in accordance with COGCC final reclamation standards and/or in accordance with the</p>

	surface owner's wishes. Once it is recontoured, topsoil will be reapplied across the location in preparation for seeding and an appropriate seed mixture will be applied.
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### 3. ESTIMATE OF TOTAL SITE DISTURBANCE

The approximate Site disturbance is as follows:

**UNGRADED ELEVATION: 4165.4'**  
**FINAL ELEVATION: 4164.8'**  
**PROPOSED AREA OF DISTURBANCE: 3.5± ACRES**  
**AREA OF WORKING PAD SURFACE: 2.1± ACRES**  
**PROPOSED ACCESS DISTURBANCE: 0.8± ACRES**

### 4. NAME OF RECEIVING WATER(S)

The immediate receiving water is an intermittent stream approximately 1,466 feet west/southwest of the pad site, flowing to the south. The ultimate receiving water is the Big Timber Creek.

### 5. SUMMARY OF EXISTING DATA THAT DESCRIBE SOIL OR POTENTIAL FOR SOIL EROSION

Erosion potential is based primarily on-site topography, soil type, and vegetative cover. Using the Natural Resources Conservation Service (NRCS) Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov/app/>), topsoil for the site is classified as Keith-Ulysses silt loams, 1 to 4 percent slopes. The Keith-Ulysses silt loams complex is classified within Hydrologic Soil Type B. Hydrologic Soil Type B classifications are described as having a moderate infiltration rate when thoroughly wetted and consist of moderately deep to deep, moderately well to well drained soils with moderately fine to moderately coarse textures. Hydrologic Soil Type B classifications are described as having moderately low runoff potential.

### 6. DESCRIPTION OF EXISTING VEGETATION AND PERCENTAGE OF GROUND COVER

According to the National Land Cover Database, the majority of the project area is located in a "cultivated crops" area, as identified by the National Land Cover Database. Cultivated crops areas are areas used for the production of annual crops, such as corn, soybeans, vegetables, tobacco, and cotton, and also perennial woody crops such as orchards and vineyards. Crop vegetation accounts for greater than 20% of total vegetation. This class also includes all land being actively tilled.

There are no known weed infestations at this time. Specific vegetation data at the site is documented on the Routine Stormwater Inspection Form (Appendix C).

## 7. STORMWATER MANAGEMENT CONTROL MEASURES

Wavetech has assessed, and will continue to assess, potential pollution sources of stormwater runoff at a pad site. Wavetech will implement and maintain BMPs in accordance with good engineering practices, including measures such as:

- **Transportation of Chemicals and Materials:**
  - Tanks for the storage of fuel, chemicals, and other materials used in re-entry and completion activities will be on site through well completion. Loading and unloading of the tanks and releases of materials during these activities could potentially impact stormwater.
  - One 300 bbl oil tank and one produced water 300 bbl will be on site. The contents of these tanks will be transferred to a semi-truck via a connection hose when a pre-determined volume is reached. A drip container will be employed at the connection fittings to catch drips from any loose connections.
- **Vehicle and Equipment:**
  - Routine maintenance will be limited to fueling and lubricating equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance activities will be containerized and transported offsite for disposal or recycling. There will be no major equipment maintenance or overhauls conducted on site. Equipment will be transported offsite for major maintenance or overhauls.
- **Produced Water and Drilling Fluids Storage:**
  - A “closed loop” mud handling system will be utilized. Drill Cuttings, which will only be produced from drilling out the cement plugs, are mechanically separated, dried and stored in surface bins and then hauled offsite. Once they are tested and meet the disposal criteria, they will be transferred to a transport truck and hauled to a permitted disposal facility.

### **Outdoor Processing Activities and Machinery:**

- One vertical well, one pump jack, one 3-phase separator, one 300-barrel (bbl) oil tank and one 300-bbl produced water tank.
- **Erosion and Vehicle Tracking Controls:**
  - A diversion ditch will be utilized around the perimeter of the majority of the pad to control run-on (keep off-location sediment from coming on to the pad, which is typically very minimal) and to control sediment from running off the location during construction and interim stabilization. The ditches surrounding the north, west, and a portion of the south side of the pad will direct stormwater to a sediment trap on

the southwest corner inside of the pad berms. The diversion ditch also runs south from the northeast corner of the pad, around the topsoil stockpile, protecting the stockpile from erosion from stormwater.

