FORM 2A Rev 04/18

State of Colorado
Oil and Gas Conservation Commission

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

Oil and Gas Location Assessment

Document Number: 401650784

Date Received: 05/31/2018

☐ New Location ☒ Refile ☐ Amend Existing Location Location#: 429150

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 http://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID: **429150**

Expiration Date: **07/07/2021**

☐ This location assessment is included as part of a permit application.

CONSULTATION

☐ This location is included in a Comprehensive Drilling Plan. CDP #
☐ This location is in a sensitive wildlife habitat area.
☐ This location is in a wildlife restricted surface occupancy area.
☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 77330
Name: SG INTERESTS I LTD
Address: 100 WAUGH DR SUITE 400
City: HOUSTON State: TX Zip: 77007

Contact Information

Name: Tracy Arnett
Phone: (970) 3850696
Fax: (970) 3850636
email: tarnett@sginterests.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20030098 ☐ Gas Facility Surety ID (Rule 711):
☐ Waste Management Surety ID (Rule 704):

LOCATION IDENTIFICATION

Name: Federal 11-90-24 Number: 3
County: GUNNISON

QuarterQuarter: LOT 4 Section: 24 Township: 11S Range: 90W Meridian: 6 Ground Elevation: 7396

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 842 feet FSL from North or South section line
118 feet FEL from East or West section line

Latitude: 39.080720 Longitude: -107.387440

PDOP Reading: 1.3 Date of Measurement: 11/20/2011

Instrument Operator's Name: David Nicewicz

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 #
☐		

FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	1	Oil Tanks*		Condensate Tanks*	1	Water Tanks*	4	Buried Produced Water Vaults*	
Drilling Pits		Production Pits*		Special Purpose Pits		Multi-Well Pits*		Modular Large Volume Tanks	
Pump Jacks	1	Separators*	1	Injection Pumps*		Cavity Pumps*		Gas Compressors*	
Gas or Diesel Motors*		Electric Motors		Electric Generators*		Fuel Tanks*		LACT Unit*	
Dehydrator Units*		Vapor Recovery Unit*		VOC Combustor*		Flare*	1	Pigging Station*	

OTHER FACILITIES*

Other Facility Type	Number
Water Transfer Pump	1

*Those facilities indicated by an asterisk (*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

One (1) 2-4 inch steel water pipeline and one (1) 3-6 inch steel gas pipeline will be installed on pad and tied to existing pipelines off the well pad location. Temporary 12-24 inch poly pipeline may be used on the surface at times to bring completion water to the location from the McIntyre Pits 3 & 4 and/or the McIntyre Tanks 1 & 2. Flowback will return to the pits via this temporary pipeline system. The temporary poly pipelines would likely be located on the pad, and along other previously disturbed areas such as existing roads and pipeline corridors where feasible.

CONSTRUCTION

Date planned to commence construction: 09/03/2018 Size of disturbed area during construction in acres: 1.86

Estimated date that interim reclamation will begin: 10/15/2018 Size of location after interim reclamation in acres: 1.72

Estimated post-construction ground elevation: 7396

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H_2S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

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: Nick Hughes Phone: 970-874-1836

Address: 708 1250 Road Fax:

Address: Email:

City: Delta State: CO Zip: 81416

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: Yes

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

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:	3179 Feet	3213 Feet
Building Unit:	3209 Feet	3245 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	2620 Feet	2661 Feet
Above Ground Utility:	3423 Feet	3457 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	842 Feet	687 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: _____

FOR MULTI-WELL PADS AND PRODUCTION FACILTIES 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.

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 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: 38. Fughes loam, 15-25% slopes

NRCS Map Unit Name: _____

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: 10/17/2011

List individual species: big sagebrush, shrubs, grasses

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: 210 Feet

water well: 2554 Feet

Estimated depth to ground water at Oil and Gas Location 50 Feet

Basis for depth to groundwater and sensitive area determination:

A stock pond is located NE of the well site, approx. 210' from the well head and 3.3' from the edge of the disturbed area. This stock pond will most likely be re-located per landowner direction during pad construction. There are no water wells in close vicinity to the project site. Per the SEO, the closest water well with a reported depth (permit #33875) is approx 2554' NE of the well and has depth of 50'.

