

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:

402443658

**(SUBMITTED)**

Date Received:

## 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:

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: 47120

Name: KERR MCGEE OIL & GAS ONSHORE LP

Address: P O BOX 173779

City: DENVER      State: CO      Zip: 80217-3779

### Contact Information

Name: Mhamed Samet

Phone: (307) 6605553

Fax: ( )

email: Sam\_Samet@oxy.com

### FINANCIAL ASSURANCE

Plugging and Abandonment Bond Surety ID (Rule 706): 20010124     Gas Facility Surety ID (Rule 711): \_\_\_\_\_

Waste Management Surety ID (Rule 704): \_\_\_\_\_

### LOCATION IDENTIFICATION

Name: GADDIS      Number: 3-36HZ PAD

County: WELD

Quarter: NENW    Section: 36    Township: 4N    Range: 68W    Meridian: 6    Ground Elevation: 5046

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: 302 feet FNL from North or South section line

1906 feet FWL from East or West section line

Latitude: 40.276572      Longitude: -104.953885

GPS Quality Value: 1.4      Type of GPS Quality Value: PDOP      Date of Measurement: 03/10/2020

Instrument Operator's Name: TRAVIS HOLLAND

### 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 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: WOGLA \_\_\_\_\_

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

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

Additional explanation of local process:

WOGLA notices deemed complete on 7/15/2020. The WOGLA application will be submitted after the 30 days notice period expires. Town of Berthoud limits within 1500 feet of oil and gas location. A WOGLA notice was sent to the local government designee of the town and no comments were received.

### 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	6	Oil Tanks*	_____	Condensate Tanks*	1	Water Tanks*	3	Buried Produced Water Vaults*	_____
Drilling Pits	_____	Production Pits*	_____	Special Purpose Pits	_____	Multi-Well Pits*	_____	Modular Large Volume Tanks	_____
Pump Jacks	6	Separators*	7	Injection Pumps*	_____	Cavity Pumps*	_____	Gas Compressors*	_____
Gas or Diesel Motors*	_____	Electric Motors	_____	Electric Generators*	_____	Fuel Tanks*	_____	LACT Unit*	2
Dehydrator Units*	_____	Vapor Recovery Unit*	_____	VOC Combustor*	1	Flare*	_____	Pigging Station*	_____

### OTHER FACILITIES\*

Other Facility Type	Number
Air Compressors	1
Meter Building	1
Temporary 500 barrel tank	13
Temporary ECD	5
Temporary Generator	1
Temporary Propane Tank	1
Temporary Purge Flare	3

\*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:

Please see Operator Comments Section for pipeline descriptions.

## CONSTRUCTION

Date planned to commence construction: 01/01/2021 Size of disturbed area during construction in acres: 10.73  
Estimated date that interim reclamation will begin: 06/01/2021 Size of location after interim reclamation in acres: 2.68  
Estimated post-construction ground elevation: 5045

## 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? Yes

## 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:

Please see attached Waste Management plan.

Beneficial reuse or land application plan submitted? Yes

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

Centralized E&P Waste Management Facility ID, if applicable: 149021

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Gaddis Family Registered Phone: \_\_\_\_\_

Address: 8995 Prairie Knoll Drive Fax: \_\_\_\_\_

Address: \_\_\_\_\_ Email: JGaddis@lyonsgaddis.com

City: Longmont State: CO Zip: 80503

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 02/11/2020

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:	755 Feet	782 Feet
Building Unit:	2842 Feet	2620 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	304 Feet	88 Feet
Above Ground Utility:	2980 Feet	2460 Feet
Railroad:	3683 Feet	3452 Feet
Property Line:	77 Feet	86 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

- 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: 42—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: 10 Feet

water well: 4913 Feet

Estimated depth to ground water at Oil and Gas Location 53 Feet

Basis for depth to groundwater and sensitive area determination:

Ditch: 10' ESE Elev: 5035'  
Ditch: 70' SE Elev: 5037'  
Farmers Extension Canal: 108' S Elev: 5035'  
Pond: 297' S Elev: 5037'  
Ditch: 842' S Elev: 5027'  
Loc Elev: 5046'  
Nearest water wells:  
4913' NW, Permit 6648-R, depth 35', Static Water Level 14', Elev 5007' (nearest well with record of being drilled)  
Sensitive Area Determination: SENSITIVE AREA, downgradient surface water feature within 1,000'  
Location is NOT in floodplain according to Weld County and FEMA  
  
(SWL calc: (5046 - 5007) + 14 = 53)

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

## 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



Comment 1: No ditches will be impacted by construction of this oil and gas location. No permitting is required with USACE.