- Earthen berms will be constructed on the northwest, west, and southwest sides of the pad to control sediment migration. No uncontrolled stormwater will be directed off the pad. A sediment trap will be constructed on the southwest corner of the pad. Diversion ditches will be graded to direct stormwater to the sediment trap, where sediment will settle, and water will be allowed to evaporate. Properly constructed and graveled roads provide the best off-site tracking control. The access road may have a track pad at the intersection with the nearby county road and the well pad will be surfaced with rock, as needed, to minimize offsite vehicle tracking. If tracking onto paved roads is observed, the roads will be cleaned by road scraping/sweeping or other means as necessary.

- **Disturbed and Stored Soil:**

- Disturbed soil and excavated materials will be stored on or next to the well pad within the construction area. Topsoil and other soil will be stockpiled separately and stabilized as needed. Topsoil stockpiles that will be exposed for more than six months will be mulched and/or seeded as a stabilization technique to control sediment loss.
- Excavated materials will be used as backfill when practicable. An exception may be excess rock generated by excavation activities. In these areas, some select backfill materials may be required to protect the project area. Excess rock may be pushed into rock filter dikes, used in energy dissipation zones below culverts, constructed into rock check dams within grassed swales, or distributed over a portion of the project area.
- Areas where construction activities that changed the natural topography occurred will be re-graded and contoured to blend into the adjoining landscape, and natural drainage patterns will be re-established to as near pre-disturbance levels as possible during reclamation.

- **Management of Contaminated Soil:**

- If contaminated soil is encountered at a Wavetech site during construction, additional BMPs will be employed to ensure containment of stormwater runoff. In addition, stockpiles of contaminated soil will be removed from the site and disposed of as soon as practicable, in accordance with environmental regulations. Please see Wavetech's Waste Management Plan for more details.

- **Ground Disturbing Maintenance Activities:**

- BMPs that are in need of maintenance or may be deemed inadequate for the situation and any deficiencies that are not immediately repairable will be reported to the

operator, or the designee for instructions on how to proceed, including, but not limited to, implementing new or modified BMPs to minimize potential pollutant discharges. Preemptive installation and proactive maintenance will be taken to prevent BMP failures and potential discharge of pollutants. There may be times field activities may require the installation or alteration of BMPs. At these times, the field foremen or the Stormwater Program Manager or the designee may choose to implement other BMP designs at their project sites to maintain compliance.

- **Non-Industrial Waste Sources:**
  - See Waste Management Plan for details.

## 8. SITE MAP

There are three (3) site maps included in Attachment 1, including the Surrounding Waters Map, Initial Construction Map, and the Interim Reclamation Map.

## 9. STRUCTURAL AND NON-STRUCTURAL BEST MANAGEMENT PRACTICES

The BMPs for sediment and erosion control will be accomplished through a combination of construction techniques, vegetation and re-vegetation, administrative controls, and structural controls.

During periods of active construction, field activities may dictate the installation or alteration of BMP designs between scheduled inspection dates. At these times, the field foremen or the SWMP Administrator(s) or the designee may choose to implement other BMP designs at their project sites to maintain compliance. In these instances, the Site maps are updated during the next inspection to communicate the changes that have taken place since the previous inspection.

The access road will be constructed by clearing and grubbing vegetation, stockpiling topsoil, and surfacing with gravel. Surface roughening and permanent seeding will also be used along the access road as stormwater controls.

BMPs
A combination of silt fence, construction diversion ditches, sediment traps, and berms will be implemented around the perimeter of the site in downsloping areas prior to commencing earth disturbing activities. The silt fence will be the primary control measure installed until the pad is constructed and the associated ditch and basins can be completed.
Diversion ditches will flow from the north, west, and south sides of the pad into a sediment trap on the southwest side of the pad. Due to the anticipated capture and flow of the diversion ditch on the east side, a sediment trap is unnecessary on the southeast corner. Diversion ditches will maintain positive drainage to the sediment trap to inhibit pooling within the ditch.
Silt fence will be implemented around the perimeter of the site prior to earth disturbing activities taking place. The SCLs will be the primary control measure installed until the pad is constructed and



the associated diversion ditches can be completed.

