

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:

402201622

Date Received:

10/14/2019

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:

479032

Expiration Date:

01/06/2024

☒ 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: 10598
Name: SANDRIDGE EXPLORATION & PRODUCTION LLC
Address: 123 ROBERT S KERR AVE
City: OKLAHOMA CITY State: OK Zip: 73102

Contact Information

Name: Diane Overbey
Phone: (405) 429 5828
Fax: ()
email: doverbey@sandridgeenergy.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20170015 ☐ Gas Facility Surety ID (Rule 711): _____

☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: PRU High Point 0880 Number: S28 Pad
County: JACKSON
QuarterQuarter: NENW Section: 28 Township: 8N Range: 80W Meridian: 6 Ground Elevation: 8199
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: 892 feet FNL from North or South section line
1826 feet FWL from East or West section line
Latitude: 40.641530 Longitude: -106.381300
GPS Quality Value: 1.2 Type of GPS Quality Value: PDOP Date of Measurement: 05/24/2019
Instrument Operator's Name: Levi Kurtzer

LOCAL GOVERNMENT INFORMATION

County: JACKSON 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:

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 458558 _____

FACILITIES

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

Wells	4	Oil Tanks*	_____	Condensate Tanks*	1	Water Tanks*	_____	Buried Produced Water Vaults*	_____
Drilling Pits	_____	Production Pits*	_____	Special Purpose Pits	_____	Multi-Well Pits*	_____	Modular Large Volume Tanks	_____
Pump Jacks	4	Separators*	1	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*	3	Flare*	1	Pigging Station*	_____

OTHER FACILITIES*

Other Facility Type	Number
Triplex Pumps	4
Gas Meter	1
Allocation Vessels	4
Power Fluid Vessels	4

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:

All offsite take away pipelines will be 8" or smaller and be at least schedule 40 steel lines and will meet API standards. All location flowlines connected to the takeaway lines will be 4" or smaller and be at least schedule 40 steel lines and will meet APD standards. All pipelines will be buried to a minimum of 4' below grade.

CONSTRUCTION

Date planned to commence construction: 05/01/2021 Size of disturbed area during construction in acres: 5.41
Estimated date that interim reclamation will begin: 05/01/2022 Size of location after interim reclamation in acres: 2.46
Estimated post-construction ground elevation: 8196

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? 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:

Beneficial reuse or land application plan submitted?

Reuse Facility ID: or Document Number:

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

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: BLM

Phone:

Address: 2103 E Park Avenue

Fax:

Address: c/o Kremmling Field Office

Email:

City: Kremmling State: CO Zip: 80549

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

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:	3508 Feet	3216 Feet
Building Unit:	3578 Feet	3284 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	3870 Feet	3597 Feet
Above Ground Utility:	4119 Feet	3840 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	658 Feet	382 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: Te - Tealson-Rock land association

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: 05/24/2019

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: 130 Feet

water well: 2590 Feet

Estimated depth to ground water at Oil and Gas Location 76 Feet

Basis for depth to groundwater and sensitive area determination:

Depth to groundwater taken from water well Permit #40552 - Boyer Ridge Land LLC; Domestic and Stock water well; total depth of 95'; first water bearing zone at 76' in bedrock (sandstone with conglomerate); screened from 78' to 94'; pumping rate - 35 gpm. Location is in a sensitive area due to proximity of surface water features; dry washes (260' to the northwest and 130' to the southeast) shown on the USGS topographic map and aerial maps are ephemeral drainages. These dry washes are low areas where surface precipitation can flow since they are on the side of a hill and are not sourced from a spring or creek.

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

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 10/23/2019

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

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

Signed: _____ Date: 10/14/2019 Email: regulatory@ascentgeomatics.com

Print Name: Justin Garrett 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: 1/7/2021

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

Planning	Within 12 months of approval of this Form 2A, operator will submit via a Form 4 Sundry Notice, four (4) color photographs of the Reference Area taken from each cardinal direction. Each photograph will be identified by date taken, Well or Oil and Gas Location name, and direction of view. The photographs will be taken during the peak growing season and will clearly depict vegetation cover.
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Best Management Practices

