

FORM  
2A

Rev  
05/22

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403335243

(SUBMITTED)

Date Received:

04/25/2023

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

OGDP ID:

Expiration Date:

☒ New Location ☐ Refile ☐ Amend Existing Location # \_\_\_\_\_

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
230400132		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

<No existing OGDP number provided>

CONSULTATION

- ☒ This location is included in a Comprehensive Area Plan (CAP). CAP ID # 211200237
- ☒ This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
- ☐ This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
- ☐ This Location includes a Rule 309.e.(2).E variance request.
- ☐ This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 47120

Name: KERR MCGEE OIL & GAS ONSHORE LP

Address: P O BOX 173779

City: DENVER State: CO Zip: 80217-3779

Contact Information

Name: JOHN PIEKARA

Phone: (720) 929-3094

Fax: ( )

email: JOHN\_PIEKARA@OXY.COM

FINANCIAL ASSURANCE FOR THIS LOCATION (check all that apply)

- ☒ Plugging, Abandonment, and Reclamation 20010124
- ☐ Centralized E&P Waste Management Facility \_\_\_\_\_
- ☐ Gas Gathering, Gas Processing, and Underground Gas Storage Facilities \_\_\_\_\_
- ☐ Surface Owner Protection Bond. \_\_\_\_\_

Federal Financial Assurance

- ☐ In checking this box, the Operator certifies that it has provided or will provide at least this amount of Financial Assurance to the federal government for one or more Wells on this Location.

Amount of Federal Financial Assurance \$ \_\_\_\_\_

LOCATION IDENTIFICATION

Name: ROAN ANGEL Number: 5-23HZ

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

Quarter: SWNW Section: 23 Township: 3N Range: 63W Meridian: 6 Ground Elevation: 4739  
Latitude: 40.214248 Longitude: -104.412321  
GPS Quality Value: 1.5 Type of GPS Quality Value: PDOP Date of Measurement: 02/14/2023

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Production Facilities Location serves Well(s)	<u></u>	<u>403335132</u>
Production Facilities Location serves Well(s)	<u></u>	<u>403335162</u>

## RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: Yes

Date Relevant Local Government permit application submitted: 02/14/2023

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Approved

Status/disposition date: 04/27/2023

If Relevant Local Government permit has been approved or denied, attach final decision document(s).

Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970-400-3580

Contact Email: jmaxey@weldgov.com

## PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

## FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).

Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name:  Contact Phone:

Contact Email:  Field Office:

Additional explanation of local and/or federal process:

A Comprehensive Development Plan (CDP) was filed with Weld County Oil and Gas Energy Department on February 14, 2023 and approved on April 27, 2023. The CDP's WOGLA number is: 1041WOGLA22-0044. Site specific 1041WOGLA23-0032 for this location has been submitted. CDP final order attached as "other".

## RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? Yes

Date of local government consultation: 07/20/2022

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation: \_\_\_\_\_

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. Yes

## ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- |   |  |
|---|--|
| <input type="checkbox"/> i. WPS < 2,000 feet from RBU/HOBU  | <input type="checkbox"/> vi.aa. WPS within a surface water supply area                       |
| <input type="checkbox"/> ii. WPS < 2,000 feet from School/Child Care Center                             | <input type="checkbox"/> vi.bb. WPS < 2,640 feet from Type III or GUDI well                  |
| <input type="checkbox"/> iii. WPS < 1,500 feet from DOAA  | <input type="checkbox"/> vii. WPS within/immediately upgradient of wetland/riparian corridor |
| <input type="checkbox"/> iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA | <input checked="" type="checkbox"/> viii. WPS within HPH and CPW did not waive               |
| <input type="checkbox"/> v. WPS within a Floodplain   | <input type="checkbox"/> ix. Operator using Surface bond                                     |
|   | <input type="checkbox"/> x. WPS < 2,000 feet from RBU/HOBU/School within a DIC               |

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: ☐

Provide an explanation for the waiver request, and attach supporting information (if necessary).

## ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
	40.212949	-104.449716												ROAN ANGEL 5-23HZ Alternate Location 1 - Two locations needed to develop same mineral acreage. Further from existing central road and utility corridor. No ALA triggers.
	40.214752	-104.359631								x				ROAN ANGEL 5-23HZ Alternate Location 2 - Within pronghorn and mule deer HPH. Two locations needed to develop same mineral acreage. Further from existing central road and utility corridor.

## SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Cervi Enterprises, Inc.

Phone: 970-356-6000

Address: PO BOX 1930

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Email: jacque@producersfl.com

City: Greeley State: CO Zip: 80632

Surface Owner at this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check only one:

☐ The Operator/Applicant is the surface owner.

☒ The Operator has a signed Surface Use Agreement for this Location – attach SUA.

☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A

Surety ID Number: \_\_\_\_\_

Mineral Owner beneath this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

Lease description if necessary: \_\_\_\_\_

## SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	<u>14</u>	Oil Tanks	<u>0</u>	Condensate Tanks	<u>0</u>	Water Tanks	<u>0</u>	Buried Produced Water Vaults	<u>0</u>
Drilling Pits	<u>0</u>	Production Pits	<u>0</u>	Special Purpose Pits	<u>0</u>	Multi-Well Pits	<u>0</u>	Modular Large Volume Tank	<u>1</u>
Pump Jacks	<u>14</u>	Separators	<u>7</u>	Injection Pumps	<u>0</u>	Heater-Treaters	<u>0</u>	Gas Compressors	<u>0</u>
Gas or Diesel Motors	<u>0</u>	Electric Motors	<u>0</u>	Electric Generators	<u>0</u>	Fuel Tanks	<u>0</u>	LACT Unit	<u>2</u>

Dehydrator Units 0 Vapor Recovery Unit 4 VOC Combustor 0 Flare 0 Enclosed Combustion Devices 0  
 Meter/Sales Building 2 Pigging Station 4 Vapor Recovery Towers 0

## OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
gas lift meter	14
scrubber (inlet and discharge)	2
electrical box (panels/transformer)	4
slug catchers	3
line heater	2
fuel gas scrubber	1
E house	1
air compressor	2
chemical totes	4

## OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
propane tank	2
temp sand tank	2
purge flare	3
ECD	2
sand traps	3

## GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

## FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Flowlines - 3" size (outside diameter), constructed of carbon steel. Oil, gas and water pipelines will be used at this location. Water for completions operations will be brought to the location through temporary water lines using KMOG's Water on Demand system. See comments for further description.

## CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply):			Details of Condition(s)	604.b. (4)
				604.b. (1)	604.b. (2)	604.b. (3)		
Building:	5230	Feet	SE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Residential Building Unit (RBU):	5280	Feet	SE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
High Occupancy Building Unit(HOBU)	5280	Feet	SE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	5280	Feet	S					
Above Ground Utility:	77	Feet	W					
Railroad:	5280	Feet	S					
Property Line:	58	Feet	W					
School Facility:	5280	Feet	SW					

Child Care Center: 5280 Feet SW  
Disproportionately Impacted (DI) Community: 5280 Feet NW  
RBU, HOBUE, or School Facility within a DI Community: 5280 Feet NW ☐ ☐ ☐

## RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

## CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	0	0
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

## CONSTRUCTION

Size of disturbed area during construction in acres: 16.60  
Size of location after interim reclamation in acres: 7.98  
Estimated post-construction ground elevation: 4741

## DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes  
Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.  
Will salt sections be encountered during drilling: No  
Will salt based (>15,000 ppm Cl) drilling fluids be used? No  
Will oil based drilling fluids be used? Yes

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Centralized E&P WMF  
Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal  
Other Disposal Description:

PLEASE SEE ATTACHED MANAGEMENT PLAN

Beneficial reuse or land application plan submitted? Yes  
Reuse Facility ID: or Document Number:  
Centralized E&P Waste Management Facility ID, if applicable: 456644

## CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)  
Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other  
Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

Rangeland

Describe the Relevant Local Government's land use or zoning designation:

AG

Describe any applicable Federal land use designation:

N/A

## FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)  
Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other  
Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

## REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

Rangeland

Reference Area Latitude: 40.216062

Reference Area Latitude: -104.413060

Provide a list of plant communities and dominant vegetation found in the Reference Area.

Plant Community	Dominant vegetation
Disturbed Grassland	Western wheatgrass (Pascopyrum smithii)
Disturbed Grassland	Fringed sagebrush (Artemisia frigida)
Disturbed Grassland	Blue grama (Bouteloua gracilis)
Disturbed Grassland	Needle-and-thread grass (Hesperostipa comata)
Disturbed Grassland	Common sunflower (Helianthus annuus)
Disturbed Grassland	Smooth brome (Bromus inermis)
Disturbed Grassland	Squirreltail (Elymus elymoides)

Noxious weeds present: No

## SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at <https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/> or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 71 - Valent-Loup complex, 0 to 9 percent slopes

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

## GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 2791 Feet SW

Spring or Seep: 5280 Feet N

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 9 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

A groundwater monitoring well was installed to 12' at this proposed location. Groundwater was detected at 9'-4".

## SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 560 Feet SE

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working

Pad Surface: 726 Feet SE

Provide a description of the nearest downgradient surface Waters of the State:

National Hydrography Dataset (NHD) drainage

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name \_\_\_\_\_ Email \_\_\_\_\_

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name \_\_\_\_\_ Email \_\_\_\_\_

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

\_\_\_\_\_

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

☒ Federal (FEMA) ☐ State ☒ County ☐ Local

☐ Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

## CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- ☒ This location is included in a Wildlife Mitigation Plan
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- ☒ A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred 03/29/2023 on:

### CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- ☐ The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- ☐ The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- ☐ The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- ☐ The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- ☐ The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- ☐ The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- ☐ The applicant has obtained a Rule 1202.a CPW waiver.
- ☐ The applicant has obtained a Rule 1202.b CPW waiver.
- ☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation Rule(s): \_\_\_\_\_

## HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

High Priority Habitat (list all that apply)	Oil and Gas Location	Access Road	Utility or Pipeline Corridor
1202.d.(4) - Pronghorn migration & winter	x	x	x
1202.d.(3) - Mule deer migration & winter	x	x	x

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

**Direct Impacts:**Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? YesIs a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? NoHave all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

NAIs a Compensatory Mitigation Fee proposed for this Oil and Gas Location? YesDirect impact habitat mitigation fee amount: \$ 49913.55**Indirect Impacts:**Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? YesIs a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? NoHave all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

NAIs a Compensatory Mitigation Fee proposed for this Oil and Gas Location? YesIndirect impact habitat mitigation fee amount: \$ 83070.31**Operator Proposed Wildlife BMPs**

No BMP

**AIR QUALITY MONITORING PROGRAM**Will the Operator install and administer an air quality monitoring program at this Location? Yes**Operator Proposed BMPs**

No	BMP Target	CDPHE Recommendation	COGCC Action
	Water		
	Description	Down gradient controls: Operator will install adequate down gradient controls if they can not have a control at the source	
	CDPHE Comment		
	Air		
	Description	Oil, water, and gas will be routed through permanent facility equipment during flowback, with the exception of temporary sand handling equipment that is necessary to prevent damage to the permanent facility. Emissions associated with the sand will be managed with a temporary ECD.	
	CDPHE Comment		
	Water		
	Description	CPGCC permit will incorporate other agency water quality protection plans by reference as applicable (e.g. stormwater management plan)	
	CDPHE Comment		
	Water		
	Description	Vehicle fueling: Operator will refuel vehicles only on impervious surfaces and never during storm events	

	CDPHE Comment	
	PFAS	
	Description	If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water - Commit, if used by a third party to address a KMOG issue.
	CDPHE Comment	
	Water	
	Description	Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations
	CDPHE Comment	
	Air	
	Description	Engines: Operator will use tier IV or better engines for drilling - Commit to natural gas generators with battery for the drilling rig
	CDPHE Comment	
	Air	
	Description	Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic
	CDPHE Comment	
	Air	
	Description	Odor mitigation: operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore
	CDPHE Comment	
	Air	
	Description	Operator will properly maintain vehicles and equipment
	CDPHE Comment	
	PFAS	
	Description	If PFAS-containing foam is used at a location: operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions - Commit, if used by a third party to address a KMOG issue.
	CDPHE Comment	
	Water	
	Description	Vehicle fueling: Operator will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections
	CDPHE Comment	
	Air	
	Description	Electrification: Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)
	CDPHE Comment	
	Air	
	Description	Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents
	CDPHE Comment	
	Air	
	Description	Operator will use vapor recovery units (VRUs) to capture and route storage vessel gas to pipeline
	CDPHE Comment	
	Water	

	Description	Outfall locations: Outlet protection should be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow. Outlet protection should be provided where the velocity at the culvert outlet exceeds the maximum permissible velocity of the material in the receiving channel.
	CDPHE Comment	
	Air	
	Description	Odor mitigation: Operator will ensure that all drilling fluid is removed from pipes before storage
	CDPHE Comment	
	Waste	
	Description	Operator will properly test for and dispose of TENORM
	CDPHE Comment	
	Air	
	Description	Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling
	CDPHE Comment	
	PFAS	
	Description	If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and extent of contamination - Commit, if used by a third party to address a KMOG issue.
	CDPHE Comment	
	Water	
	Description	Stream crossing and Road Construction: Operator will ensure that control measures are designed, installed and adequately sized in accordance with good engineering, hydrologic and pollution control practices
	CDPHE Comment	
	Air	
	Description	Operator will implement ambient air quality monitoring on site - KMOG commits to monitoring during drilling and completion operations and for the first 6 months of production in accordance with Reg. 7.
	CDPHE Comment	
	PFAS	
	Description	Operator will coordinate with nearby fire district(s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard - Fire Districts are a part of Colorado Preparedness and Response Network so they have been involved in the PFAS evaluations
	CDPHE Comment	
	Air	
	Description	Operator will use non-emitting pneumatic controllers
	CDPHE Comment	
	Water	
	Description	Stormwater inspections: Operator will conduct stormwater inspections immediately after storm event
	CDPHE Comment	
	Water	
	Description	Documentation / stormwater management plan: If it is infeasible to install or repair a control measure immediately after discovering a deficiency, operator will document and keep on record in the stormwater management plan: (a) a description of why it is infeasible to initiate the installation or repair immediately; and (b) a schedule for installing or repairing the control measure and returning it to an effective operating condition as soon as possible.