Sculpted slopes and berms will have seed and mulch, typically a tackifier, applied to provide resistance to erosion. Additionally, any area that is at final grade or not worked during 14 consecutive days will receive temporary stabilization methods, such as the tackifier application.

## 10. TEMPORARY AND LONG-TERM STORMWATER MANAGEMENT

### 10.1. TEMPORARY STABILIZATION

Temporary stabilization measures will be implemented for earth disturbing activities on any portion of a site where ground disturbing construction activity has permanently ceased, or temporarily ceased for more than 14 calendar days. Methods for temporary stabilization may include, but are not limited to, tarps, soil tackifier, and/or the application of hydro-seed. The 14-day schedule may be exceeded when either the function of the specific area of the site requires it to remain disturbed or physical characteristics of the terrain and climate prevent stabilization measure application.

Delays in the implementation of temporary stabilization measures will be recorded on the site-specific information as part of the inspection records. In situations where the delay of temporary stabilization measures occurs, an alternative stabilization schedule will be provided, including indication of the location(s) where the alternative schedule is applicable on the site map. The minimum inspection schedule will be followed in temporarily stabilized areas.

### 10.2. LONG-TERM STORMWATER MANAGEMENT

A Post-Construction Stormwater Program will be incorporated into the Wavetech construction program, following the guidelines set forth in COGCC Rule 1002.f.(3), except that such requirements are not applicable to Tier 1 oil and gas locations. Tier 1 oil and gas locations are defined as:

- An oil and gas location where the slopes are less than five percent (5%);
- The soil has low erosion potential;
- Vegetative cover or permanent erosion resistance cover is greater than seventy-five percent (75%);
- The distance from a perennial stream or Classified Water Supply Segment is greater than five hundred (500) feet; and
- The oil and gas location size is less than one (1) acre, measured by the amount of surface disturbance at the time of the termination of a construction stormwater permit issued by the CDPHE.

Devices that will be installed as a long-term stormwater management control include, but are not limited to, the following: seeding/mulch application, diversion ditches along the northwest and southwest sides. When long-term management items are left in place, a note will be included on the final inspection report identifying this plan. Post-construction inspections are conducted annually unless more frequent inspections are deemed necessary. Actions that can lead to more frequent inspections include repeated maintenance of post-construction related BMPs, observed stormwater erosional characteristics occurring during post-construction phase, or other unforeseen stormwater issues that come into play.

During restoration and reclamation work, required repairs to vegetation and erosion and sediment BMPs will be completed as required.

## 11. INSPECTION AND MAINTENANCE

Site inspections will be conducted as follows:

- The first site inspection must be completed within seven (7) calendar days of the commencement of construction activities.
- Active construction sites will be inspected at one of the two following frequencies:
  - o At least one inspection every 7 calendar days; or
  - o At least one inspection every 14 calendar days, if post-storm event inspections are conducted within 24 hours after the end of any precipitation or snowmelt event that causes surface erosion. Note that post-storm inspections may be used to fulfill the 14 day routine inspection requirement.
  - o Wavetech has elected to inspect at least once every 7 days at the UPRC #1 EIGER 14-11 facility during active construction.
- If a site is considered temporarily idle, that is, no construction activities will occur following a storm event, then a post-storm inspection will be conducted prior to re-commencing constructing activities, no later than 72 hours following the storm event. Routine inspections must still be conducted at least every 14 calendar days.
- For sites or portions of sites in which all construction activities that will result in ground disturbance are completed, all activities for final stabilization, as outlined above in Section 10.2, with the exception of vegetative coverage, are completed, and this SWMP has been amended to locate the areas to be inspected, inspections will be conducted at least once every 30 days, and post-storm inspections are not required.
- Inspections are not required at sites where snow cover exists over the entire site for an extended period of time and construction activities are halted, as long as melting conditions do not exist. The following information must be documented in the inspection record for the use of this exclusion: dates when snow cover occurred, date when construction activities ceased, and date melting conditions began. This only applies when all construction activities cease and typically only at high elevations.
- For sites that discharge to a water body designated as an Outstanding Water by the Water Quality Control Division, inspections will be performed at least once every 7 calendar days.