No BMP/COA Type

Description

1	Storm Water/Erosion Control	<ul style="list-style-type: none">Operator will implement a stormwater and erosion control plan to prevent sedimentation and erosion. The use of earthen berms, seeding of slopes on the outside of the perimeter earthen berms, and placement of waddles and silt fencing outside of the perimeter berm and the topsoil stockpiles along the southern edge of the well pad will be used to prevent erosion and non-source pollution. These items also control water runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. At the PRU High Point 0880 S28 Pad, the compacted earthen perimeter berm will be at least 18 inches in height and will be seeded on the outside slopes and surrounded with silt fence.
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2	Material Handling and Spill Prevention	<ul style="list-style-type: none"> • For offsite fluid/product storage - all produced fluids routed through the allocation vessels will then be sent via a pipeline to an offsite central tank battery production facility with existing secondary containment system features (synthetic liners tied into steel containment rings). • For onsite fluid/product storage during maintenance or flow through operations - all produced fluids will be routed to new separation equipment. Following separation, the gas stream (which may contain some produced fluids) will be routed via flowlines to another separator/gas metering unit; from there, condensate will be sent to one onsite condensate storage tank, which has secondary containment consisting of a synthetic liner inside a compacted earthen berm, while the gas will be sent to combustors. • Pollution control containers (spill boxes) are used on truck loading lines and are placed within the limits of the secondary containment system. • To protect groundwater resources, operator shall use cathodic protection on buried steel lines to mitigate corrosion. • To protect surface water and groundwater resources, the wells located on this pad will be equipped with remote shut-in capabilities prior to commencing production. Remote shut-in capabilities include the ability to shut-in the well remotely via automation controls. Operator will also have remote monitoring and shut down capabilities including automatic shutdown pressure devices installed on process vessels with remote monitoring capabilities.
3	Construction	<ul style="list-style-type: none"> • During construction only the minimum amount of vegetation necessary for the construction of roads and facilities will be removed. Topsoil will be conserved during excavation and will not be reused as cover on disturbed areas to facilitate regrowth of vegetation. No construction or routine maintenance activities will be performed during periods when the soil is too wet to adequately support construction equipment.
4	Construction	<ul style="list-style-type: none"> • Light sources will be directed downwards and away from public roads and occupied structures.
5	Emissions mitigation	<ul style="list-style-type: none"> • SandRidge will follow all requirements of COGCC's current policy- NOTICE TO OPERATORS, Rule 912. VENTING OR FLARING PRODUCED NATURAL GAS- STATEWIDE, dated January 12, 2016; and to Rule 912. VENTING OR FLARING NATURAL GAS. a. thru e. in regards to venting and flaring; potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated in adherence to COGCC's current policy and rules.
6	Drilling/Completion Operations	<ul style="list-style-type: none"> • Operator utilizes a portable containment liner under the substructure of the drilling rig during drilling activities. This protects shallow groundwater from any potential spills surrounding the rig during drilling. A liquid release would simply be vacuumed up from the liner. When drilling activity is completed, the liner is removed and transferred to the next drilling location. • A closed loop system will be implemented during drilling (as indicated on the Form 2 and Form 2A). • The moisture content of all drill cuttings managed onsite will be kept as low as practicable to prevent accumulation of liquids greater than the minimum amounts. • All cuttings generated during drilling will be kept in tanks or containers, or placed in a bermed portion of the well pad prior to disposition. The surface where the cuttings will be placed will be constructed to be sufficiently impervious (or lined) to keep any material from migrating into the subsurface. • Flowback and stimulation fluids will be sent to enclosed tanks, separators, or other containment or filtering equipment before the fluids can be placed into any pipeline, storage vessel, or into tanker trucks for offsite disposal. No open top tanks can be used for initial flowback fluids containment. Secondary containment for flowback storage tanks shall meet the requirements of Rule 906.d.(1). • The trucks used for offsite disposal will have a liner and the operator will implement measures (covers, misting, etc.) to reduce dust and PM emissions during transport of solid materials from the well pad location. • No open top tanks will be used for initial flowback storage tanks. • Secondary containment for flowback storage tanks will meet the requirements of Rule 906.d.(1)
7	CPW-Wildlife - Minimization-Deer and Elk	<p>EXCLUDING EMERGENCY SITUATIONS, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the winter season (December 1st through April 15th).</p>

