

Dust Mitigation Plan – 304.c.(5)

Federal RGU 44-1-298 Oil and Gas Location

Loc ID #335640

December 2022



INTRODUCTION

TEP Rocky Mountain LLC (“TEP”) has developed the following Dust Mitigation Plan, which describes the methods TEP may use to minimize and / or mitigate fugitive dust generated from the development of proposed wells on Federal RGU 44-1-298 pad. Fugitive dust is typically created during construction activities and from vehicular traffic on dirt or gravel roads. Additionally, fugitive dust can be propagated from the well pad and gravel roads during high wind events. Application of dust control measures, as described below, minimizes the potential for adverse impacts from fugitive dust generated during development. This dust mitigation plan is being submitted as required by COGCC Rule 304.c.(5) and based on the requirements outlined in COGCC Rule 427.

WELL SITE LOCATION AND ACCESS

The existing Federal RGU 44-1-298 pad is one (1) of two (2) Oil and Gas Locations included in the Ryan Gulch Phase 3 Oil and Gas Development Plan (“OGDP”). Development of the Federal RGU 44-1-298 pad involves the reconstruction and expansion of the existing pad, construction of a new pipeline corridor for natural gas and produced water transportation, and utilization of other existing facilities (i.e. RGU 23-7-297 pad) to support well completion and production operations.

The existing Federal RGU 44-1-298 pad is located in Lot 35 and Lot 36 of Section 1, Township 2 South, Range 98 West, 6th P.M., within Rio Blanco County, Colorado, on Federal surface administered by the Bureau of Land Management (“BLM”). The pad will be accessed via State, local, and lease roads. Beginning at the intersection of Rio Blanco County Road 5 and County Road 24, proceed west along County Road 24 approximately 2.84 miles to the intersection with a dirt/gravel road, proceed right in a northerly direction approximately 0.07 miles to the Federal RGU 44-1-298 Oil and Gas Location.

Rio Blanco County Road 24 is an improved paved road maintained by Rio Blanco County Road and Bridge. The existing dirt/gravel road from Rio Blanco County Road 24 is maintained by the TEP. Please see the Access Road Map attached to the Form 2A for a depiction of the existing access route. The existing access road is currently utilized for access to the adjacent pipeline corridor.

The existing Federal RGU 44-1-298 pad will be reconstructed to a 5.63-acre footprint to support development of the eighteen (18) proposed natural gas wells. The pad will have a constructed elevation of 6,277.5 feet. The long-term disturbance of the Federal RGU 44-1-298 pad following interim reclamation will be 1.65-acres.

DUST MITIGATION

TEP will employ several methods to minimize and / or mitigate fugitive dust during construction, drilling, completion, and production operations associated with development of the proposed wells on the Federal RGU 44-1-298 pad.

TEP has notified Rio Blanco County of the proposed development plan for the Federal RGU 44-1-298 pad and will continue to coordinate with Rio Blanco County regarding planned operations and seasonal maintenance activities along county roads.

The existing access road from County Road 24 to the Federal RGU 44-1-298 pad will be maintained by TEP in a manner that minimizes fugitive dust during all phases of development. The following describes the existing surface conditions, the anticipated usage of the existing road, and the mitigation measures proposed to minimize and / or mitigate fugitive dust.

1. Soil Types: Soils in the project area are described in *Table 1, Soil Types within Project Area*. Please see the Natural Resources Conservation Service (“NRCS”) Map Unit Description for each of the soil types listed below for more details on the soil within the project area.