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 608

WILDLIFE

☐ This location is included in a Wildlife Mitigation Plan

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

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: The previously approved Form 2A's for this location are doc#400251597 and doc#400818364. SG will apply the COA's as included on the previously approved Form 2A's as well as those attached to this refile.
No changes have been made to the location of this well pad.
There have been no changes to the surrounding land use.

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

Signed: _____ Date: 05/31/2018 Email: tarnett@sginterests.com

Print Name: Tracy Arnett Title: Permitting

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: 7/8/2018

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
	Planning: The following COAs will apply: COA 91 - In addition to the notifications required by COGCC listed in the Northwest Notification Policy (Notice of Intent to Construct a New Location and Notice of Intent to Commence Hydraulic Fracturing Operations) and Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment and c. Notice of Construction or Major Change); operator shall notify the COGCC 48 hours prior to onsite and offsite pipeline testing (temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions). The appropriate COGCC individuals will automatically be email notified. COA 95 - The approved Form 2A #401650784 (as well as any Form 2 or Form 4 containing applicable COA's for this location shall be posted onsite during construction, drilling, and completions operations.
	Construction: The following COAs will apply: COA 23 - Operator must ensure secondary containment for any volume of fluids contained at the' well pad facility' during construction, drilling, and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices [BMPs] associated with fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals, and maintained in good condition. COA 44 - The access road will be constructed and maintained to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters. COA 76 - Strategically apply fugitive dust control measures to access roads to reduce fugitive dust and coating of vegetation and deposition in water sources. Operator shall employ practices for control of fugitive dust caused by other operations, including, but not limited to the use of speed restrictions, regular road maintenance, restriction of re-construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers may be used. COA 27 - Operator shall stabilize exposed soils and slopes as an interim measure during temporary remote frac pad operations at this site. COA 24 - The surface soils and materials are fine-grained (clay and clay loams) and highly unconsolidated; therefore appropriate BMPs need to be in place during all pad construction, as well as drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

	Drilling / Completion Operations: The following COAs will apply: COA 11 - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. COA 25 - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The entire level pad will be surrounded by a berm with a drainage ditch constructed interior to that berm in order to contain any potential release on the well pad. The berm is approximately 2 ½ feet in height around the pad except at the access road entrance where a culvert is located. Any fluid in the interior drainage ditch would be contained in the ditch and culvert until clean up. During fracturing operations, the site will be manned 24-hours per day so that any leak or spill can be quickly identified and dealt with. Tanks will be set on compacted earth to decrease the permeability of the soil.
	Emissions Mitigation: The following COA will apply: COA 26 - Potential odors associated with the water storage and transfer operations (including any flowback operations associated with completion operations) must be controlled/mitigated.

