

FORM
2A

Rev
08/19

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:

402141580

(REJECTED)

Date Received:

08/17/2019

Oil and Gas Location Assessment

New Location Refile Amend Existing Location Location#: 462024

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:

462024

Expiration Date:

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: 10071
Name: HIGHPOINT OPERATING CORPORATION
Address: 555 17TH ST STE 3700
City: DENVER State: CO Zip: 80202

Contact Information

Name: Matt Barber
Phone: (303) 312-8188
Fax: ()
email: mbarber@hpres.com

FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): 20040060 Gas Facility Surety ID (Rule 711): _____
- Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: Grinde Number: 1-64-5_4 NWSW
County: WELD
Quarter: NWSW Section: 5 Township: 1N Range: 64W Meridian: 6 Ground Elevation: 5025

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: 1550 feet FSL from North or South section line
290 feet FWL from East or West section line

Latitude: 40.077500 Longitude: -104.583220
PDOP Reading: 1.3 Date of Measurement: 11/02/2017

Instrument Operator's Name: Scott Estabrooks

LOCAL GOVERNMENT INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this COGCC application? If the local government has waived its right to precede the COGCC in siting determination, indicate by selecting "NO" here and selecting "Waived" below. Yes No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location.

The local government siting permit type is: WOGLA

The local government siting permit was filed on: 03/01/2019

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

Local Government disposition - WOGLA approved on 4/8/2019

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 #
Well Site is served by Production Facilities	462025	

FACILITIES

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

Wells	<u>6</u>	Oil Tanks*	<u> </u>	Condensate Tanks*	<u> </u>	Water Tanks*	<u> </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>6</u>	Separators*	<u> </u>	Injection Pumps*	<u> </u>	Cavity Pumps*	<u> </u>	Gas Compressors*	<u> </u>
Gas or Diesel Motors*	<u> </u>	Electric Motors	<u> </u>	Electric Generators*	<u> </u>	Fuel Tanks*	<u> </u>	LACT Unit*	<u> </u>
Dehydrator Units*	<u> </u>	Vapor Recovery Unit*	<u> </u>	VOC Combustor*	<u> </u>	Flare*	<u> </u>	Pigging Station*	<u> </u>

OTHER FACILITIES*

Other Facility Type	Number
<u> </u>	<u> </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:

- (1) 4" Poly Flex Pipe - Water Flowline
- (1) 6" Steel Gas Line - Externally coated and cathodic protected
- (1) 4" Poly Flex Pipe - Oil Line
- (6) 2" Poly Flex Pipe - Gas Lines
- (6) 2" Steel Flow Lines - Externally coated and cathodic protected
- (1) 2" Poly Flex Pipe Swab

See pipeline and flowline counts above. When possible temporary water pipelines will carry water from storage tanks or water sources to well completion sites. Pipes will be made of flexible and rigid materials (poly and steel) generally 2" to 12" in diameter. The length will be determined by the distance to the well site to be serviced for the fracing operation. This will greatly minimize the number of truck trips required for the well completion.

CONSTRUCTION

Date planned to commence construction: 09/25/2019 Size of disturbed area during construction in acres: 6.70
Estimated date that interim reclamation will begin: 03/01/2020 Size of location after interim reclamation in acres: 0.80
Estimated post-construction ground elevation: 5029

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? No

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Land application

Cutting Disposal: OFFSITE Cuttings Disposal Method: Beneficial reuse

Other Disposal Description:

Beneficial reuse or land application plan submitted? Yes

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: 454282

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: B&B Family Trust

Phone: _____

Address: 5322 WCR 51

Fax: _____

Address: _____

Email: _____

City: Keenesburg State: CO Zip: 80643

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 10/31/2017

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s): _____

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:	399 Feet	_____ Feet
Building Unit:	675 Feet	_____ Feet
High Occupancy Building Unit:	5280 Feet	_____ Feet
Designated Outside Activity Area:	5280 Feet	_____ Feet
Public Road:	277 Feet	_____ Feet
Above Ground Utility:	264 Feet	_____ Feet
Railroad:	5280 Feet	_____ Feet
Property Line:	290 Feet	_____ Feet
School Facility::	5280 Feet	_____ Feet
School Property Line:	5280 Feet	_____ Feet
Child Care Center:	580 Feet	_____ 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, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)? Yes No

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: 11/13/2017

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 (onl 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: 79—Weld 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: 113 Feet

water well: 310 Feet

Estimated depth to ground water at Oil and Gas Location 340 Feet

Basis for depth to groundwater and sensitive area determination:

Please see the attached Sensitive area determination report. Please see the attached Sensitive area determination report.
Water well drill depth is from CO Division of Water Resources Permit Number 159679

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 _____

Operator Proposed Wildlife BMPs

No BMP

CPW 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 HighPoint is submitting this amended Form 2A to add two newl proposed wells, as well as to update the current approved location with SB19-181 BMP standards. Attached is HighPoint's SB19-181 Objective Criteria & Public Health, Safety, Welfare, and the Environment.

