

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



Document Number:

401641898

Date Received:

08/21/2018

Oil and Gas Location Assessment

☐ New Location ☐ Refile ☒ Amend Existing Location Location#: 312083

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:

312083

Expiration Date:

10/25/2021

☒ 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: 10000
Name: BP AMERICA PRODUCTION COMPANY
Address: 380 AIRPORT RD
City: DURANGO State: CO Zip: 81303

Contact Information

Name: Naomi Azulai
Phone: (970) 2321439
Fax: ()
email: naomi.azulai@bpx.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20010158 ☐ Gas Facility Surety ID (Rule 711): _____

☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: TIFFANY Number: 5
County: LA PLATA
QuarterQuarter: SWSE Section: 20 Township: 33N Range: 6W Meridian: N Ground Elevation: 6626
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: 883 feet FSL from North or South section line
1679 feet FEL from East or West section line
Latitude: 37.084597 Longitude: -107.520519
PDOP Reading: 6.0 Date of Measurement: 07/26/2018
Instrument Operator's Name: ROBERT HINAJOSA

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	<u>2</u>	Oil Tanks*	<u> </u>	Condensate Tanks*	<u> </u>	Water Tanks*	<u>7</u>	Buried Produced Water Vaults*	<u> </u>
Drilling Pits	<u> </u>	Production Pits*	<u> </u>	Special Purpose Pits	<u> </u>	Multi-Well Pits*	<u> </u>	Modular Large Volume Tanks	<u> </u>
Pump Jacks	<u>2</u>	Separators*	<u>2</u>	Injection Pumps*	<u> </u>	Cavity Pumps*	<u> </u>	Gas Compressors*	<u>1</u>
Gas or Diesel Motors*	<u>2</u>	Electric Motors	<u>1</u>	Electric Generators*	<u>1</u>	Fuel Tanks*	<u> </u>	LACT Unit*	<u> </u>
Dehydrator Units*	<u>1</u>	Vapor Recovery Unit*	<u> </u>	VOC Combustor*	<u> </u>	Flare*	<u> </u>	Pigging Station*	<u>1</u>

OTHER FACILITIES*

Other Facility Type

Number

Solar Kit	<u>1</u>
Electrical Panel	<u>1</u>
Water Transfer Skid	<u>1</u>
Chemical Injection Skid	<u>2</u>

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:

4" steel and 2" steel flowlines from wellheads to separators to produced water tanks. 8" steel pipeline to compression. 6" steel pipeline to dehydrators. 6" steel pipeline to gathering system.

CONSTRUCTION

Date planned to commence construction: 01/01/2019 Size of disturbed area during construction in acres: 3.53
Estimated date that interim reclamation will begin: 07/01/2019 Size of location after interim reclamation in acres: 2.83
Estimated post-construction ground elevation: 6626

DRILLING PROGRAM

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

Is H₂S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? Yes

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE

Drilling Fluids Disposal Method: Recycle/reuse

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: Robert Troy Hott

Phone: 970-749-5968

Address: 6675 ST HWY 151

Fax:

Address:

Email:

City: Ignacio State: CO Zip: 81137

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: oil and gas lease

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:	1393 Feet	1465 Feet
Building Unit:	1437 Feet	1506 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	376 Feet	77 Feet
Above Ground Utility:	2650 Feet	2630 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	274 Feet	137 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 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.

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: 82. Zyme-Rock outcrop complex 12 to 65 percent slopes

NRCS Map Unit Name: 63. Sili clay loam 3 to 6 percent slopes

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: 09/07/2018

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: 93 Feet

water well: 1625 Feet

Estimated depth to ground water at Oil and Gas Location 14 Feet

Basis for depth to groundwater and sensitive area determination:

Sensitive area determination based on shallow ground water at the Oil and Gas Location. The depth to groundwater is based on the nearest well; HOTT BOB - permit # 196346, 1625 feet to the SW with SWL of 14' bgs.

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 No

zone:

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: This existing oil and gas location is being amended to accomodate two (2) additional wells that will be requiring a pad expansion and additional equipment.

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

Signed: _____ Date: 08/21/2018 Email: naomi.azulai@bpx.com

Print Name: Naomi Azulai Title: Well Permitting 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: 10/26/2018

