

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Maybelle Wilson Phone:

Address: PO Box 632 Fax:

Address: Email:

City: Mead State: CO Zip: 80542

Surface Owner: Fee State Federal Indian

Check all that apply. The Surface Owner: is the mineral owner
 is committed to an oil and Gas Lease
 has signed the Oil and Gas Lease
 is the applicant

The Mineral Owner beneath this Oil and Gas Location is: Fee State Federal Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: Surface Surety ID:

Date of Rule 306 surface owner consultation 09/07/2016

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe):

Subdivided: Industrial Commercial Residential

Future Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe):

Subdivided: Industrial Commercial Residential

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	587 Feet	387 Feet
Building Unit:	785 Feet	870 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	1157 Feet	667 Feet
Above Ground Utility:	1151 Feet	661 Feet
Railroad:	820 Feet	1271 Feet
Property Line:	282 Feet	125 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- Buffer Zone
 Exception Zone
 Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.
- Large UMA Facility - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 05/07/2018

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

The facilities have been placed at this location per the surface owner's request. The location of this facility pad is what was agreed upon in the SUA. The ground level drops off severely to the North & Northeast due to the presence of the creek/gully. Further to the west we would be off of the surface owner's land (who we do not have an SUA with). Further east and we are closer to the nearest building units. The nearby house to the northeast is owned by the surface owner. The other nearby house to the southeast is as far as possible from the production facilities - which have been placed to the northwest of the drilling pad. All other building units are over 1000' away.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: Wiley-Colby complex, 1 to 3 percent slopes #82

NRCS Map Unit Name: Otero sandy loam, 5 to 9 percent slopes #53

NRCS Map Unit Name: _____

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes No

Plant species from: NRCS or, field observation Date of observation: _____

List individual species:

Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- Alpine (above timberline)
- Other (describe): _____

WATER RESOURCES

Is this a sensitive area: No Yes

Distance to nearest

downgradient surface water feature: 435 Feet

water well: 3907 Feet

Estimated depth to ground water at Oil and Gas Location 6 Feet

Basis for depth to groundwater and sensitive area determination:

Receipt: 9064715
Permit #: 51869- - has a depth to ground water of 6'.

Is the location in a riparian area: No Yes

Was an Army Corps of Engineers Section 404 permit filed No Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer zone: No

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

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

Federal (FEMA)

State

County

Local

Other _____

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

WILDLIFE

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on _____

Operator Proposed Wildlife BMPs

No BMP

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area

Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)

Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)

Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)

Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

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

OPERATOR COMMENTS AND SUBMITTAL

Comments This location is already built. The ammendment is being done to expand the pad by 2 acres in order to place a second MLVT pad. This expansion is in the south west corner of the pad.

1. The manufacturer of the TLVST is Brewer Steel Company
2. The size of the TLVST is 60,000 BBLs
3. The anticipated time frame the TLVST will be onsite is three weeks.
4. A Construction Layout Drawing depicting the placement of the MLVT's has been attached.

SUA Parcel map Attached as "Other"

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: _____ Email: glee@gwogco.com

Print Name: Geoff Lee Title: Regulatory Analyst

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders 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.

COA Type

Description

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

Best Management Practices

No BMP/COA Type

Description

1	Traffic control Traffic Plan - Rule 604.c.(2)D. An access route from the highway or county road to the proposed oil and gas location has been prearranged. Required access road permits will be obtained before construction begins and any special requirements outlined by the municipality will be followed. Emergency routes will be chosen prior to the commencement of operations and will be clearly marked and maintained throughout drilling, completion and production activities.
2	General Housekeeping General Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur cleanup will be implemented within 24-48 hours, as appropriate, to minimize any commingling of waste materials with storm water runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup will consist of patrolling the roadways, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.