A person identified as a SWMP Manager in the following table will conduct inspections:

SWMP MANAGER TABLE			
Name	Title	Phone	Email
Kevin Teiken	Consultant (Aquionix, Inc.)	970-306-1959	<a href="mailto:kteiken@aquionix.com">kteiken@aquionix.com</a>
Brandon Tabor	Consultant (Aquionix, Inc.)	772-332-1635	<a href="mailto:btabor@aquionix.com">btabor@aquionix.com</a>
Keelan Roalson	Consultant (Aquionix, Inc.)	303-520-9264	<a href="mailto:kroalson@aquionix.com">kroalson@aquionix.com</a>
Igor Gendelman	Vice President (Wavetech Helium, Inc.)	303-534-3383	<a href="mailto:igendelman@wavetechenergy.com">igendelman@wavetechenergy.com</a>
Patrick Jobe	Commercial Manager (Wavetech Helium, Inc.)	303-285-9158	<a href="mailto:pjobe@wavetechenergy.com">pjobe@wavetechenergy.com</a>

The scope of the inspection will cover the construction site perimeter, disturbed areas, designated haul routes, material and/or waste storage areas that are exposed to precipitation, discharge locations, and locations where vehicles access the site. These areas will be inspected for evidence of, or the potential for, pollutants leaving the construction site boundaries entering the stormwater drainage system or discharging to waters of the state. Erosion and sediment control practices identified in this SWMP will be evaluated to ensure that they are maintained and operating correctly.

A sample Routine Stormwater Inspection Form is provided in Attachment 2.

## 12. REPORTS AND RECORD KEEPING

Recordkeeping procedures have been identified to provide accurate and complete documentation of events associated with the stormwater management program. Routine inspections will include the 14-day inspections. All stormwater related records will be filed and stored by Wavetech for a minimum of three years after each individual site has achieved final stabilization. Copies of this SWMP will be maintained and be readily available upon request.