Comment 2: Temporary above ground polyethylene water pipelines (diameter 10" - 12" with a 60 BPM capacity) will deliver water to location operations from larger trunk lines.

Comment 3: 7 flow lines will flow to the production facility location. During production, flow direction in the flow lines is from the wellhead to the production facility. The size of flow lines is typically 2". Flow lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility, approximately 150'.

Comment 4: 7 compressed air supply lines will also be installed from the well head to the production facility. During operation flow direction in the supply lines will be from the production facility to the well head. The size of the supply lines is typically 1". Supply lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility, approximately 150'.

Comment 5: Gas lift lines are also occasionally installed (one per well) from the well head to the production facility. During operation flow direction in the gas lift lines will be from the production facility to the well head. The size of the gas lift lines is typically 2". Gas lift lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the tank battery, approximately 150'.

Comment 6: CUSTODY TRANSFER: Gas custody transfer occurs at the custody transfer meter located on the proposed production facility location. Oil custody transfer occurs at the LACT Unit located on the proposed production facility location.

Comment 7: Construction and interim reclamation start dates listed are preliminary and subject to change based off future operational schedules.

Comment 8: Well distance to property line closer than 150'. SUA contains waiver to setback provisions defined in Rule 603. Surface agreement amendment was signed by surface owner to include both parcels in the development.

Comment 9: Two 500 barrel skid-mounted frac tanks will be temporarily placed onsite for use of the pre-spud rig only. One tank will store water and the other will store water-based mud. A temporary ECD may be utilized during drilling. 11 temporary 500 barrel skid-mounted frac tanks will be utilized during flowback and initially for produced water. It is estimated the 4 temporary ECDs and the temporary tanks will be on location for 9 - 12 months and will be removed as water production declines. A generator may be placed on location if needed and would be in place until electric power is available. Purge flares may be on location for up to 60 days. A temporary 250-gallon propane tank will be used on to provide fuel gas during facility equipment start up.

**DISTANCES TO PERMANENT EDGES OF EQUIPMENT:**

BUILDING:782 FT  
BUILDING UNIT:2719 FT  
HIGH OCCUPANCY BUILDING UNIT:5280 FT  
DESIGNATED OUTSIDE ACTIVITY AREA:5280 FT  
PUBLIC ROAD:160 FT  
ABOVE GROUND UTILITY:2576 FT  
RAILROAD:3477 FT  
PROPERTY LINE:158 FT  
SCHOOL FACILITY:5280 FT  
SCHOOL PROPERTY LINE:5280 FT  
CHILD CARE CENTER:5280 FT

**DISTANCES TO TEMPORARY EDGES OF EQUIPMENT:**

BUILDING:868 FT  
BUILDING UNIT:2620 FT  
HIGH OCCUPANCY BUILDING UNIT:5280 FT  
DESIGNATED OUTSIDE ACTIVITY AREA:5280 FT  
PUBLIC ROAD:88 FT  
ABOVE GROUND UTILITY:2460 FT  
RAILROAD:3452 FT  
PROPERTY LINE:86 FT  
SCHOOL FACILITY:5280 FT  
SCHOOL PROPERTY LINE:5280 FT  
CHILD CARE CENTER:5280 FT