8	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	The operator agrees to use hospital grade mufflers on production equipment (or house such equipment in an enclosed structure) including compressors, pump jacks or other motors necessary to run operations at site. Mufflers will be pointed upwards to dissipate potential vibration.
9	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	The operator agrees to preclude the use of aggressive non-native grasses in greater sage-grouse habitat reclamation.
10	CPW-Wildlife - Minimization-Black Bear	The operator will implement Rule 1204.a.1 by storing all garbage, trash, and debris in enclosed bear proof trash containers and transported to an approved disposal facility during drilling and completions operations. No garbage, trash, and debris will be disposed of on location. The well site and access road will be kept free of trash and debris at all times.
11	CPW-Wildlife - Minimization-Deer and Elk	The operator agrees to establish company guidelines to minimize wildlife mortality from vehicle collisions on roads. Slow speeds and increased awareness among employees and contractors should lessen impacts to wildlife.
12	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (OM) within 12 months of cessation of drilling/after well completion, unless new wells are scheduled on the same location or a variance is agreed upon with CPW and COGCC.
13	CPW-Wildlife - Minimization-Deer and Elk	During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife.
14	CPW-Wildlife - Avoidance- Deer and Elk	Within mapped big game winter range habitat, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between December 1st and April 15th.
15	CPW-Wildlife - Avoidance- GREATER SAGE- GROUSE	Within greater sage-grouse production habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between March 1st and June 30th.
16	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	EXCLUDING EMERGENCY SITUATIONS, within greater sage-grouse production habitats, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the lekking, nesting, and early brood-rearing seasons (March 1st through May 15th).
17	CPW-Wildlife - Minimization-RAPTORS	Exclusionary devices will be installed to prevent bird and other wildlife from accessing equipment stacks, vents, and openings.
18	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens.
19	CPW-Wildlife - Avoidance- Black Bear	The operator agrees to report bear conflicts immediately to CPW staff.
20	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	With necessary surface owner consent, follow CPW's wildlife friendly fencing guidelines for any new fences within greater sage-grouse production habitat.
21	CPW-Wildlife - Minimization-Deer and Elk	Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the Wildlife Mitigation Plan (WMP) boundary.
22	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek within 2 miles of facilities. *Active greater sage-grouse lek is within 1.8 miles of the propose well pad location.
23	CPW-Wildlife - Minimization-GREATER SAGE-GROUSE	The operator agrees to utilize combustion chambers or enclosed flaring devices to eliminate open flares at this location.

Total: 23 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
2109267	AERIAL PHOTO MAP
2109268	INTERIM RECLAMATION AND FACILITY LAYOUT DRAWING
2109269	SENSITIVE WILDLIFE HABITAT MAP
2109271	APPROVED FEDERAL APD - WELL PRU HIGH POINT 0880 4-28H16
2109272	OBJECTIVE CRITERIA REVIEW MEMO
402201622	FORM 2A SUBMITTED
402204983	ACCESS ROAD MAP
402204984	CONST. LAYOUT DRAWINGS
402204987	LOCATION DRAWING
402204988	REFERENCE AREA MAP
402204993	REFERENCE AREA PICTURES
402204994	LOCATION PICTURES
402204997	HYDROLOGY MAP
402205001	MULTI-WELL PLAN
402205004	NRCS MAP UNIT DESC

Total Attach: 15 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	01/07/2021 - added COA requiring that Reference Area pictures be taken during the growing season within 12 months of approval of this Form 2A.	01/07/2021
Final Review	Final review completed.	01/04/2021
OGLA	01/04/2021 - revise date of construction per discussion with SandRidge.	01/04/2021
OGLA	11/23/2020 - passed OGLA task.	11/23/2020
OGLA	11/23/2020 - LaserFiche was not working on 11-20-20; The Objective Criteria Review Memo (Doc No 2109272) 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;	11/23/2020
OGLA	11/23/2020 - director review was completed on July 9, 2020 with the stipulation that the Federal APDs needed to be approved prior to the Form 2A being approved; operator received the approved Federal APDs in September 2020; one of the APDs (Well PRU High Point 0880 4-28H16) has been attached to this Form 2A;	11/23/2020
OGLA	07/07/2020 - completed 'Objective Criteria Review Memo'; attached supplemental drawings and revised drawings; prepared Objective Criteria Review Document (OCD) with the objective criteria review memo, pertinent maps and attachments (Sensitive Wildlife Habitat Area Maps, Aerial Photo Map, Access Road Map, Hydrology Map, Construction/Stormwater Control Drawing, and Interim Reclamation and Facility Layout Drawing), and pertinent sections of the current Form 2A; emailed OCD to the director in preparation for director review on 07-09-2020; passed OGLA-181 task;	07/07/2020
OGLA	07/06/2020 - continued 'Objective Criteria Review Memo'; discussed timing of operations and expected timeframe for Federal APD approvals with SandRidge;	07/06/2020
OGLA	06/17/2020 - continued OGLA Form 2A technical review; prepared 'Objective Criteria Review Memo'; revised date of construction from 07/01/2020 to 08/01/2020, date of interim reclamation from 12/01/2020 to 05/01/2022, and size of location after interim reclamation from 4.42 acres to 2.46 acres per operator;	06/17/2020
OGLA	06/16/2020 - initiated OGLA Form 2A review; requested confirmation of CPW recommended wildlife BMPs from the recently signed Wildlife Mitigation Plan between CPW and SandRidge; received confirmation to revise and/or add seventeen (17) wildlife BMPs;	06/16/2020