For COGCC review and consideration, for this amended Form 2A and two new Form 2's, the drill rig commencement date is December 2, 2019.

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

Signed: _____ Date: 08/17/2019 Email: mbarber@hpres.com

Print Name: Matt Barber Title: Regulatory

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

COGCC Approved: _____ Director of COGCC Date: _____

Conditions Of Approval

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

COA Type	Description
Rejected	<p>This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is rejecting this application consistent with the Rejection Process – Form 2 and 2A (May 21, 2019) posted in the Form 2 and Form 2A Instructions section of our website. In compliance with § 24-65.1-108(1), C.R.S., the COGCC is returning this application to the applicant to remedy the deficiencies. The applicant may resubmit this application for COGCC review; upon determination of completeness for any resubmitted application, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review.</p> <p>In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary prior to determination of completeness:</p> <ol style="list-style-type: none"> 1. A pre-application certification under Rule 305.a.(2). The last pre-application letter was sent in 2017. New notifications are required prior to re-submitting. 2. The Waste Management Plan does not match the Waste section of the 2A. 3. Data field under Cultural Distances for child care facility is incorrect 4. Distance to surface water on the 2A does not match the hydrology map 5. The depth to groundwater does not take into account a monitoring well nearby 6. Under the BMP Section: <ol style="list-style-type: none"> a. BMP #2 relates to production facilities and this is a well only location b. BMP #5 is ambiguous on the fencing c. BMP #7 is ambiguous for the site inspections and documentation d. BMP #8 and #13 both relate to temporary tank containment, only one is necessary e. BMP #9 does not provide site specific stormwater or erosion controls f. BMP #10 references pigging stations that are not listed under the facilities portion of the 2A. g. BMP #12 describes flowback and stimulation fluids. BMP #13 describes temporary tanks. There is not information on the 2A regarding temporary tanks or timing of post completions flowback. h. BMP #15 and #17 both reference fire hazards and only one of the BMPs is necessary i. BMP #18 is ambiguous for when water trucks will be used. j. BMP #19 is under the category of noise, but is a dust BMP k. An Odor BMP for flowback tanks and drilling fluids and cuttings is not provided.

Best Management Practices

No	<u>BMP/COA Type</u>	<u>Description</u>
1	Planning	<p>604.c (2).E. To reduce footprint, the pad is planned as a multiwell pad. The pad will have all-weather access and noise mitigation measures (sound walls) will be installed and removed without disturbing landscape.</p>
		<p>There are no existing pads to reoccupy within the S/2 Sec 5 & 4, T1N, R64W DSU. A new multi-well location is proposed to drill all wells within the southern portion DSU, to optimize full development.</p>
2	Planning	<p>Where technologically feasible and economically practicable, multi-well pads have been created. Multi-well production facilities has been located as far as possible from Building Units. The pad will have an all weather access road, which allows for emergency responses.</p>
3	Traffic control	<p>COGCC Rule 604.c.(2)S.: Access Roads The Weld County access road permit has been approved for this location. The access will be properly constructed to accommodate emergency vehicle access. In addition, the access road and all leasehold roads have been/will be maintained to accommodate local emergency vehicle access requirements.</p>
4	General Housekeeping	<p>COGCC Rule 604.c.(2)P: Trash will be contained in a trash cage or dumpster and hauled away to a commercial disposal facility.</p>