	Material Handling and Spill Prevention: The following COAs will apply to this Form 4 if any temporary surface (COAs 44, 45, 46, 47, 48, and 54) or buried permanent offsite pipelines (poly or steel, COA 45) are used during completion operations at this temporary remote frac pad facility: COA 44 - If fluids are conveyed via pipeline, operator must implement BMPs to control any unintentional release of fluids in a timely manner, especially at locations near surface water features. COA 45 - Operator shall pressure test pipelines (any temporary surface lines used for hydraulic stimulation and/or flowback operations) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance. COA 46 - Operator will design their infrastructure and utilize pipeline materials to exceed required pressures and flow rates. Under normal operating conditions, poly lines will be used at no greater than 80% of all manufacturer suggested maximum pressure and flowrates. Pumps used in this project will operate at pressures 20 percent below the maximum operating pressure of the poly pipeline at all times. COA 47 - Operator will utilize, to the extent practical, all existing pipeline infrastructure for the storage and transfer of water for use in the temporary remote frac pad facilitiy operations at this location . If temporary surface pipelines are needed, operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area. COA 48 - Operator must implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located. Prior to operation, pipelines will be air and/or hydro tested for integrity. When in operation, pump stations will be manned to ensure immediate response to pressure changes or pump issues. Qualified personnel, interconnected via 2-way radio, manning each booster pump will carefully synchronize pump turn-on and shut-down according to written and practiced procedure. The entire line will be monitored, where feasible, during pumping and flowback operations. The operator’s Poly Pipeline Operation Plan that was submitted to the federal agencies requires daily inspection of surface poly lines during use. Operator will endeavor to minimize surface disturbance during pipeline monitoring. COA 54 - Operator must utilize appropriate secondary containment for any volume of fluids that may be released before pump shut down from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings. For stream or intermittent stream crossings, operator will ensure appropriate containment by installing over-sized pipe “sleeves” which extend the length of the crossing and beyond to a distance deemed adequate to capture and/or divert any possible release of fluids and prevent infusion into the stream water. Any catchment basins constructed, if necessary, would be sized to contain this volume of fluid as described in the permit approval documents for the McIntyre Flowback Pits.

Best Management Practices

No	BMP/COA Type	Description
1	Planning	• Cuttings will be stored in lined containers. Additional pits may be constructed for the potential of overflow cuttings. Constructed drilling pit(s) used for cuttings will be lined with an impervious liner. • Fluids contained at the well site during drilling and completion operations will have secondary containment. • Project will be constructed and operated in compliance with the terms and stipulations applied to permits by the Colorado Department of Public Health and Environment (CDPHE) - Colorado Air Quality Control Division, Colorado Water Quality Control Division, Colorado Oil and Gas Conservation Commission (COGCC) and the Bureau of Land Management • Impacts to wildlife habitat, agriculture, water resources, recreation, visual resources, and grazing were considered when siting the access road, well pad, pipeline, and other facilities associated with construction of this project. In addition, SGI involved the private landowner in siting the proposed project(• Stormwater, vegetation, soil, and visual impacts were considered when planning orientation, and cut and fill slopes. • SGI plans for well pads, facilities, roads and pipelines to be near existing infrastructure, where possible, and to minimize the number, size and distribution of project as practicable. SGI adequately sizes pipelines, well pads, and facilities to accommodate both current and future drilling plans, and expected gas production. • The pipeline right-of-way (ROW) and access road is minimized as much as practicable while also maintaining safe construction and use conditions. • Implement pre-disturbance wildlife and vegetation surveys when necessary; appropriate mitigation measures will be implemented as applicable. • Involve local stakeholders and landowners, as necessary, with the planning process to reduce land-use conflicts.
2	General Housekeeping	• The well pad location, access road, pipeline, and any associated facilities will be kept orderly and as clean as practicable. • Garbage and trash will be stored in a trash container and periodically emptied at an approved disposal facility. • A portable latrine will be provided during drilling and completion operations; wastes will be pumped and hauled to an approved sanitation facility. • SGI maintains an active stormwater permit though the Colorado Division of Public Health and Safety (CDPHE), and an active Spill Prevention, Control and Countermeasure (SPCC) plan.
3	Wildlife	• In the event a proposed project is located in designed Colorado Parks and Wildlife (CPW) Sensitive Wildlife Habitat (SWH), or Restricted Surface Occupancy Areas (RSO), SGI will construct and operate in compliance with COGCC Rule 1203, General Operating Requirements in SWH and RSO, unless the Director has granted a waiver. • SGI will continue educating employees on wildlife protection practices, including driving safe speeds and to be alert to wildlife and livestock on roadways. • When necessary, and when agreed upon by the surface owner, fence livestock and wildlife out of active construction sites and newly reclaimed areas until reclamation standards have been met and plants are capable of sustaining grazing and trampling.
4	Storm Water/Erosion Control	As part of the requirements to maintain the CDPHE field-wide stormwater permit, SGI will maintains a site-specific stormwater plan for this site. The SGI Master Stormwater Management Plan and the Site Specific Data Sheet (SSDS) identifies all potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated with construction activity from the facility, and describes the stomwater BMPs implemented to reduce potential pollutants in stormwater discharges. Upon achieving final stabilization per CDPHE requirements and site closure, stormwater will be maintained per COGCC post-stormwater program rules.