3	General Housekeeping	<p>Removal of Surface Trash - Rule 604.c.(2)P All surface debris, trash, unusable scrap, or solid waste from the facility will be properly temporarily stored on location in a secure container and ultimately removed and disposed of in a legal manner.</p>
4	Storm Water/Erosion Control	<p>Storm Water Management Plans (SWMP) Storm Water Management Plans (SWMP) are in place to address construction, drilling and operations associated with Oil and Gas development throughout the state of Colorado in accordance with Colorado Department of Public Health and Environment (CDPHE). Storm water controls will be constructed around the perimeter of the site prior to construction. Typically, GWOC utilizes a ditch and berm system of storm water control at its sites. BMP's used are determined just prior to construction by a third party storm water contractor and may vary according to the location. Storm water controls will remain in place until the pad is stabilized or reaches final reclamation.</p>
5	Material Handling and Spill Prevention	<p>*MLVT Certification Statement: Great Western Operating Company certifies that the MLVTs on this location will be designed and implemented consistent with the COGCC Policy on the use of MLVTs in the state of Colorado.</p>
6	Material Handling and Spill Prevention	<p>Material Handling and Spill Prevention Spill Prevention Control and Countermeasures (SPCC) plans in place to address any possible spills associated with Oil and Gas operations throughout the state of Colorado in accordance with CFR 112. In accordance with COGCC Rule 1002.f.(2)A. & B., shall provide a designated storage area for dry bulk chemicals and miscellaneous fluids. The dry chemicals in the storage area shall be adequately protected to prevent contact with precipitation, shall be elevated above storm- or standing water, and shall provide sufficient containment for liquid chemical storage to prevent release of spilled fluids from impacting soil, surface water or groundwater and will prevent the co-mingling of spilled fluids or chemicals with other E&P Waste.</p>
7	Material Handling and Spill Prevention	<p>Leak Detection Plan - Rule 604.c.(2)F. GWOC designs its new facilities to both avoid leaks or releases as well as to help detect them in a time-efficient manner to minimize potential impacts. Tanks and all visible pipelines and valves etc. are inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures. In addition, our company lease operators and Production staff review production records, including volumes and pressures, looking for irregularities that may indicate a problem with a tank or pipeline. If an irregularity is detected that may indicate a potential release the suspect tank and/or pipeline(s) are removed from service, isolated, and either pressure tested or visibly inspected for indications of a potential leak.</p>
8	Material Handling and Spill Prevention	<p>Berm Construction - Rule 604.c.(2)G. A minimum containment capacity of 150% of the single largest storage vessel inside the containment will be constructed around any liquids storage area within a designated setback zone. For this location, steel containment with sealed liners will be utilized at all storage facilities on this location.</p> <p>Tanks and all visible pipelines and valves etc. will be inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures.</p>