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
	<p>Construction: The following COAs will apply:</p> <p>COA 76 - Strategically apply fugitive dust control measures to access roads and well pad to reduce fugitive dust and coating of vegetation and deposition in water sources. Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of 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.</p> <p>COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel [or equivalent] with an impervious liner) to contain any spilled or released material around permanent produced water storage tanks.</p>
	<p>Drilling / Completions: The following COAs will apply:</p> <p>COA 11 - A closed loop system must be implemented during drilling (as indicated on the Form 2s and Form 2A). The moisture content of all drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts.</p> <p>COA 12 - All cuttings generated during drilling with salt-based mud (SBM) must be segregated from water/bentonite based mud-(WBM-) generated drill cuttings and placed separately on the well pad. All SBM-generated drill cuttings must be kept in tanks/containers, or placed on a lined/bermed portion of the well pad; prior to disposition. The operator has indicated that 'Cuttings Disposal' will be "OFFSITE" and that the 'Cuttings Disposal Method' will be "COMMERCIAL DISPOSAL" (as shown in the 'DRILLING WASTE MANAGEMENT PROGRAM SECTION' of the Form 2A). All liners associated with salt based drilling mud and SBM-generated drill cuttings must be disposed of offsite per CDPHE rules and regulations.</p> <p>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 into tanker trucks for offsite disposal. No open top tanks can be used for flowback fluids containment. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.</p>
	<p>Emissions Mitigation: The following COA will apply:</p> <p>COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.</p>
	<p>Material Handling and Spill Prevention: The following COA will apply:</p> <p>COA 45 - All onsite flowlines and offsite pipelines will be constructed, maintained, registered, and integrity tested in accordance with the new COGCC 1100 Series Rules (1101, 1102, 1103, and 1104) updated on May 1, 2018. All onsite flowlines from wellhead to separators to tanks, offsite flowlines / pipelines from tanks and separators, and any temporary surface lines used for hydraulic stimulation and/or flowback operations will be pressure tested in accordance with the new COGCC 1100 Series Rules. These tests shall be performed prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network, and tested annually, regardless of operating pressures.</p>

Best Management Practices

No	BMP/COA Type	Description
1	Wildlife	Covered in the San Juan Basin Wildlife Mitigation Plan (WMP) dated March 2011 with an extension dated May 2017.
2	Storm Water/Erosion Control	Covered in the Field Wide Storm Water managment Plan. Site speicific SWMPs have been developed for this location including sediment control logs and rock rundowns. See attached Construction and Reclamation SWMP drawings for details.
3	Interim Reclamation	All of the disturbed areas not used for routine operations will be reclaimed. This will include re-contouring slopes to 3:1 or greater and seeding/mulching. The seed will be drilled or broadcasted where machinery cannot access. Straw mulch will be spread and crimped over the seeded areas to retain moisture and limit erosion. Weeds will be inspected and treated annually, when necessary, by a certified weed control contractor.

Total: 3 comment(s)

Attachment Check List

Att Doc Num	Name
401641898	FORM 2A SUBMITTED
401738536	NRCS MAP UNIT DESC
401738540	NRCS MAP UNIT DESC
401738543	CONST. LAYOUT DRAWINGS
401738544	CONST. LAYOUT DRAWINGS
401738545	LOCATION PICTURES
401738552	MULTI-WELL PLAN
401738556	ACCESS ROAD MAP
401738557	PROPOSED BMPS
401738586	PROPOSED BMPS
401738610	REFERENCE AREA MAP
401738622	SURFACE AGRMT/SURETY
401739259	LOCATION DRAWING
401739261	HYDROLOGY MAP
401739882	REFERENCE AREA PICTURES

Total Attach: 15 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Final Review Completed.	10/23/2018
OGLA	08/31/2018 - passed by CPW with location being incorporated into the March 2011 (renewed May 2017, and extended until 2023) Wildlife Mitigation Plan; 09/07/2018 - location originally onsited by Forest Service and operator; 10/03/2018 - initiated / completed OGLA Form 2A review by Dave Kubeczko; placed dust control access road and pad, cuttings containment and management, odor control, tank berming, flowback to tanks only, and pipeline / flowline COAs on the Form 2A; 10/03/2018 - passed OGLA Form 2A review by Dave Kubeczko with dust control access road and pad, cuttings containment and management, odor control, tank berming, flowback to tanks only, and pipeline / flowline COAs. 10/11/2018 - revised the number of Wells from 4 to 2, the number of Separators from 4 to 2, the number of Pump Jacks from 3 to 2, the number of Gas or Diesel Motors from 3 to 2, the number of Chemical Injection Skids from 4 to 2 per discussion with operator;	10/03/2018
DOW	The Operator has agreed to incorporate this well into BPs existing San Juan Basin Colorado Wildlife Mitigation Plan (dated March 2011, renewed 5/2017 and extended until 2023). The well is subject to the BMPs specified in the Plan, including pre-construction biological surveys, compliance with raptor nest guidelines, and screening of planned day rig activity for conflicts with known eagle nests and roosts prior to commencing rig work. In addition, any new surface disturbance associated with this well pad, access road, and gathering pipeline will be incorporated into Tables 1 and 2 of the Plan and mitigated off-site per the standards identified in the plan.	08/31/2018
Permit	Passed Completeness.	08/23/2018

Total: 4 comment(s)