5	General Housekeeping	604c.(2).M. Fencing Requirements: A permeant fencing plan will be reviewed by the surface owner and HighPoint to ensure the well site is secured. HighPoint will construct, maintain, and monitor the fence (if constructed) upon completion of the wells.
6	Storm Water/Erosion Control	Site-specific best management practices will be implemented in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the canal located southwest of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.
7	Material Handling and Spill Prevention	During construction, drilling, and completion activities, site inspections will be documented for spill and storm water BMPs.
8	Material Handling and Spill Prevention	During drilling and completion activities, a portable or temporary liner shall be placed beneath equipment to protect water resources.
9	Material Handling and Spill Prevention	Site shall be graded to prevent accumulation of storm water; runoff shall be controlled with BMPs designed and implemented in accordance with good engineering practices to prevent contaminants or sediments from being transported off location.
10	Material Handling and Spill Prevention	Pigging stations shall have catchments for containing any spilled fluids. Accumulated E&P waste shall be removed immediately upon completion of pigging operations.
11	Material Handling and Spill Prevention	Drip pans or liners shall be used during equipment refueling and maintenance.
12	Material Handling and Spill Prevention	Flowback and stimulation fluids from the wells being completed will be sent to tanks and/or filters to allow sand and sediment to settle out before the fluids are hauled to a state-approved disposal facility.
13	Material Handling and Spill Prevention	All temporary tanks and frac tanks will have secondary containment constructed from impervious material with an engineered liner to prevent the migration of production fluids into the underlying soils and groundwater.
14	Material Handling and Spill Prevention	*Pressure testing of flowlines will be completed every six (6) months to operating pressure. *If a flowline pressure test fails, the flowline(s) will be immediately isolated and blowdown. Spill reporting procedure and reporting to COGCC upon discovery of flowline spill. The line will be repaired and area will be remediated and reclaimed immediately.
15	Material Handling and Spill Prevention	COGCC Rule 604.c.(2)N.: Control of Fire Hazards Materials not in use will be kept a minimum of 25' from wellhead and separator. All electrical installations will be done in accordance with current NEC and API RP 500.
16	Material Handling and Spill Prevention	604c.(2).O. Load lines: All load lines shall be bull plugged or capped.
17	Material Handling and Spill Prevention	Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, equivalent safety measures should be taken. Control of fire hazards. Any material not in use that might constitute a fire hazard will be removed at a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area will comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado.
18	Dust control	Dust suppression (water trucks) will be utilized as necessary.
19	Noise mitigation	HighPoint will implement dust abatement measures to prevent fugitive dust from vehicular traffic, equipment operations, or wind.
20	Noise mitigation	Prior to drilling and completions operations, sound/visual walls will be constructed along the western and southern edges of the pad to mitigate noise and light impacts to nearby occupied structures. The walls will be constructed on the edge of the pad and removed after completion operations are finished.

21	Noise mitigation	To reduce noise impacts associated with production of the wells, compression and associated production equipment has been purposely located off site at the Grinde 1-64-5_4 PF pad (Document Number: 401485334) to be outside of the 1000' buffer.
22	Emissions mitigation	Green Completions – Test separators and associated flow lines, sand traps, and emission control systems shall be installed on-site to accommodate green completion techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, the operator shall not produce the well without an approved variance per Rule 805.b.(3)C.
23	Odor mitigation	Sealed tanks with pressure relief valves and emission controls will be utilized during flowback and production.
24	Drilling/Completion Operations	With the exception of derrick lights, light sources will be directed downwards and away from occupied structures. Upon rigging up, operator will engage building unit owner about lighting sources. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.
25	Drilling/Completion Operations	No guy line anchors will be utilized. Base beams are utilized during work overs and are removed after rig is gone.

Total: 25 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402141580	FORM 2A SUBMITTED
402141827	MULTI-WELL PLAN
402141828	FACILITY LAYOUT DRAWING
402141830	LOCATION PICTURES
402141831	ACCESS ROAD MAP
402141832	LOCATION DRAWING
402141835	NRCS MAP UNIT DESC
402141839	SURFACE AGRMT/SURETY
402141840	MINERAL LEASE MAP
402141854	WASTE MANAGEMENT PLAN
402147957	OTHER
402147959	HYDROLOGY MAP
402147960	OTHER

Total Attach: 13 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Waste management plan does not match the E&P waste facility listed on the 2A. Distance to Childcare is listed at 580 feet - email for actual distance, Hydrology map does not show closest point of the location to the ditch at approximately 50 feet from the edge of disturbance, depth to water listed is from domestic wells - potential shallow groundwater at 18 feet, request clarification on BMPs for dust control, noise, production BMPs when its a well only location, confirmation on fencing.	09/26/2019
Permit	Multi-well plan has been reviewed and is consistent with the submitted APDs and the approved DSU. Permitting task has been passed.	09/24/2019
Permit	Passed Completeness.	08/19/2019
Permit	Referred to OGLA supervisor for buffer zone review.	08/19/2019

Total: 4 comment(s)

Public Comments

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

REJECTED