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

Signed: \_\_\_\_\_ Date: \_\_\_\_\_ Email: DJRegulatory@anadarko.com

Print Name: Mhamed Samet Title: Regulatory Analyst

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.**

<u>COA Type</u>	<u>Description</u>
<b><u>Best Management Practices</u></b>	
<u>No BMP/COA Type</u>	<u>Description</u>
1 Planning	Access Roads: KMG will utilize build an access road off of Weld County Road 40. The road will be properly constructed and maintained to accommodate for local emergency vehicle access.
2 Planning	As a part of planning this proposed location, Kerr-McGee has held multi-disciplinary Surface Impact Planning Meetings regarding the impacts and mitigations associated with this proposed location. The toll-free number and email for the Occidental Colorado Response Line will be posted at the entrance to the lease access road for stakeholders during drilling and completion operations at this proposed location.
3 Community Outreach and Notification	Courtesy Notifications will be sent to all property owners within one mile of the proposed location prior to drilling operations and again prior to completions operations, providing contact information for the Occidental Colorado Response Line and online resources.
4 Traffic control	KMG currently plans to use the water-on-demand system on this location which is a network of over 180 miles of underground pipeline that stretches the length of the 20-mile by 30-mile field to source and transport water to completions crews. This system eliminates more than 2,000 truck trips per day, also reducing associated concerns of traffic, noise, emissions and dust.
5 Traffic control	Prior to the commencement of operations, the operator will obtain an access permit from Weld County and implement traffic control plans.
6 General Housekeeping	Loadlines: All loadlines shall be bullplugged or capped.
7 General Housekeeping	Removal of Surface Trash: A commercial size trash bin for removing debris will be located on site. This bin will be for use by all parties affiliated with the operation. Upon completion of operations, the commercial trash bin will be removed from the location and disposed of in an appropriate manner.
8 General Housekeeping	Lighting: Site lighting shall be shielded and directed downward and inward toward operations to avoid glare on public roads and nearby Building Units.
9 Storm Water/Erosion Control	Kerr-McGee will create tertiary containment around the well pad and facility by constructing a berm/ditch around the oil & gas location with sediment traps to further protect adjacent water features. A culvert is proposed at the access road. The natural grade at this proposed location slopes from west to east. Cut from the West side of the pad will be used to fill the eastern side of the pad and level the grade. Once graded the well pad will be sloped 0.5% to the east and west from approximately the center of the well pad. The ditch/berm will be engineered to contain and divert runoff. The ditch/berm will direct flow from west to east and north to south through the sediment traps.

