

FORM
2A

Rev
02/20

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:

402201254

Date Received:

12/19/2019

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

Location ID:

474451

Expiration Date:

03/29/2023

☒ 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: 10690
Name: IMPETRO RESOURCES LLC
Address: 2820 LOGAN DRIVE
City: LOVELAND State: CO Zip: 80538

Contact Information

Name: SAM BRADLEY
Phone: (970) 593-8626
Fax: ()
email: sbradley.impetro@gmail.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20180029 ☐ Gas Facility Surety ID (Rule 711): _____
☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: ALICE SEEDORF PRODUCTION FACILITY Number: _____
County: WASHINGTON
QuarterQuarter: SESW Section: 22 Township: 2N Range: 49W Meridian: 6 Ground Elevation: 4240

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: 185 feet FSL from North or South section line
1813 feet FWL from East or West section line

Latitude: 40.119550 Longitude: -102.844640

GPS Quality Value: 2.3 Type of GPS Quality Value: PDOP Date of Measurement: 12/03/2019

Instrument Operator's Name: ELIJAH FRANE

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 #**

Production Facilities Location serves Well(s) _____ 402200988

FACILITIES

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

Wells _____	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 _____	Separators* _____	Injection Pumps* _____	Cavity Pumps* _____	Gas Compressors* _____
Gas or Diesel Motors* _____	Electric Motors _____	Electric Generators* _____	Fuel Tanks* _____	LACT Unit* _____
Dehydrator Units* _____	Vapor Recovery Unit* _____	VOC Combustor* 1	Flare* _____	Pigging Station* _____

OTHER FACILITIES*

Other Facility Type **Number**

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 production facility tanks will have a 3 inch buried SDR-11 HDPE pipe.

CONSTRUCTION

Date planned to commence construction: 04/01/2020 Size of disturbed area during construction in acres: 1.72
Estimated date that interim reclamation will begin: 07/01/2020 Size of location after interim reclamation in acres: 1.72
Estimated post-construction ground elevation: 4240

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: No

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: _____ Drilling Fluids Disposal Method: _____

Cutting Disposal: _____ Cuttings Disposal Method: _____

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: Seeds Ranch Inc.

Phone: _____

Address: 2505 C.R. 38

Fax: _____

Address: _____

Email: _____

City: Yuma State: CO Zip: 80759

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 10/21/2019

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:	Feet	3292 Feet
Building Unit:	Feet	3292 Feet
High Occupancy Building Unit:	Feet	5280 Feet
Designated Outside Activity Area:	Feet	5280 Feet
Public Road:	Feet	30 Feet
Above Ground Utility:	Feet	1618 Feet
Railroad:	Feet	5280 Feet
Property Line:	Feet	30 Feet
School Facility::	Feet	5280 Feet
School Property Line:	Feet	5280 Feet
Child Care Center:	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

- 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: #78 Weld silt loam, 0 to 3% 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: 1823 Feet

water well: 3346 Feet

Estimated depth to ground water at Oil and Gas Location 216 Feet

Basis for depth to groundwater and sensitive area determination:

Distance to nearest:

Downgradient surface water feature: aprx 1823 West to a surface pond.

Due to location being within the Designated Groundwater Management Area it is deemed a Sensitive Area. Water well permit # 270203 has a depth of 256'.

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer zone: No

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

Is the Location within a
Floodplain?

☒ No ☐ Yes

Floodplain Data Sources Reviewed (check all that apply)

☐ Federal (FEMA)

☐ State

☐ County

☐ Local

☒ Other

COGCC technical review evaluated soil type, topography, and geomorphology and determined that this location is not in a floodplain.

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

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

Signed: _____ Date: 12/19/2019 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: 3/30/2020

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

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Best Management Practices

No	BMP/COA Type	Description
1	Traffic control	Access Roads: 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. Dust control measures will also be utilized if needed.
2	General Housekeeping	Trash Removal: All trash, debris and material shall be removed and legally disposed of as applicable.
3	Storm Water/Erosion Control	Operator shall install stormwater controls around the perimeter of the Location prior to commencing construction activities. Stormwater controls shall be constructed and maintained in a manner consistent with good engineering practices and shall prevent offsite migration of sediment/contaminant
4	Material Handling and Spill Prevention	Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.
5	Dust control	Dust: 805.c: 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 including watering or mag chloride as needed, restriction of construction activity during high wind days. Additional management practices such as road surfacing, wind breaks and barriers may be used.
6	Construction	Berm Construction: Secondary containment devices will be constructed around crude oil, produced water storage tanks and heater and be lined and will enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. All berms and containment devices will be inspected at regular intervals and maintained in good condition. No potential ignition sources will be installed inside the secondary containment area unless the containment area encloses a fired vessel.
7	Odor mitigation	Rule 805: Oil & gas facilities and equipment shall be operated in such a manner that odors and dust do not constitute a nuisance or hazard to public welfare.

Total: 7 comment(s)

Attachment Check List

Att Doc Num	Name
2479236	HYDROLOGY MAP
2479237	LOCATION DRAWING
2479251	OBJECTIVE CRITERIA REVIEW MEMO
2479252	CORRESPONDENCE
402201254	FORM 2A SUBMITTED
402265633	SURFACE AGRMT/SURETY
402265649	LOCATION PICTURES
402267108	ACCESS ROAD MAP
402267121	NRCS MAP UNIT DESC

Total Attach: 9 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Requested and received concurrence to change Minerals Beneath producing to location to yes, remove the Waste Management Plan, and remove reference to Waste Management Plan in comment.	03/30/2020
Final Review	Final Review complete; task passed.	03/27/2020
OGLA	Requested and received piping description, concurrence to update floodplain determination in water resources tab, and update trash removal BMP.	03/27/2020
Final Review	Final Review Pending - referred to OGLA staff for follow up.	03/26/2020
OGLA	The Objective Criteria Review Memo (Doc# 2479251) 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.	03/26/2020
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.	03/26/2020
OGLA	Per phone conversation, concurrence was given to add a VOC combustor to the Facilities section and remove the Facility Layout Drawing from attachments.	03/12/2020
OGLA	State and Federal floodplain map boxes unchecked and other checkbox checked. COGCC technical review evaluated soil type, topography, and geomorphology and determined that this location is not in a floodplain.	03/11/2020
OGLA	Received updated inspection BMP, secondary containment BMP, Hydrology Map, and Location Drawing. Requested floodplain checkboxes and comment verification.	03/09/2020
OGLA	Response received from operator. Waste Management, Sensitive Area for Water, Dust BMP, and Stormwater BMP are resolved. Resolution still needed on Inspection BMP and Secondary Containment BMP. Invalid scale on Hydrology Map and Location Drawing.	03/06/2020
OGLA	Received from operator the following: Concurrence to removed unneeded attachments, updated construction start and interim start dates, Sensitive Area due to Water Resources answer change, depth to groundwater change, removal of improperly related form, removal of fencing BMP, dust BMP language change, secondary containment BMP, stormwater BMP, and information about gas at location. Still waiting on: waste management comment, Sensitive Area comment inadequate, inspection BMP, dust BMP, secondary containment BMP, stormwater BMP.	03/02/2020
OGLA	Requested the following information and corrections from operator: Concurrence to remove unnecessary attachments, Waste Management clarification and comment update, updated construction start and interim start dates, Sensitive Area due to water resources answer change, depth to water change, removal of incorrectly linked related form, fencing BMP removal, inspection BMP language changes, dust BMP language change, a secondary containment BMP, a stormwater BMP, and information about gas at location.	02/21/2020
OGLA	This Form has passed completeness.	12/23/2019

Total: 13 comment(s)