## 13. EMPLOYEE TRAINING

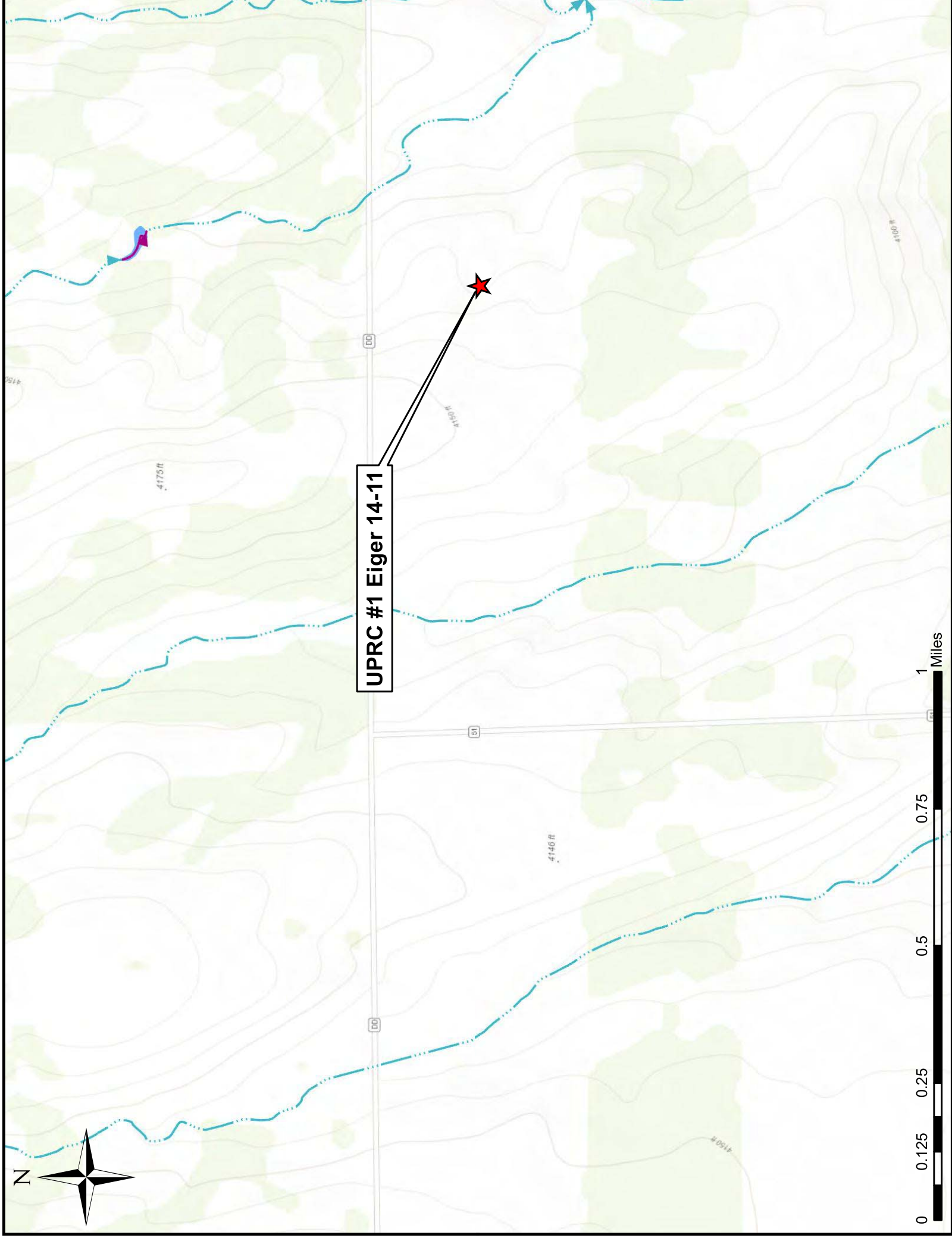
The Qualified Stormwater Managers are trained to understand the following as related to the scope of their job duties:

- The permit deadlines associated with installation, maintenance, and removal of storm water controls and with stabilization.
- The location of all storm water controls on the site required by the permit and how they are to be maintained.
- The proper procedures to follow with respect to the permit's pollution prevention requirements.
- When and how to conduct inspections, record applicable findings, and make corrective action recommendations.