10	Storm Water/Erosion Control	Site-Specific Measures: During active construction, drilling, and completions, with personnel on location, daily inspections will occur. During non-active, but while under construction, site inspections will occur every 14 days or after major rain events. When construction is completed and the location is on production, site inspections will occur every 28 days with additional inspections after major rain events. When construction is completed and the location is on production, site inspections will occur every 28 days with additional inspections after major rain events. During construction, stormwater features will be checked more frequently (up to daily, depending on the intensity of construction activity). These construction checks will not be formally documented, since they occur as part of construction oversight, and minor issues will be corrected with no further documentation. If and when larger issues are noted in these construction checks, the associated corrective actions would be documented.
11	Material Handling and Spill Prevention	Berm Construction: A geosynthetic liner will be laid under the long-term tanks on this location and a metal containment will be constructed. Secondary containment devices will be constructed around crude oil, condensate, and produced water storage tanks and shall enclose an area sufficient to contain and provide secondary containment for 150% of the largest single tank. Secondary containment devices shall be inspected at the same time as stormwater inspections, with personnel on location, daily inspections will occur. During non-active, but while under construction, site inspections will occur every 14 days. When construction is completed and the Location is on production, site inspections will occur every 28 days.
12	Material Handling and Spill Prevention	Temporary produced water storage tanks shall be designed, constructed, and maintained in accordance with the following portions of the National Fire Protection Association (NFPA) Code 30 (2008 version): 1) Tanks are built to engineering standards using noncombustible materials, with relief devise sizing based on API 2000 standards. 2) Tanks are inspected and maintained while in use. 3) The only pipes within the containment are related to the temporary tanks (i.e. no external piping is collocated within the containment), and firefighting equipment is likewise not stored within the containment area.
13	Material Handling and Spill Prevention	Leak Detection Plan: Automation technology will be utilized at this facility. This technology includes the use of fluid level monitoring for the tanks and produced water sumps, high-level shut offs, and electronic sensors to monitor the interstitial space of double-walled produced water sumps. All automation is monitored by Kerr-McGee's Integrated Operations Center (IOC), which is manned 24 hours per day, 7 days per
14	Material Handling and Spill Prevention	Berm Construction: The temporary produced water storage tanks will be staged on a geosynthetic liner and surrounded by an earthen berm. The berms shall enclose an area sufficient to provide secondary containment for 150% of the volume of the largest single tank and shall be sufficiently impervious to contain spilled or released material. Berms and the liner shall be inspected at the same time as stormwater inspections, with personnel on location, daily inspections will occur. During non-active, but while under construction, site inspections will occur every 14 days. When construction is completed and the location is on production, site inspections will occur every 28 days.
15	Material Handling and Spill Prevention	Pit Level Indicators: All storage tanks used for active drilling operations (used in lieu of pits) contain pit level monitors with Electronic Drilling Recorders (EDR). KMG uses EDRs with pit level monitor(s) and alarm(s) for production rigs. Basic level gauges are used on tanks utilized for the surface rig.
16	Material Handling and Spill Prevention	Berm Construction - Separators: Around all separators, secondary containment in the form of a 22 inches steel berm will be constructed and buried 13 inches with the remaining 9 inches exposed above grade. The seams and penetrations of the berm are sealed. This shall be inspected at the same time as stormwater inspections, with personnel on location, daily inspections will occur. During non-active, but while under construction, site inspections will occur every 14 days. When construction is completed and the Location is on production, site inspections will occur every 28 days.
17	Material Handling and Spill Prevention	All piping is pressure tested and inspected for leaks prior beginning flowback. During the entirety of flowback piping is visually inspected for fluid leaks throughout the 24 hour operation. Once the wells have been turned over to production (oil, gas and water through the facility) produced water will be diverted to the temporary tanks west of the production facility until the tanks are no longer needed. The pipelines connecting to the temporary 500bbl tanks will be buried. Prior to produced water being transported through the pipe pressure tests will confirm pipe integrity.
18	Dust control	Dust: Water will be placed on unpaved roads to mitigate dust.

19	Construction	Fencing Requirements: The completed wellsites will be surrounded with a fence and gate with adequate lock to restrict access to authorized personnel only. KMG personnel will monitor the wellsites regularly upon completion of the wells. Authorized representatives and/or KMG personnel shall be on-site during drilling and completion operations.
20	Emissions mitigation	Temporary ECD(s) will be utilized to mitigate releases of emissions from temporary produced water storage tanks for the duration which the tanks are on location and being used.
21	Odor mitigation	805b Odor Mitigation. Additional BMPs for this location are: 1) the storage of excess drilling fluid (e.g., fluid not being used in the active mud system) in closed, upright tanks. 2) Drill cutting will be run through a centrifugal dryer to minimize odor during temporary time on location and during transport to disposal. 3) Odor neutralizer will be used in the active mud system for management of odors within 24 hours of receipt of a stakeholder grievance. 4) Drill cuttings will not remain in storage at the oil and gas location for more than a 24 hours period. Disposal will occur before the end of the 24 hours period.
22	Drilling/Completion Operations	Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions 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, KMG shall not produce the wells without an approved variance per Rule 805.b. (3)C.Date
23	Final Reclamation	Well Site Cleared: The wellsite will be cleared of all non-essential equipment within ninety (90) days after all wells associated with the pad have been plugged and abandoned.

Total: 23 comment(s)

### Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402446388	NRCS MAP UNIT DESC
402446401	LOCATION DRAWING
402446405	HYDROLOGY MAP
402446418	ACCESS ROAD MAP
402446421	WELL LOCATION PLAT
402446427	MULTI-WELL PLAN
402446444	LOCATION PICTURES
402449062	FACILITY LAYOUT DRAWING
402463570	WASTE MANAGEMENT PLAN
402463572	SURFACE AGRMT/SURETY
402463574	SURFACE AGRMT/SURETY

Total Attach: 11 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

**Public Comments**

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