CDPHE Comment	
Air	
Description	Odor mitigation: operator will use zero VOC (group III, low/negligible odor) drilling mud
CDPHE Comment	
Water	
Description	Dust suppression: Operator will not use produced water or other process fluids for dust suppression
CDPHE Comment	
Air	
Description	Operator will use lease automated custody transfer (LACT) system to remove/reduce the need for truck loadout
CDPHE Comment	
Air	
Description	Odor mitigation: operator will cover trucks transporting drill cuttings
CDPHE Comment	
Waste	
Description	Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream)
CDPHE Comment	
Water	
Description	Operator will use Modular Large Volume Storage Tanks - KMOG is planning an MLVT on three Oil and Gas locations in the Colt OGDG to utilize as necessary
CDPHE Comment	
Water	
Description	Secondary containment: Operator will install perimeter controls to control potential sediment-laden runoff in the event of spill or release from Modular Large Volume Storage Tank
CDPHE Comment	

## PLANS

Total Plans                      15  
 Uploaded:

- ☐ (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- ☒ (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- ☒ (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- ☒ (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- ☒ (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- ☒ (6) Transportation Plan
- ☒ (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- ☒ (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- ☐ (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- ☐ (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- ☒ (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- ☐ (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- ☒ (13) Fluid Leak Detection Plan

- ☒ (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- ☒ (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- ☒ (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- ☒ (17) Wildlife Plan consistent with the requirements of Rule 1201
- ☒ (18) Water Plan
- ☒ (19) Cumulative Impacts Plan
- ☐ (20) Community Outreach Plan
- ☐ (21) Geologic Hazard Plan

## VARIANCE REQUESTS

Check all that apply:

- ☐ This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission

Order number: \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- |  |  |
|--|--|
| <input type="checkbox"/> 304.b.(1). Local Government Siting Information      | <input type="checkbox"/> 304.c.(1). Emergency Spill Response Program           |
| <input type="checkbox"/> 304.b.(2). Alternative Location Analysis            | <input type="checkbox"/> 304.c.(2). Noise Mitigation Plan                      |
| <input type="checkbox"/> 304.b.(3). Cultural Distances                       | <input type="checkbox"/> 304.c.(3). Light Mitigation Plan                      |
| <input type="checkbox"/> 304.b.(4). Location Pictures                        | <input type="checkbox"/> 304.c.(4). Odor Mitigation Plan                       |
| <input type="checkbox"/> 304.b.(5). Site Equipment List                      | <input type="checkbox"/> 304.c.(5). Dust Mitigation Plan                       |
| <input type="checkbox"/> 304.b.(6). Flowline Descriptions                    | <input type="checkbox"/> 304.c.(6). Transportation Plan                        |
| <input type="checkbox"/> 304.b.(7). Drawings                                 | <input type="checkbox"/> 304.c.(7). Operations Safety Management Program       |
| <input type="checkbox"/> 304.b.(8). Geographic Information System (GIS) Data | <input type="checkbox"/> 304.c.(8). Emergency Response Plan                    |
| <input type="checkbox"/> 304.b.(9). Land Use Description                     | <input type="checkbox"/> 304.c.(9). Flood Shut-In Plan                         |
| <input type="checkbox"/> 304.b.(10). NRCS Map Unit Description               | <input type="checkbox"/> 304.c.(10). Hydrogen Sulfide Drilling Operations Plan |
| <input type="checkbox"/> 304.b.(11). Best Management Practices               | <input type="checkbox"/> 304.c.(11). Waste Management Plan                     |
| <input type="checkbox"/> 304.b.(12). Surface Owner Information               | <input type="checkbox"/> 304.c.(12). Gas Capture Plan                          |
| <input type="checkbox"/> 304.b.(13). Proximate Local Government              | <input type="checkbox"/> 304.c.(13). Fluid Leak Detection Plan                 |
| <input type="checkbox"/> 304.b.(14). Wetlands                                | <input type="checkbox"/> 304.c.(14). Topsoil Protection Plan                   |
| <input type="checkbox"/> 304.b.(15). Schools and Child Care Centers          | <input type="checkbox"/> 304.c.(15). Stormwater Management Plan                |
|  | <input type="checkbox"/> 304.c.(16). Interim Reclamation Plan                  |
|  | <input type="checkbox"/> 304.c.(17). Wildlife Plan                             |
|  | <input type="checkbox"/> 304.c.(18). Water Plan                                |
|  | <input type="checkbox"/> 304.c.(19). Cumulative Impacts Plan                   |
|  | <input type="checkbox"/> 304.c.(20). Community Outreach Plan                   |
|  | <input type="checkbox"/> 304.c.(21). Geologic Hazard Plan                      |