Table 1, Soil Types within Project Area

Map Unit	Soil Series	Additional Information	Project Components
6	Barcus channery loamy sand, 2 to 8 percent slopes	Alluvial fans, valleys; Calcareous alluvium derived from sandstone and shale	Existing RGU 44-1-298 Pad Proposed Gas & Water Pipeline Corridor Existing / Proposed Access Road
36	Glendive fine sandy loam	Drainageways, valley floors; Alluvium	Proposed Water Pipeline Corridor
91	Torriorthents-Rock outcrop complex, 15 to 90 percent slopes	Ridges, canyons, mountains, hills; Colluvium derived from siltstone and/or residuum weathered from limestone, sandstone, and shale	Proposed Gas & Water Pipeline Corridor

2. Speed Limits: The speed limit for the existing access road to the Federal RGU 44-1-298 pad is fifteen (15) miles per hour. TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions.
3. Total Soil Disturbance: The total project disturbance of the Federal RGU 44-1-298 pad and associated facilities is approximately 9.47 acres. Please see the Plan of Development attached to the Form 2A for a detailed breakdown of the project disturbance by project component.
4. Paved Access: The existing access to the Federal RGU 44-1-298 pad is not and will not be paved.
5. Anticipated Truck Trips: During each phase of development, TEP or contractors will utilize semi-trucks to haul heavy equipment to the location and will utilize heavy duty pickup trucks to transport personnel and other lightweight materials to the Oil and Gas Location. Please see *Table 2, Anticipated Truck Trips*, for a breakdown of the anticipated truck trips.

Table 2, Anticipated Truck Trips

Development Phase	Number of Semi-Trucks	Number of Pickup Trucks	Total Truck Trips
Construction	164	240	404
Drilling	972	3,660	4,632
Completion	473	2,665	3,138
Interim Reclaim	17	60	77
Production ¹	116	350	466
Total	1,742	6,975	8,717

¹Production truck trips are based on a one-year estimate. Truck trips will decrease over the life of the wells based on well performance.

6. Fugitive Dust Suppression During Windy Conditions: During dry and windy weather conditions the following dust suppression methods will be utilized:
 - a. During wind events in excess of 13 miles per hour, TEP construction contractors will apply fresh water from an approved fresh water source to the disturbance area of the pad, road, or pipeline corridor to minimize or mitigate propagation of fugitive dust. Accessibility and worker safety will be considered prior to application.

- b. During periods of sustained high winds over 20 miles per hour, TEP construction contractors may temporarily suspend work to minimize potential for migration of fugitive dust, ensure worker safety, and to minimize impacts to public health, safety, welfare, the environment, and wildlife.
7. Best Management Practices: The following Best Management Practices will be utilized during development of the Federal RGU 44-1-298 Oil and Gas Location to minimize or mitigate fugitive dust:
- a. Pad / Road Construction: Fresh water will be periodically applied to disturbance areas during construction to minimize fugitive dust;
 - b. TEP will not use produced water or other process fluids for dust suppression;
 - c. During High Wind: Contractor will monitor wind conditions during site construction; during wind events in excess of 13 miles per hour, TEP construction contractors will apply freshwater from an approved source to the disturbance area of the pad, road, or pipeline corridor to minimize or mitigate propagation of fugitive dust; accessibility and worker safety will be considered prior to application; during periods of sustained high winds over 20 miles per hour, TEP construction contractors may temporarily suspend work to minimize potential for migration of fugitive dust, ensure worker safety, and to minimize impacts to public health, safety, welfare, the environment, and wildlife;
 - d. Road Surfacing: The existing lease road will be graveled during site construction to ensure there is sufficient gravel on the road to minimize fugitive dust;
 - e. Speed Restrictions: TEP has implemented speed restrictions on all lease roads and requires all TEP employees and contractors to adhere to all posted speed restrictions;
 - f. Road Maintenance: During long-term production operations, TEP will conduct annual inspections of the existing road and will perform maintenance actions as necessary to ensure road integrity and minimize fugitive dust. Road maintenance actions may include, but not limited to, regrading, spot graveling, storm water control maintenance, and application of magnesium chloride ($MgCl_2$) and / or fresh water;
 - g. Site Visitation: TEP will utilize telemetry equipment to minimize well site visitation, when possible, to reduce fugitive dust from vehicles traveling the dirt / gravel roads;
 - h. When / if sand / proppant is used during completion operations, an enclosed sand storage and delivery system will be utilized to eliminate possible fugitive sand dust emissions; and
 - i. Topsoil and stockpiled soils will be stabilized through either tackifiers, seeding practices, or erosion control blankets.