9	Material Handling and Spill Prevention	<p>Fencing requirements - Rule 604.c.(2)M</p> <p>At a minimum GWOC installs appropriate fencing to restrict access by any unauthorized persons. This fencing may vary depending on site-specific situations, such as reasonable security, local government or surface owner concerns. Fencing will be properly noted on facility. Fencing will be properly noted on facility layout diagrams for both drilling/completion and the production phases of operations.</p>
10	Material Handling and Spill Prevention	<p>Control of Fire Hazards - Rule 604.c.(2)N</p> <p>GWOC constructs and operates our facilities to meet state and API codes, as appropriate, including API RP 500 electrical classifications inside bermed areas. Any unused potentially flammable materials are moved a minimum distance of 25-feet from wellhead, tanks, and separator areas. In addition, GWOC implements a Hot Work Permit Program for employees and contractors doing any defined 'Hot Work' activities on GWOC locations.</p>
11	Material Handling and Spill Prevention	<p>Tank specifications - Rule 604.c.(2)R</p> <p>All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). GWOC shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director. Only the 2008 version of NFPA Code 30 applies to this rule.</p>
12	Dust control	<p>Dust Control</p> <p>Dust control measures may include surface stabilization, or dust control with appropriate chemical or later applications.</p>
13	Construction	<p>Access Roads - Rule 604.c.(2)S</p> <p>All access roads are designed, constructed, and maintained such that heavy equipment, including emergency response vehicles, can readily access and exit the location. The pad has all weather access roads to allow for operator and emergency response. In addition, GWOC will implement manual mud mitigation measures (eg. tracking control rock aprons) at location exits onto paved roads as necessary and in conjunction with county requirements.</p>
14	Noise mitigation	<p>Sound and Light Mitigation</p> <p>During the drilling and completions phase, Great Western plans to construct sound/visual walls that will be placed along the edges of the pad. This will also assist to block out any lighting from nearby occupied structures. This pad will be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping.</p> <p>Light sources will be directed downwards, and away from occupied structures where possible. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.</p>
15	Noise mitigation	<p>Noise - Rule 604.c.(2)A.</p> <p>Great Western Operating Company, L.L.C. (GWOC) will operate in accordance with permissible noise levels per COGCC Rule 604.c.(2)A. and 802, as applicable. Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist with noise mitigation. These practices will be implanted upon initiation of drilling and production.</p>
16	Odor mitigation	<p>Odors Mitigation:</p> <p>Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist in mitigating potential odors. Sealed tanks with pressure relief valves and emissions controls will be utilized for the production phase. Great Western will be using a synthetic oil based drilling fluid called D822. Based upon laboratory analysis, the D822 contains lower levels of VOC and aromatics when compared to diesel. This will be used during the drilling phase in order to minimize any possible odors emitting from the site.</p>

17	Drilling/Completion Operations	Closed Loop Drilling – Pit Restrictions Rule 604.c.(2)B. Great Western Operating Company, LLC (GWOC) will be utilizing a closed loop drilling system.
18	Drilling/Completion Operations	Green Completions – Emissions Control System Rule 604.c.(2)C. As applicable, per COGCC Rule 805, GWOC will utilize all reasonable and cost-efficient best practices, including but not limited to those listed in Rule 805, to maximize resource recovery and mitigate releases to the environment. <ul style="list-style-type: none"> • Initial frac and drill out effluent is routed through a sand catcher/trap and a junk/sand tank to remove sand and well frac debris. • Once any hydrocarbons are detected but prior to encountering salable quality combustible gas or significant volumes of liquid hydrocarbons (condensate or oil) (greater than 10 barrels per day average) the effluent is routed through a high-pressure separator and closed-top tanks to minimize emissions to the environment. Hydrocarbon liquids, produced water, and sand are separated utilizing the high-pressure separator. • The quality (combustibility) of the gas is typically monitored directly at the high pressure separator. When salable (combustible) quality gas is measured/detected the gas stream is immediately diverted to the sales pipeline or the well is shut in. • The separated produced water and hydrocarbon liquids (condensate/oil) are directed to specific tanks for storage until being unloaded and hauled to disposal or sales as appropriate.
19	Drilling/Completion Operations	Multi-well Pads - Rule 604.c.(2)E. This is a multi-well pad. GWOC utilizes multi-well pads wherever technically and economically practical to minimize potential impacts to neighbors and the environment. The pad has all weather access roads to allow for operator and emergency response.
20	Drilling/Completion Operations	BOPE for well servicing - Rule 604.c.(2)J A BOPE with a minimum pressure rating of 3,000 psi will be utilized. At a minimum it will consist of 2 ram preventers and 1 annular preventer. The blind rams will be positioned below the pipe rams. A backup system of pressure control will be onsite consisting of at a minimum 1,000 psi accumulator (backup pressure). Accumulator is tested to 1,000 psi. Operator may use fixed sized pipe rams matching the tubular size. The annular preventer will be pressure tested to 250 psi low and 2,000 psi high for 10 minutes each. The ram preventers will be tested to 250 psi low and 2,500 psi high for 10 minutes each. All remaining well control equipment will be tested to 250 psi low and 2,500 psi high for 10 minutes each. The pressure tests will be conducted when the equipment is first installed and every 30 days thereafter. Pipe rams and blind rams will be function tested before every well service operation. Annual BOP inspections and pressure tests will be performed by the service company and will be charted & retained for 1 year. Backup stabbing valves shall be used on operations that require reverse circulation. Valves will be pressure tested before each well service operation in low pressure and high pressure range. The GWOC onsite representative will be certified in Well Control Operations by a Well-Cap certified training service.
21	Drilling/Completion Operations	Pit level indicators - Rule 604.c.(2)K GWOC does not typically utilize pits in any of its operations. No pits will be used for this facility.
22	Drilling/Completion Operations	Load lines - Rule 604.c.(2)O In any designated setback zone all load lines are capped or bull-plugged or locked shut to reduce the likelihood of a release occurring. In addition, GWOC places all load line receivers/valves inside secondary containment areas or in a proper load line containment device or both.