## OPERATOR COMMENTS AND SUBMITTAL

Comments	<p>KMOG is providing an Alternative Location Analysis addressing Mule Deer SWR in anticipation of 2023 HPH data being approved through rulemaking.</p> <p>Habitat mitigation fees have been determined through consultation with CPW.</p> <p>KMOG's general Air Monitoring Plan has been approved by the CDPHE and is attached to the 2B. A site-specific Air Monitoring Plan for this location will be submitted to the COGCC and CDPHE for approval of air monitor locations prior to operations.</p> <p>Flowlines: Flowlines will flow to the production facility location. During production, flow direction in the flow lines is from the wellhead to the production facility. The size of flow lines is typically 3". Flow lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility. Gas custody transfer will occur at the custody transfer meter located on the proposed production facility location. Oil custody transfer will occur at the LACT Unit located on the proposed related production facility location.</p> <p>Produced water will be routed to an 8" pipeline made of composite material, tie into the central pipeline / utility corridor and transported off ranch to a 3rd party existing SWD or to the Daniel Boone Location (2A ID 403335244) for recycle/reuse operations.</p> <p>Gas lift lines are also occasionally installed (one per well) from the well head to the production facility. During operation flow direction in the gas lift lines will be from the production facility to the well head. The size of the gas lift lines is typically 2". Gas lift lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the tank battery.</p> <p>Air Supply Lines: Compressed air supply lines will also be installed from the well head to the production facility. During operation flow direction in the supply lines will be from the production facility to the well head. The size of the supply lines is typically 1". Supply lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility.</p> <p>A temporary generator may be placed on location if needed and would be in place until electric power is available. Temporary purge flares may be placed on location for up to 60 days. A temporary 500-gallon propane tank will be used on location to provide fuel gas during facility equipment startup.</p> <p>Although not required a community consultation plan has been attached and labeled "other".</p> <p>KMOG is proposing one MLVT up to 25,000 bbl - 36 feet tall and 70 feet diameter. The vendor of the MLVT is Shalestone and will be utilized for completions operations at this Location (approximately three months). This MLVT is &gt;5280' from the nearest RBU and is not immediately upgradient from waters of the state. Please see additional mitigation measures in the BMP section which apply to the MLVT.</p>
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I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: \_\_\_\_\_ Date: 04/25/2023 Email: DJRegulatory@oxy.com

Print Name: John Piekara Title: Regulatory Advisor

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: \_\_\_\_\_ Director of COGCC Date: \_\_\_\_\_

### **Conditions Of Approval**

**All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.**

<u>COA Type</u>	<u>Description</u>
0 COA	

### **Best Management Practices**

No	BMP/COA Type	Description
1	Planning	Access Road: KMOG will utilize an existing access road from Highway 34 for drilling, completion, and production operations, including maintenance equipment. The road will be properly maintained to accommodate for emergency vehicle access. An access permit has been obtained from CDOT.
2	Planning	KMOG commits to plugging and abandoning the wells described in the Cumulative Impacts Plan within one year of all wells associated with this OGDG being fully turned over to production through permanent facility equipment. If unanticipated delays are encountered associated with safety concerns, wildlife stipulations, landowner considerations, offset operations or rig availability KMOG will provide staff with an updated schedule for plugging and abandonment via a Form 4.
3	Planning	KMOG commits to plugging and abandoning the wells listed in the beneficial impacts section of the Colt OGDG Cumulative Impacts Plan within one year of all wells associated with this OGDG being fully turned over to production through permanent facility equipment. If unanticipated delays are encountered associated with safety concerns, wildlife stipulations, landowner considerations, offset operations or rig availability KMOG will provide staff with an updated schedule for plugging and abandonment via a Form 4.
4	Planning	<p>The MLVT will be in compliance with the following COGCC safety setbacks. 1) Seventy-five (75) feet from a wellhead, fired vessel, heater-treater, or a compressor with a rating of 200 horsepower or more; 2) Fifty (50) feet from a separator, well test unit, or other non-fired equipment.</p> <p>Signs shall be posted on each MLVT to indicate that the contents are fresh water and that no E&amp;P waste fluids are allowed. Location and additional signage shall conform to Rule 210.</p> <p>MLVT will be operated with a minimum of 1 foot freeboard at all times.</p> <p>Access to the tanks shall be limited to operational personnel.</p> <p>Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications. KMOG follows manufacturers Standard Operating Procedures (SOPs) and will provide these SOPs upon request to the COGCC.</p> <p>KMOG will conduct daily, visual inspections of the exterior wall and general area for any integrity deficiencies before, during, and after filling the MLVTs. If deficiencies are noted, KMOG will repair them as soon as practicable. Records of repairs will be maintained per Rule 205.</p> <p>KMOG will follow pre-construction risk assessment measures to address safety concerns, and minimize environmental impacts and property damage in the unlikely event of a MLVT release.</p> <p>In the event of a catastrophic MLVT failure, KMOG shall notify the COGCC as soon as practicable but not more than 24 hours after discovery, submit a Form 22- Accident Report within 10 days after discovery, conduct a root cause analysis and provide same to COGCC on a Form 4-Sundry Notice within 30 days of the failure.</p> <p>All MLVT liner seams shall be welded and tested in accordance with applicable ASTM international standards. Any repairs to liners shall be made using acceptable practices and applicable standards.</p> <p>The MLVT shall be constructed and operated in accordance with a design package certified and sealed by a Licensed Professional Engineer either in Colorado or the state where the MLVT was designed or manufactured.</p> <p>KMOG hereby certifies to the Director that the MLVT at this location will be designed and implemented consistent with the COGCC's policy dated June 13, 2014.</p>
5	General Housekeeping	Loadlines: All loadlines shall be bullplugged or capped