**ATTACHMENT 1**

**SITE MAPS**

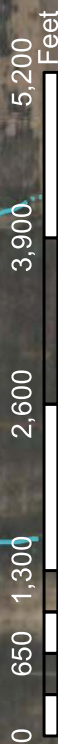
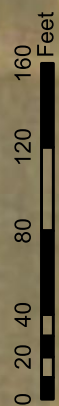
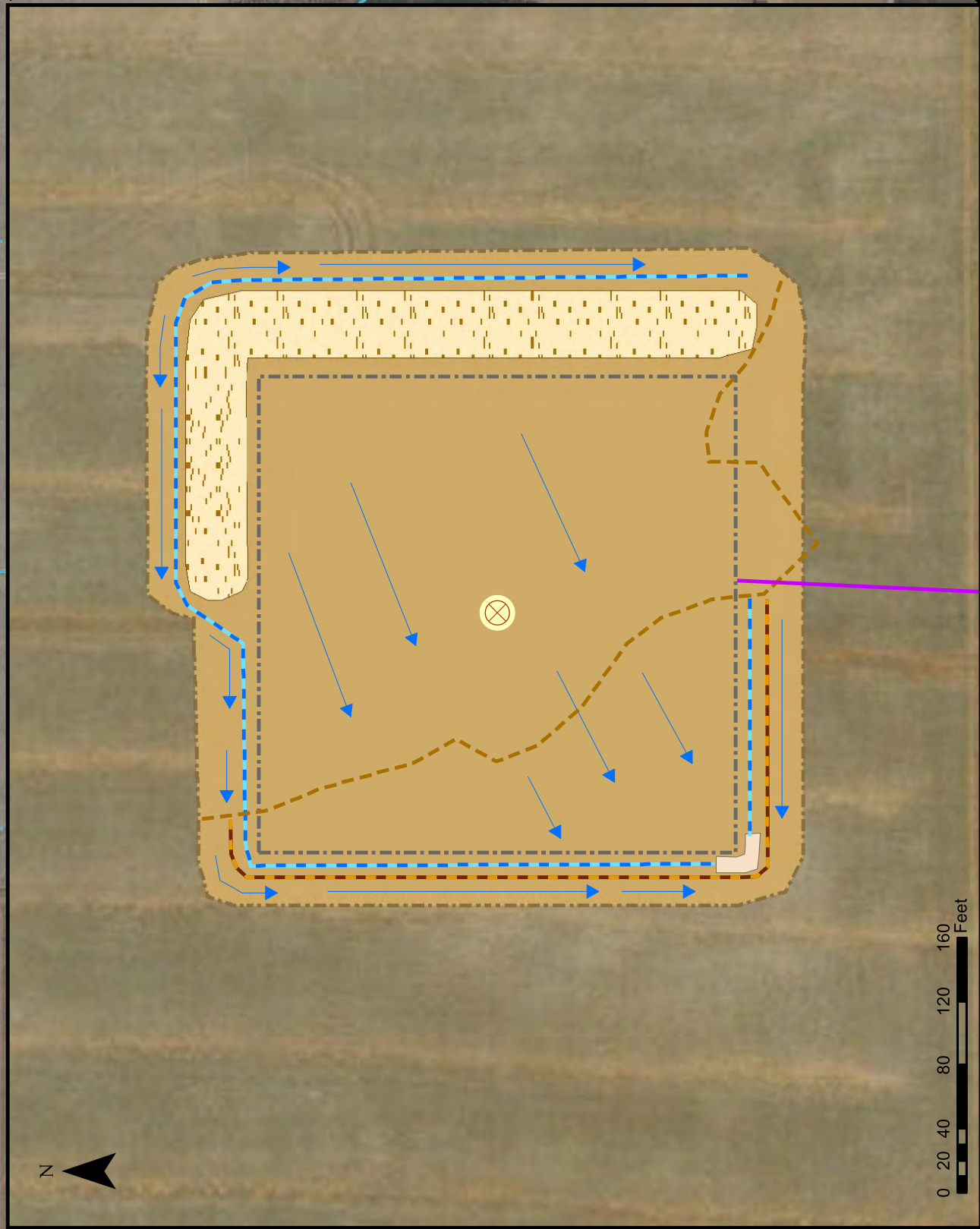
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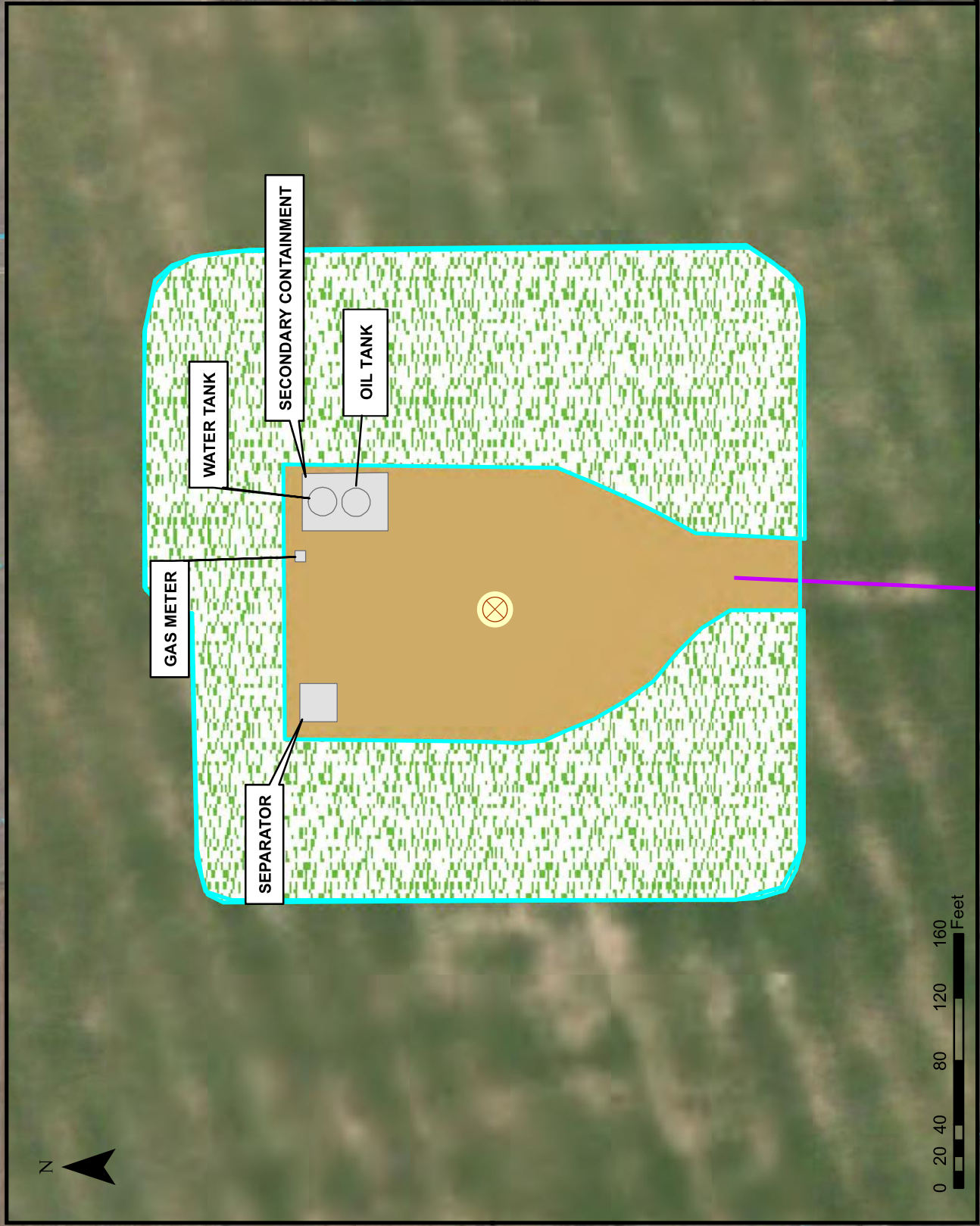


