

FORM  
2A

Rev  
08/13

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:

401331839

Date Received:

09/25/2017

Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: \_\_\_\_\_

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:

**460107**

Expiration Date:

**12/19/2021**

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: 10110  
 Name: GREAT WESTERN OPERATING COMPANY LLC  
 Address: 1001 17TH STREET #2000  
 City: DENVER    State: CO    Zip: 80202

Contact Information

Name: Miracle Pfister  
 Phone: (303) 398-0550  
 Fax: ( )  
 email: regulatorypermitting@gwogco.com

RECLAMATION FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID: 20160041     Gas Facility Surety ID: \_\_\_\_\_
- Waste Management Surety ID: \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Brant LD Pad    Number: \_\_\_\_\_  
 County: ADAMS  
 Quarter: SENE    Section: 11    Township: 1S    Range: 67W    Meridian: 6    Ground Elevation: 4972

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: 2315 feet FNL from North or South section line  
341 feet FEL from East or West section line

Latitude: 39.980453    Longitude: -104.847958

PDOP Reading: 1.5    Date of Measurement: 02/02/2017

Instrument Operator's Name: Chad Meiers



## 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? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

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

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Wayne & Patricia Medlin Phone: \_\_\_\_\_

Address: 15655 Fax: \_\_\_\_\_

Address: Riverdale Road Email: \_\_\_\_\_

City: Brighton State: CO Zip: 80601

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 01/30/2014

## 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:                         | 507 Feet  | 515 Feet                 |
| Building Unit:                    | 662 Feet  | 546 Feet                 |
| High Occupancy Building Unit:     | 4399 Feet | 4307 Feet                |
| Designated Outside Activity Area: | 5280 Feet | 5280 Feet                |
| Public Road:                      | 201 Feet  | 238 Feet                 |
| Above Ground Utility:             | 686 Feet  | 927 Feet                 |
| Railroad:                         | 5280 Feet | 5280 Feet                |
| Property Line:                    | 189 Feet  | 123 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

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: 06/07/2017

- 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.

## 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.

Five (5) separate parcels make up the Medlin property, 3 of which are located within the floodplain and 2 of which are located outside of the floodplain. The largest parcel is where we are locating the pad as it is the only one large enough to accommodate our operations and also places the pad farthest away from the surrounding neighbors, and puts the surface owners residence the closest building unit to the pad. Although a more western location is possible via a different land owner, it would put the pad in a more densely populated residential area. Southern movement of the Location is restricted by quarry operations. Moving the Location further to the east would place the pad in the groundwater sampling or exception zones of the Brighton PWS. If the pad location was to be switched with the BHL the new pad would be placed in a LUMA in the middle of the City of Brighton.

## 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: Nunn Clay loam, 1 to 3 percent 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: \_\_\_\_\_

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: 6 Feet

water well: 108 Feet

Estimated depth to ground water at Oil and Gas Location 12 Feet

Basis for depth to groundwater and sensitive area determination:

Receipt: 9003353  
Permit#: 31172- -

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 318A

## 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 Brant LE 08-199HC was chosen as the reference well.

The manufacturer of the MLVT is Brewer Steel Company. The size is 60K BBL. The estimated length of time the MLVT will be onsite is three weeks. The MLVT are depicted on the Construction Layout Drawing.

The attached SUA was executed by Extraction and now belongs to Great Western. An additional map has been attached labeled as "other" to further describe the location stated in the SUA.

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).

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

Signed: \_\_\_\_\_ Date: 09/25/2017 Email: cng@gwogco.com

Print Name: Christi Ng Title: Sr. 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: 12/20/2018

**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**

|  |   |
|--|---|
|  | Operator shall post the Form 2A on Location during all construction, drilling and completions operations. |
|--|---|

**Best Management Practices****No BMP/COA Type****Description**

|   |          |  |
|---|----------|--|
| 1 | Planning | Multi-well Pads - Rule 604.c.(2)E.<br>This is a multi-well pad. GWOC utilizes multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. The pad has all weather access roads to allow for operator and emergency response.   |
| 2 | Planning | Berm Construction - Rule 604.c.(2)G.<br>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.<br><br>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. |
| 3 | Planning | Fencing requirements - Rule 604.c.(2)M<br>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 layout diagrams for both drilling/completion and the production phases of operations.  |

|    |                             |  |
|----|-----------------------------|--|
| 4  | Planning                    | Control of Fire Hazards - Rule 604.c.(2)N<br>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.   |
| 5  | Planning                    | Load lines - Rule 604.c.(2)O<br>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.   |
| 6  | Planning                    | Identification of P&A wells - Rule 604.c.(2)U<br>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.  |
| 7  | Planning                    | Development from existing well pads - Rule 604.c.(2)V<br>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 practical 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, wellbore reaches, setback requirements, etc.   |
| 8  | Traffic control             | Traffic Plan - Rule 604.c.(2)D.<br>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.  |
| 9  | General Housekeeping        | General Housekeeping:<br>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. |
| 10 | General Housekeeping        | Removal of Surface Trash - Rule 604.c.(2)P<br>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.  |
| 11 | Storm Water/Erosion Control | Storm Water Management Plans (SWMP)<br>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.   |