5	Material Handling and Spill Prevention	• Drill cuttings from the containers and pit(s), as well as the pit liner will be disposed of at a permitted disposal facility. Pit liners will be removed following removal of the dry cuttings. They will be disposed of at a solid waste disposal facility. • If applicable, soil testing under a removed liner area will be conducted prior to backfilling the pit area according to the COGCC 900-series rules. • Material Safety Data Sheets (MSDS) for all chemicals and hazardous material that are used during drilling, completion, and producing will be maintained as per 29 CFR 1920.1200(g). • Any petroleum product or other spills that is reportable under any regulatory agency will be cleaned up immediately and the material will be hauled to an approved facility. SGI and their contractors will prevent gasoline, diesel fuel, oil, grease, or any other petroleum products and drilling fluids from migrating off the location or from entering any live stream or riparian area. A spill kit will be readily available during drilling and completion operations. Fuels and lubricants will be transported by fuels distributors and will be stored in facilities specifically designed for that purpose. • Drilling fluids will be disposed of at a permitted commercial disposal facility.
6	Construction	• Roads will be maintained by surfacing, crowing, and/or maintaining ditches to prevent runoff from damaging water quality. • Outlet protection will be installed at culvert outlets to prevent scouring. Rock check dams will be installed and maintained where appropriate to slow flowing water and prevent erosion and sedimentation. • Water or other dust suppressant will be applied to roads and other work sites as needed to control fugitive dust. • Limit speeds on access roads and work sites to prevent road damage and dust problems. • Where applicable, schedule stream/river crossings at low water periods to minimize disturbance. • Implement and maintain erosion and sedimentation control devices as described in the SSDS or MSWMP. • Reduce the ROW width as much as practicable, and use equipment matting when crossing wetlands and streams. • Complete waterbody and wetland crossings within 24 hours, if practicable. Use trench breakers when needed to prevent water from flowing from waterbodies into pipeline trenches. Implement other conditions of approval, as defined in the Army Corps of Engineers permit, if applicable. • Construct water bars along pipeline ROW to prevent erosion on hillsides. Install trench breakers around the pipe to prevent water from flowing along the buried pipe causing trench subsidence. • Crown pipeline trenches to allow for soil compaction over time and prevent subsidence. • Construct fences and netting that are appropriately sized and reinforced to function in the environmental conditions and for the species of the region. • Salvage and store topsoil from the surface of all construction areas for use during interim and final reclamation. • Protect soil and spoil piles during storage with sediment barriers, if needed. Use temporary seeding on stock-piled soils. • Educate employees and contractors about weed issues. • When working in water (wetlands, ponds, etc.), SGI will make sure equipment that comes in contact with water, such as water tanks, water trucks, etc. is clean and free of aquatic nuisance species. Cleaning will be accomplished by following the protocol described in CGOCC Rule 1204.a.2. SGI will require contractors to follow the same protocol when bringing in equipment to work in water.