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**ATTACHMENT 2**

**ROUTINE STORMWATER INSPECTION FORM**

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**UPRC 1 EIGER 14-11**  
**Routine Stormwater Inspection Form**

FACILITY INFORMATION		
Facility Name:		
Date (MM/DD/YYYY):		
Inspector Name/Title:		
Weather:		
Inspection Frequency:	<input type="checkbox"/> 14-Day Inspection <input type="checkbox"/> Post-Storm Inspection <input type="checkbox"/> 7-Day Inspection <input type="checkbox"/> Monthly Inspection	
Construction Phase:		
Acreage of Disturbance		
GENERAL QUESTIONS	YES / NO / NA	COMMENTS
Are there any location(s) of discharges of sediment or other pollutants from the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Are there any control measures that need to be maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Are there any control measures that failed to operate as designed or proved inadequate for a particular location?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Are any control measures needed that were not in place at the time of inspection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
Are there any deviations from the minimum inspection schedule?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
CORRECTIVE ACTION LOG		
<b>Description of Corrective Action and Preventative Measure Taken</b> (If infeasible to install or repair control measure immediately, document (1) why it is infeasible and (2) provide a schedule to installation or repair of the control measure.	<b>Date Completed and Initials</b>	
CERTIFICATION AND SIGNATURE		

**UPRC 1 EIGER 14-11**  
**Routine Stormwater Inspection Form**

Pursuant to Part I.A.3.f.i of the general permit, the following signature certifies that after adequate corrective action(s) has been taken or where an inspection does not identify any incidents requiring corrective action, *“I verify that, to the best of my knowledge and belief, all corrective action and maintenance items identified during the inspection are complete, and the site is currently in compliance with the permit”*.

Name /Title	Date