6	General Housekeeping	Removal of Surface Trash: A commercial size trash bin for removing debris will be located on site. This bin will be for use by all parties affiliated with the operation. Upon completion of operations, the commercial trash bin will be removed from the location and disposed of in an appropriate manner
7	General Housekeeping	<p>Lighting BMPs</p> <p>Construction Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will only conduct day light operation and there will be no nighttime operations that require lighting.</li> </ul> <p>Drilling Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction where vertical lighting is not required. Where it is required, lights are angled in a vertical direction to provide task lighting for safety and operations involving personnel.</li> <li>• Derrick mast in Section 5.4 is facing horizontally to provide adequate lighting for safe operation.</li> <li>• Lighting is angled away from surrounding off site buildings.</li> <li>• Lighting within the Drilling area has been reduced to provide a minimum acceptable value for safe operation.</li> <li>• Light masts are automatically switched off/on based on lighting sensors.</li> <li>• Lights are switched off when not required.</li> <li>• Low power (63 W) LED lights are used for the drill rig.</li> <li>• In the event of a lightning complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul> <p>Completions and Flowback Phases:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction where vertical lighting is not required. Where it is required, lights are angled in a vertical direction to provide task lighting for safety and operations involving personnel.</li> <li>• Lighting is angled away from surrounding off site buildings.</li> <li>• Lighting within the Completion and Flowback areas have been reduced to provide a minimum acceptable value for safe operation.</li> <li>• Light masts are automatically switched off/on based on lighting sensors.</li> <li>• Lights are switched off when not required.</li> <li>• Lights are directed to task areas only.</li> <li>• In the event of a lightning complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul> <p>Production Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction.</li> <li>• Lighting within the Production areas have been reduced to provide a minimum acceptable value for safe operation.</li> <li>• In the event of a lighting complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul>
8	General Housekeeping	The wells are commingled into a bulk and test facility design. This reduces the total number of separators on location on a per well basis which in turn allows KMOG to have a smaller facility footprint. Reducing the total number of separators per well also reduces the total noise and emissions from the separator burners