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|----|--|--|
| 12 | Material Handling and Spill Prevention | MLVT Certification Statement:<br>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.   |
| 13 | Material Handling and Spill Prevention | Material Handling and Spill Prevention<br>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.<br>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.  |
| 14 | Material Handling and Spill Prevention | Leak Detection Plan - Rule 604.c.(2)F.<br>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. |
| 15 | Material Handling and Spill Prevention | Pit level indicators - Rule 604.c.(2)K<br>GWOC does not typically utilize pits in any of its operations. No pits will be used for this facility.   |
| 16 | Material Handling and Spill Prevention | Tank specifications - Rule 604.c.(2)R<br>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.   |
| 17 | Dust control                           | Dust Control<br>Dust control measures may include surface stabilization, or dust control with appropriate chemical or later applications.  |
| 18 | Construction                           | Access Roads - Rule 604.c.(2)S<br>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.  |
| 19 | Construction                           | Well site cleared - Rule 604.c.(2)T<br>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.  |

|    |                                |   |
|----|--------------------------------|---|
| 20 | Noise mitigation               | <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, where applicable. 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. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.</p>  |
| 21 | Noise mitigation               | <p>Noise - Rule 604.c.(2)A.<br/>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. 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>  |
| 22 | Odor mitigation                | <p>Odors Mitigation:<br/>When practical, 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 use an invert based drilling fluid with diesel or a similar fluid for the base oil. If odor complaints are received and it is determined that they are caused by the invert drilling fluid, then Benzaco Scientific's Odor Armor odor neutralizing agent or similar product will be added to the mud system to eliminate the odor. This product and other similar products have been used by other operators in the DJ Basin and have been successful in eliminating odor attributed to invert drilling fluids.</p>  |
| 23 | Drilling/Completion Operations | <p>Guy line anchors - Rule 604.c.(2)Q<br/>Guy line anchors left buried for future use shall be identified by a brightly colored marker at least 4-feet in height and within 1-foot to the east of the anchor.</p>   |
| 24 | Drilling/Completion Operations | <p>Green Completions (Rule 604.c.(2)C).<br/>As applicable, per COGCC Rule 805, GWOC will utilize all reasonable and costefficient best practices, including but not limited to those listed in Rule 805, to maximize resource recovery and mitigate releases to the environment. • Initial frac and drillout 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 highpressure separator and closed-top tanks to minimize emissions to the environment. Hydrocarbon liquids, produced water, and sand are separated utilizing the highpressure separator. • The quality (combustibility) of the gas is typically monitored directly at the highpressure 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 or a from 42 for flaring will be submitted for approval. • 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.</p> |

|    |                                |  |
|----|--------------------------------|--|
| 25 | Drilling/Completion Operations | <p>Operator shall comply with the following requirements of Order 1-189: Brighton PWS Buffer Zone.</p> <p>(1) Pitless drilling systems;</p> <p>(2) Flowback and stimulation fluids shall be contained within tanks that are placed on a well pad or in an area with downgradient perimeter berming;</p> <p>(3) Berms or other containment devices shall be constructed around crude oil, condensate, and produced water storage tanks as follows:</p> <p>a. Secondary containment shall be sized to contain a minimum of 150% of the volume of the largest primary containment vessel within the secondary containment area.</p> <p>b. Containment berms shall be constructed of steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation.</p> <p>c. Secondary containment areas for tanks shall be constructed with a synthetic or engineered liner that contains all primary containment vessels and flowlines and is mechanically connected to the steel ring to prevent leakage.</p> <p>d. Tertiary containment, such as an earthen site berm, is required around the downgradient and side-gradient portions of Production Facilities, including process vessels.</p> <p>(4) Production Facilities will be installed with automated fluid level monitoring, capable of alerting the Operator if a sudden change in fluid level or upset condition occurs. Additionally, wells will be equipped with remote shut-in capability.</p> <p>(5) All loadlines shall be bullplugged or capped.</p> <p>(6) Notification to the Brighton Public Works Department prior to commencement of new surface disturbing activities at the site; and</p> <p>(7) An emergency spill response program that includes employee training, safety, and maintenance provisions and current contact information for Brighton. The emergency response plan shall specify when notifications to Brighton shall be made and must be prepared in consultation with Brighton.</p> <p>In the event of a spill or release, the Operator shall immediately implement the emergency response procedures in the above-described emergency response program.</p> <p>If a spill or release results in significant adverse impacts or threatens such impacts to a portion of the Brighton PWS, the Operator shall notify Brighton immediately following discovery of the release in addition to reporting in accordance with Rule 906.b.</p> |
|----|--------------------------------|--|