7	Drilling/Completion Operations	• Maintain wildlife fencing and netting as needed. • Promptly report spills to agencies as required. • Store emergency spill response equipment at centralized locations so that it is readily available in the event of a spill. • Instruct all contractors and field employees on the aspects of the spill prevention and response plan relevant to their position at the start of their employment. • Limit vehicle and equipment parking to designated parking areas. • Screen water suction hoses to exclude fish and other aquatic life when necessary. • Reduce noise by using effective sound dampening devices and/or techniques, as required. • Use centralized frac'ing facilities where water is stored for reuse between operations. Connect water storage facilities to well sites with buried or temporary pipelines to reduce truck traffic where practicable. • Use recycled flowback fluid where possible in additional frac'ing operations by storing it in a centralized tank or pit facility. • Use produced water as much as practicable in frac'ing operations to reduce use of fresh water. • Whenever a cuttings pit is left open prior to reclamation, it will be fenced and covered with netting or tarps to prevent wildlife and birds from entering the pit. If it necessary to postpone pit closure due to winter conditions, excess water will be removed from the pit and solids in the pit will be fenced and tarped and will exclude wildlife and birds.
8	Interim Reclamation	• Gate access roads, where necessary, to minimize and control access and reduce disturbance. • Control fugitive dust that could result from production and reclamation activities. • Avoid direct discharge of pipeline hydrostatic test water to any lake, wetland, or natural stream or river. Use appropriate erosion and sedimentation devices as specified in the hydrostatic discharge permit/plan. • Locate, design, and paint aboveground facilities to minimize the impact to visual resources. • Control listed Colorado and County noxious weeds. • Use locally adapted seed in reclamation efforts whenever available and approved by the landowner. • Prepare the seedbed appropriately prior to seeding an area. Replace rocks on surface at density of surrounding areas, where applicable. • When practicable, seed at times of the year when germination and success is highest. • Conduct stormwater inspections and document regrowth of vegetation on disturbed areas. • Sample and test surface water and drinking water from select sites (as required by state and local requirements) for comparison to baseline water quality conditions.
9	Final Reclamation	• Whenever practicable, complete final reclamation activities so that seeding occurs during the first optimal season following plugging and abandonment of wells and closure of facilities. • Remediate spills on disturbed areas prior to reclamation. • Remove and properly dispose of degraded or unneeded silt fencing and erosion control materials in a timely fashion. • Remove unneeded fencing (and cattle guards) on project sites. Replace degraded or hazardous fencing as needed. • Remove and properly dispose of pit contents at an approved disposal facility. Dispose of or recycle pit liners at approved facilities. • When necessary, fence livestock and wildlife out of newly reclaimed areas until reclamation standards have been met and plants are capable of sustaining grazing and trampling. • Monitor reclamation efforts as needed and make corrections when necessary.
10	CPW-Wildlife - Minimization-Deer and Elk	The operator agrees to preclude new oil and gas operations within CPW-identified mule deer critical winter range and elk winter concentration areas.
11	CPW-Wildlife - Minimization-Deer and Elk	The operator agrees to preclude the use of aggressive CPW-identified non-native grasses and shrubs in mule deer and elk habitat restoration.
12	CPW-Wildlife - Minimization-Deer and Elk	The operator agrees to preclude new oil and gas operations within CPW-identified elk production areas.

Total: 12 comment(s)

Attachment Check List

Att Doc Num	Name
401650784	FORM 2A SUBMITTED

Total Attach: 1 Files

General Comments

User Group	Comment	Comment Date
Permit	Final review complete.	07/04/2018
OGLA	06/10/2018 - location does not fall within 'Sensitive Wildlife Habitat' (SWH) or 'Restricted Surface Ocupancy' (RSO) areas, therefore no CPW Wildlife Consultation is required; BLM and FS COAs and lease stipulations will be acceptable; 06/27/2018 – initiated / completed OGLA Form 2A review by Dave Kubeczko; previously submitted and approved (02-15-12 and 08-24-15) Form 2As #400251597 and 400818364 Conditions of Approval (COAs) will apply – notification, posting Form 2A, and applicable 2s and 4s, fluid containment, spill/release BMPs, construction stormwater / erosion controls, flowback to tanks, emission and odor control, exposed slope stabilization, cuttings low moisture content, sediment and dust control access road and pad, and pipeline testing; 07/02/2018 - passed OGLA Form 2A review by Dave Kubeczko; notification, posting Form 2A, and applicable 2s and 4s, fluid containment, spill/release BMPs, construction stormwater / erosion controls, flowback to tanks, emission and odor control, exposed slope stabilization, cuttings low moisture content, sediment and dust control access road and pad, and pipeline testing COAs.	06/27/2018
Permit	Preliminary review complete.	06/26/2018
Permit	Form passes completeness.	06/08/2018

Total: 4 comment(s)