

State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

402007793

Date Received:

07/22/2019

## 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:

**470393**

Expiration Date:

**12/26/2022**☒ 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: 81490

Name: ST CROIX OPERATING INC

Address: P O BOX 13799

City: DENVER State: CO Zip: 80201

## Contact Information

Name: ANDY PETERSON

Phone: (970) 203-4263

Fax: ( )

email: andy@petersonenergyoperating.com

## FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20000108 ☐ Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- ☐ Waste Management Surety ID (Rule 704): \_\_\_\_\_

## LOCATION IDENTIFICATION

Name: HIGH PLAINS Number: 1

County: WASHINGTON

QuarterQuarter: NWNE Section: 22 Township: 3S Range: 53W Meridian: 6 Ground Elevation: 4959

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: 1100 feet FNL from North or South section line

1700 feet FEL from East or West section line

Latitude: 39.780640 Longitude: -103.299030

PDOP Reading: 1.6 Date of Measurement: 04/06/2019

Instrument Operator's Name: CRAIG BURKE

## LOCAL GOVERNMENT INFORMATION

County: WASHINGTON 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 location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition 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: \_\_\_\_\_

The local government siting permit was filed on: \_\_\_\_\_

The disposition of the application filed with the local government is: \_\_\_\_\_

Additional explanation of local process:

Washington County does not have siting regulations.

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

## OTHER FACILITIES\*

Other Facility Type	Number
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GUNBARREL	1
HEATER TREATER	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:

Well head to tanks will have a 3 inch buried pipe.

## CONSTRUCTION

Date planned to commence construction: 12/30/2019 Size of disturbed area during construction in acres: 5.74  
Estimated date that interim reclamation will begin: 06/30/2020 Size of location after interim reclamation in acres: 3.50  
Estimated post-construction ground elevation: 4959

## DRILLING PROGRAM

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

Is H<sub>2</sub>S 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: Commercial Disposal

Other Disposal Description:

A Water Based Bentonitic Drilling Fluids agreement will be submitted when received.

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: Furniture Row COLO, LLC

Phone: \_\_\_\_\_

Address: 5641 Broadway

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

City: Denver State: CO Zip: 80216

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 04/17/2019

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:	3907 Feet	3160 Feet
Building Unit:	3907 Feet	3160 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	1088 Feet	109 Feet
Above Ground Utility:	3986 Feet	3287 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	1100 Feet	121 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 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

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: \_\_\_\_\_

- 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 (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 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: #78 - Weld silt loam, 0 to 3% slopes.

NRCS Map Unit Name: #57 - Pleasant silty, clay, 0 to 1% slopes, rarely ponded.

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: 3566 Feet

water well: 5280 Feet

Estimated depth to ground water at Oil and Gas Location 46 Feet

Basis for depth to groundwater and sensitive area determination:

Distance to nearest:

1. Downgradient surface water feature: aprx. 3566' SE to pond.

2. Water well: well over a mile.

3. Estimated depth to ground water at O&G location: 46' based upon DWR Permit #8880 located in the SE NE, Sec 25, 3S, 53W Northern High Plains Designated Basin.

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 Floodplain determination based on soils, topography, geomorphology and wetland data.

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 609

## 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 A Water Based Bentonitic Drilling Fluids agreement will be submitted when received.

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

Signed: \_\_\_\_\_ Date: 07/22/2019 Email: paul.gottlob@iptenergyservices.com

Print Name: PAUL GOTTLOB Title: Regulatory & Engin. Tech.

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: 12/27/2019

**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**

Material Handling and Spill Prevention	Operator shall provide the Surface Owner Agreement via Form 4 Sundry prior to commencement of any Land Application activities.
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**Best Management Practices****No BMP/COA Type****Description**

1	Traffic control	The access road will be constructed to accommodate local emergency vehicles. This road will be maintained for access at all times. Traffic will be routed to minimize local interruption.
2	Storm Water/Erosion Control	Operator will install stormwater controls in a manner consistent with good engineering practices and in a manner that will prevent offsite migration of sediment/contaminant.
3	Material Handling and Spill Prevention	Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.
4	Material Handling and Spill Prevention	Operator will construct all production facilities within lined secondary containment. Secondary containment will consist of a synthetic liner keyed into steel ring berms.

Total: 4 comment(s)

### **Attachment Check List**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
1010814	OBJECTIVE CRITERIA REVIEW MEMO
1010815	FACILITY LAYOUT DRAWING
1010816	ACCESS ROAD MAP
1010817	LOCATION DRAWING
402007793	FORM 2A SUBMITTED
402007816	NRCS MAP UNIT DESC
402007866	WASTE MANAGEMENT PLAN
402110651	HYDROLOGY MAP
402110655	LOCATION PICTURES
402110660	TOPO MAP

Total Attach: 10 Files



## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Updated construction date and estimated date to start interim reclamation per phone call with operator.	12/26/2019
OGLA	The Objective Criteria Review Memo (Doc# 1010814) is attached to this Form 2A. Following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.	12/09/2019
OGLA	COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria #5.c	12/09/2019
OGLA	<p>Per Operator request:</p> <p>Removed the Production Pit from the Facilities List as it requires a Form 15 to be submitted with the Form 2A. To date, a Form 15 has not been submitted.</p> <p>Removed the skim tank from the Facilities List as a skim tank is required for the use of a production pit, of which has not been applied for correctly.</p> <p>Replaced the Facility Layout Drawing, Location Drawing and Access Road Map with updated attachments that do not include the production pits as the Location will not be using production pits.</p> <p>Changed the acres of disturbance based on the dimensions reported on the updated Location Drawing and Facility Layout Drawing.</p> <p>Changed Sensitive Area to YES as the Location lies within the Northern High Plains Designated Basin.</p> <p>Changed the estimated depth to groundwater to 46 feet based on the depth to groundwater reported for DWR Water Well Permit #8880 located in the SE NE, Sec 25, 3S, 53W, the closest water well having a reported depth to groundwater. Changed the Basis Statement to reflect DWR Water Well permit #8880.</p> <p>Based on the review of the National Wetland Inventory Maps, two mapped wetlands lie approximately 1900 feet to the east and 2300 to the south of the proposed Location. Further review of these mapped wetlands indicate that they lie within active agricultural land and are no longer a functioning water resource. The closest surface water feature lies approximately 3566 feet to the east/southeast as reported on this Form 2A.</p> <p>Changed Floodplain Determination to "OTHER." Added "Floodplain dertermination based on soils, topography, geomorphology and wetland data." to the Floodplain Determination.</p> <p>Modified the BMPs.</p> <p>Removed the Pre-Application Notification Attachemnt as it is not required.</p>	11/19/2019
Permit	Passed Completeness.	08/01/2019
Permit	Returned to draft per operator request.	07/23/2019

Total: 6 comment(s)