9	Storm Water/Erosion Control	Stormwater will be managed during construction by a combination of site-specific erosion and sediment control measures including: delineation of limits of construction to establish a work space; a vehicle tracking control placed near the new access road to the well pad and the facility pad to mitigate off-site sediment migration from vehicle traffic onto Highway 34; a temporary diversion ditch & berm around the entire location to manage run-on and run-off; temporary spillways and outlet structure placed around the disturbance area ditch and berm which will allow for settling of sediment from stormwater prior to discharge; culverts, if necessary, with inlet and outlet protection will be installed to direct stormwater to designated discharge points; seed & mulch to stabilize areas no longer needed for construction, as well as for topsoil stockpiles which will remain in place until interim and final reclamation. During active construction, daily inspections will be completed by on-site personnel. A contractor will conduct stormwater compliance inspections every 14- days and/or following a rain event which produces 0.25" of precipitation or equivalent snow melt which causes surface erosion. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed. Maintenance and repair will be completed as soon as practicable, immediately in most cases.
10	Material Handling and Spill Prevention	Pit Level Indicators: All storage tanks used for active drilling operations (used in lieu of pits) contain pit level monitors with Electronic Drilling Recorders (EDR). KMOG uses EDRs with pit level monitor(s) and alarm(s) for production rigs. Basic level gauges are used on tanks utilized for the surface rig.
11	Material Handling and Spill Prevention	Operator will not use PFAS on location
12	Material Handling and Spill Prevention	Oil pipeline takeaway and produced water gathering will be in place for this location's production. There will be no storage of oil or produced water associated with these wells' production.
13	Material Handling and Spill Prevention	<p>A. Material Handling and Spill Prevention The following site-specific BMPs will be used on location: During non-active, but while under construction, site inspections will occur every 14 days. When construction is completed and the Location is on production, site inspections will occur every 28 days.</p> <p>B. Drilling Operations During drilling operations, the following site-specific BMPs will be used: Appropriate secondary containment will be utilized when equipment maintenance is conducted on location. KMOG will shut down transfer pump and close supply valve when transfer or circulation is completed. KMOG will ensure fluids cannot enter holding tank through gravity feedback. Pre-job inspection will be conducted prior to start up which include the visual inspection of hoses, lines, and valves to ensure proper connection and alignment. During operations, all fluid containing equipment is inspected daily.</p> <p>C. Completion Operations During completion operations, the following site-specific best management practices will be used: KMOG will monitor pressure responses and containment to identify potential leaks. Lines will also be walked continuously throughout operations (between stages) to identify potential leaks. In addition, there is a slam valve and control valve with Emergency Shut Down system in line to the external temp tanks to prevent overflowing tanks during the flowback duration.</p> <p>D. Production Operations During production operations, the following site-specific best management practices will be used: Automation technology will be utilized at this facility. All automation is monitored by KMOG's Integrated Operations Center (IOC), which is manned 24 hours per day, 7 days per week. All personnel on location on behalf of KMOG are trained in AVO techniques. All personnel are empowered with 'Stop Work Authority' and to report any leaks immediately.</p>

14	Material Handling and Spill Prevention	<ul style="list-style-type: none"> <li>- Wastes will be stored in containers or on lined containment that are chosen for compatibility and checked periodically for leaks or integrity problems. Examples of containment include but are not limited to 3-sided steel tanks, steel tanks, lined containment, plastic totes, drums, etc.</li> <li>- All specific wastes in the attached site-specific Table (in the Waste Management Plan) will have a detailed Safety Data Sheet available which includes information such as the properties of the wastes; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical.</li> <li>- The proper personal protective equipment will always be worn when handling waste. Employees will refer to the Safety Data Sheet for additional information.</li> <li>- Good housekeeping measures will be implemented in the operating area and to ensure safety and environmental well-being.</li> <li>- Wastes will be segregated and stored according to its waste type.</li> <li>- Wastes will be recycled, re-used, or treated onsite. As a BMP fluid are generally reused from location to location. No onsite treatment or recycling is planned onsite for this location. In the event, that onsite treatment or recycling is feasible, a written management plan will be submitted to the COGCC Director for approval on a Form 4</li> </ul>
15	Dust control	<ul style="list-style-type: none"> <li>- When necessary, KMOG will proactively deploy fresh water to suppress dust along the existing permanent private road and access road to well pad/facility during all phases of preproduction operations</li> <li>- Speed limits will be reduced to 20 mph on the existing permanent private road, 10 mph on new access road and 5 mph once vehicles reach well pad/ facility</li> <li>- Access roads and Vehicle Tracking Control will receive maintenance throughout operations</li> <li>- In the event of high winds that generate dust that cannot be mitigated with an application of water, KMOG will shut down construction operations</li> <li>- During the Completion phase, KMOG will utilize a fully enclosed Sand Containerized Proppant Delivery System that eliminates the use of pneumatic transfer on location. This methodology utilizes a gravity choke feed system that reduces dust significantly. The dust levels from this system are minimal and below Occupational Safety and Health Administration (OSHA) permissible exposure limit which eliminates the need for additional Personal Protective Equipment (PPE)</li> </ul>
16	Construction	Fencing Requirements: The completed wellsites will be surrounded with a fence and gate with adequate lock to restrict access to authorized personnel only. KMOG personnel will monitor the wellsites upon completion of the wells. Authorized representatives and/or KMOG personnel shall be on-site during drilling and completion operations.
17	Noise mitigation	KMOG will install 16-foot full wrap sound walls for pre-production operations that occur at the Locations during the Pronghorn Winter Concentration Area HPH and proposed Mule Deer Severe Winter Range HPH seasonal timing window (December 1 – April 30). Sound walls will not be installed for operations that occur outside the seasonal timing window.
18	Emissions mitigation	Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate completion techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, KMOG shall not produce the wells. KMOG combusts gas during the facility commissioning process, and agrees to comply with both Rules 903.c.(3).B. and 903.c.(3).C.