Total: 25 comment(s)

## Attachment Check List

| <u>Att Doc Num</u> | <u>Name</u>                                |
|--------------------|--|
| 1010370            | RULE 306.E CERTIFICATION LETTER            |
| 1010440            | NRCS MAP UNIT DESC                         |
| 401331839          | FORM 2A SUBMITTED                          |
| 401334596          | MULTI-WELL PLAN                            |
| 401334610          | LOCATION DRAWING                           |
| 401334612          | FACILITY LAYOUT DRAWING                    |
| 401334624          | ACCESS ROAD MAP                            |
| 401334626          | HYDROLOGY MAP                              |
| 401334652          | LOCATION PICTURES                          |
| 401346059          | PRE-APPLICATION NOTIFICATION CERTIFICATION |
| 401350522          | OTHER                                      |
| 401434990          | WASTE MANAGEMENT PLAN                      |
| 401434992          | SURFACE AGRMT/SURETY                       |
| 401434997          | CONST. LAYOUT DRAWINGS                     |

Total Attach: 14 Files

## General Comments

| <u>User Group</u> | <u>Comment</u>  | <u>Comment Date</u> |
|-------------------|---|---------------------|
| Permit            | Final review complete.  | 12/18/2018          |
| Permit            | Permitting review complete.   | 11/20/2018          |
| OGLA              | Per Operator Concurrence, added the Brighton PWS Order 1-189 BMP to the Operator BMP List.<br><br>Per Operator request, updated the Estimated Construction and Interim Reclamation Dates. Operator intends to drill 10 wells per year through continuous operations.  | 08/29/2018          |
| OGLA              | Per Operator request, revised the Siting Rationale to the following.<br><br>"Five (5) separate parcels make up the Medlin property, 3 of which are located within the floodplain and 2 of which are located outside of the floodplain. The largest parcel is where we are locating the pad as it is the only one large enough to accommodate our operations and also places the pad farthest away from the surrounding neighbors, and puts the surface owners residence the closest building unit to the pad. Although a more western location is possible via a different land owner, it would put the pad in a more densely populated residential area. Southern movement of the Location is restricted by quarry operations. Moving the Location further to the east would place the pad in the groundwater sampling or exception zones of the Brighton PWS. If the pad location was to be switched with the BHL the new pad would be placed in a LUMA in the middle of the City of Brighton."   | 01/05/2018          |
| OGLA              | Siting Rationale needs to be stronger.<br>- Working with Operator on Siting Rationale - 01/04/2018<br>Changed the distance to the nearest Building Unit to 662 based on the distance reported on APD Document #401331371.<br>Which well is 4399 feet from a HOBU?<br>- The HOBU (home child care facility) was identified during the initial survey of the Location and was located 4399 feet from Well Head 08-399HNX. The facility is no longer showing as licensed and mapped on the COGIS Map overlay, however, based on the initial survey, the distance provided on the Form 2A will not be changed. - 07/09/2018<br>Cultural Distances subject to change. - 06/12/2018<br>- Cultural Distances are correct. - 06/18/2018<br>NRCS MAP UNIT DESC ATTACHMENT is incorrect.<br>- Uploaded correct description<br>Moved the following from the stormwater BMP to the Submit Tab:<br>"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)."<br><br>Location lies within the Buffer Zone of the PWS. | 11/14/2017          |
| Permit            | Passed completeness.  | 10/20/2017          |
| OGLA              | Passed Buffer Zone completeness review.   | 10/20/2017          |
| Permit            | Completeness review - recommend return to draft pending OGLA review:<br>- Request Operator redact royalty payment information described on attached SUA.<br>- Construction layout drawing is missing required cross-sectional diagrams.<br>- Missing waste management plan.<br>- Missing 306.e Certification.<br>- Related Forms have document numbers that have since been withdrawn; required updating.   | 09/28/2017          |
| Permit            | Referred to OGLA Supervisor for buffer zone review.   | 09/26/2017          |

Total: 9 comment(s)