23	Drilling/Completion Operations	<p>Guy line anchors - Rule 604.c.(2)Q Great Western will primarily utilize Base Beams to stabilize the rig and removed after drilling. In the event Great Western is unable to use a rig with Base Beams, Guy Line Anchors will be utilized. In the event guy line anchors are utilized and left buried for future use shall be identified by a brightly colored marker at least 4-foot in height and within 1-foot to the east of the anchor.</p>
24	Drilling/Completion Operations	<p>Identification of P&A wells - Rule 604.c.(2)U GWOC shall identify the location of the P&A wellbore with a permanent monument as specified in Rule 319.a.(5). The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument. P&A wellbores shall be cutoff well below ground surface in agricultural areas to provide for landowners to safely farm the reclaimed well area.</p>
25	Drilling/Completion Operations	<p>Development from existing well pads - Rule 604.c.(2)V Where possible, GWOC shall provide for the development of multiple reservoirs by drilling on existing pads. GWOC strives to utilize multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. Multi-well pads are not always feasible due to numerous possible issues including but not limited to; landowner requirements, topographic constraints, well bore reaches, setback requirements, etc.</p>
26	Drilling/Completion Operations	<p>Wellbore Collision Prevention (Rule 317.r) Prior to drilling operations the operator will perform an anti-collision evaluation of all active (producing, shut-in or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice shall be given to all offset operators prior to drilling.</p>
27	Drilling/Completion Operations	<p>Oil-Based Drilling Fluids and Drill Cuttings Waste Management Oil-based drilling fluids (OBDF) will be separated from the cuttings at surface. At the end of its use on a particular well, the liquid oil-based mud will be reused for additional drilling operations or it will be returned to then vendor who originally supplied the mud. Transportation will occur on a daily basis as required to facilitate on ongoing drilling operations. Oil-based drill cuttings (OBDC) will be separated from liquid mud onsite and the cuttings will be temporarily stored onsite in steel bins. Accumulated cuttings will be transported for permanent disposal to a licensed solid waste disposal facility. The actual solid waste disposal facility that will be used will depend on geographic proximity to the well being drilled. Transportation will occur on a daily basis as required to facilitate ongoing drilling operations.</p>
28	Final Reclamation	<p>Well site cleared - Rule 604.c.(2)T Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.</p>

Total: 28 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
401647515	SURFACE AGRMT/SURETY
401647516	LOCATION PICTURES
401647517	CONST. LAYOUT DRAWINGS
401647519	FACILITY LAYOUT DRAWING
401648225	LOCATION DRAWING
401648228	MULTI-WELL PLAN
401648231	ACCESS ROAD MAP
401648233	HYDROLOGY MAP
401648573	WASTE MANAGEMENT PLAN
401650236	OTHER
401662077	PRE-APPLICATION NOTIFICATION CERTIFICATION
401667645	NRCS MAP UNIT DESC
401667647	NRCS MAP UNIT DESC

Total Attach: 13 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

Public Comments

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