19	Odor mitigation	<p>Best Management Practices (BMP) used during drilling:</p> <ul style="list-style-type: none"> <li>- All oil-based drilling fluids will be built using a Group III base oil with negligible aromatic content and PAH less than 0.001% so that it does not emit odor during all production drilling operations.</li> <li>- The Group III base oil will be utilized in a closed loop drilling fluid system and eliminate odor at the shakers, transfer tank, active/reserve tanks, and cuttings in collection tanks and during transport.</li> <li>- All drill cuttings are processed through centrifugal dryers to remove residual oil-based drilling fluid not removed by shale shakers.</li> <li>- All tubulars pulled out of the hole will be wiped prior to being racked in the derrick or laid down.</li> <li>- Cuttings storage time on location will be minimized prior to transport to local landfills.</li> <li>- New drilling fluid will be built using transfer line outlets located below tank fluid level to minimize splashing/agitation. New fluid will only be built using Group III base oils.</li> </ul> <p>Best Management Practices used during production:</p> <ul style="list-style-type: none"> <li>- KMOG uses pipelines to transport hydrocarbons (oil &amp; gas) and produced water from the production facility eliminating odors that could occur during truck loading.</li> <li>- Production facilities are inspected regularly by KMOG to make sure the equipment is working properly and necessary maintenance is performed, to reduce potential odors. KMOG incorporates Audio, Visual, Olfactory (AVO) observations at production facility inspections.</li> <li>- KMOG will use BMPs to reduce unloading events and to reduce potential odor causing emissions when liquids unloading is necessary (i.e., maintenance activities to remove liquids from existing wells that are inhibiting production).</li> <li>- KMOG remotely monitors production facilities, this reduces traffic onto production facilities which may create odors from truck traffic.</li> </ul>
20	Drilling/Completion Operations	Guy line anchors will not be used. Base Beams will be used to stabilize the rig and removed after drilling.
21	Interim Reclamation	Post construction, daily inspections will be completed by on-site operations personnel. A third-party consultant will conduct stormwater compliance inspections every 30-days until final stabilization is achieved. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed, including weed maintenance when necessary. Maintenance and repair will be completed as soon as practicable, immediately in most cases.
22	Interim Reclamation	Topsoil will be managed during construction by a combination of site-specific erosion and sediment control measures including: a temporary diversion ditch & berm around the entire location to manage run-on and run-off; short term management of topsoil will include track packing to prevent wind and water erosion, long term management includes seeding with a native seed mix and crimping straw mulch for erosion control and water retention; vegetation establishment on stockpiles and weed control will reduce erosion as well as maintain microbial activity; during the construction phase topsoil will be stockpiled to minimize erosion potential. Topsoil managed during interim and production phases will be maintained with BMPs including seeding with a native seed mix and crimped straw mulch; weed monitoring; the longterm topsoil stockpile will maintain microbial activity for an extended time. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed, including weed maintenance when necessary. Maintenance and repair will be completed as soon as practicable, immediately in most cases.
23	Final Reclamation	Well Site Cleared: The wellsite will be cleared of all non-essential equipment within ninety (90) days after all wells associated with the pad have been plugged and abandoned.
24	Final Reclamation	Identification of Plugged and Abandoned Wells: Once the well has been plugged and abandoned, KMOG will identify the location of the wellbore with a permanent monument that will detail the well name and date of plugging.

Total: 24 comment(s)

### Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403382209	SURFACE AGRMT/SURETY
403382212	ACCESS ROAD MAP
403382213	DIRECTIONAL WELL PLAT
403382216	LOCATION DRAWING
403382217	RELATED LOCATION AND FLOWLINE MAP
403382218	LOCATION PICTURES
403382220	NRCS MAP UNIT DESC
403382223	LOCATION AND WORKING PAD GIS SHP
403382224	OTHER
403382227	LGD CONSULTATION
403382230	GEOLOGIC HAZARD MAP
403382231	REFERENCE AREA MAP
403382236	REFERENCE AREA PICTURES
403382243	CDPHE CONSULTATION
403454954	WILDLIFE HABITAT DRAWING
403460554	CULTURAL FEATURES MAP
403467085	PRELIMINARY PROCESS FLOW DIAGRAMS
403575522	CPW CONSULTATION
403576514	OTHER
403597256	HYDROLOGY MAP
403598137	LAYOUT DRAWING
403598592	ALA NARRATIVE SUMMARY
403598834	CPW WAIVER
403598876	ALA DATASHEET

Total Attach: 24 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Returned to DRAFT for operator to make corrections/revisions.	08/25/2023

Total: 1 comment(s)

## **Public Comments**

No public comments were received on this application during the comment period.