OGLA	02/19/2020 - COGCC staff reviewed and considered all public comments received for this Form 2A.	02/19/2020
DOW	<p>This Form 2A is being submitted for a new location well-pad facility (High Point 0880) in Section 28, T8N, R80W on BLM FED/FED in Jackson County. The proposed facilities on the new pad include 4 wells (2 north and 2 south), 4 oil tanks, 1 condensate tank, 1 separator, 3 combustors, 1 flare; and pipelines (to existing production facilities on Peterson Ridge Pad.</p> <p>CPW attended an on-site with SandRidge and BLM on Oct 26, 2017. The proposed location occurred within the following Sensitive Wildlife Habitats (SWH):</p> <ol style="list-style-type: none"> 1) Greater Sage-grouse (GrSG) production area; distance of 1.8 miles to active GrSG lek. 2) Elk winter range and severe winter range. 3) Mule deer winter range, severe winter range, and winter concentration area. 4) Pronghorn winter range. <p>CPW expressed concern about winter disturbance, but indicated that moving the location any further to the east would be much more impactful. Elk and mule deer winter use of the area depends annually on snow loads and wind direction. It was agreed to shift the pad location approximately 100 meters to the south in order to visually contain it within the draw and minimize visual impacts and disturbance. BLM also required that the proposed pipeline to the Peterson Ridge pad needed to follow the access road and avoid going through undisturbed areas. BLM would allow the High Point Pad access road to deviate from the existing 2-track due to issues with steep grade.</p> <p>CPW attended a second on-site with SandRidge and BLM on October 23, 2019, at the new pad location. CPW discussed the pad proximity to the GrSG lek and big game winter range. It was agreed that the operator would avoid activity during the Big Game Winter Range Timing Limitation (Dec 1 to April 30) and the GrSG Breeding Time Period (March 1 to June 30). These avoidance time periods align with the following BLM requirements and stipulations per Federal Lease COC65607:</p> <ol style="list-style-type: none"> 1) No surface occupancy Dec 1 to April 30 to protect big game winter range. <p>*Exception Criteria: may be granted under mild winter conditions for last 60 days of closure.</p> <ol style="list-style-type: none"> 2) COA restricting activity from March 1 to July 15 to protect GrSG breeding area. <p>The October 23, 2019 on-site was followed by a meeting to discuss the operator's draft North Park Wildlife Mitigation Plan (WMP), developed in consultation with CPW. The final WMP was signed in November 2019. The WMP designates agreed-upon GrSG lek buffers and avoidance areas, GrSG winter stipulation areas, GrSG stipulation exclusion areas, and big-game winter range stipulation areas. The WMP defines specific BMPs to minimize impacts to GrSG winter range and production habitat, and big-game winter range for Pronghorn and Mule Deer. The WMP includes a compensatory mitigation requirement to address direct loss of habitat and residual impacts from the proposed location. The mitigation requirements will be calculated using the GrSG Habitat Quantification Tool (HQT).</p> <p>The High Point 0880 Pad location is subject to the final WMP, and the following BMPs will apply:</p> <p>Greater Sage-grouse Production Habitat and Big-Game Winter Range Stipulations</p> <ol style="list-style-type: none"> 1. Within Greater Sage-grouse production habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between March 1st and June 30th. 2. Within mapped big-game winter range habitat, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between December 1st and April 15th. 	11/24/2019

3. EXCLUDING EMERGENCY SITUATIONS, within Greater-Sage-grouse production habitats, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the lekking, nesting, and early brood-rearing seasons (March 1st through May 15th).

4. EXCLUDING EMERGENCY SITUATIONS, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the winter season (December 1st through April 15th).

5. Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek within 2 miles of facilities. *Active Lek within 1.8 miles of pad location

6. To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens.

7. With necessary surface owner consent, follow CPW's wildlife friendly fencing guidelines for any new fences within Greater Sage-grouse production habitat.

8. Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP Boundary.

9. Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities.

10. Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (OM) within 12 months of cessation of drilling/after well completion, unless new wells are scheduled on the same location or a variance is agreed upon with CPW and COGCC.

11. During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails.

a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife.

In addition to the WMP, the operator proposes the following BMPs/COAs for wildlife:

1. The operator agrees to use hospital-grade mufflers on production equipment (or house such equipment in an enclosed structure) including compressors, pump jacks or other motors necessary to run operations at site. Mufflers will be pointed upwards to dissipate potential vibration.

2. The operator agrees to establish company guidelines to minimize wildlife mortality from vehicle collisions on roads. Slow speeds and increased awareness among employees and contractors should lessen impacts to wildlife.

3. The operator agrees to preclude the use of aggressive non-native grasses in GrSG habitat reclamation.

4. The operator agrees to utilize combustion chambers or enclosed flaring devices to eliminate open flares at this location.

5. The operator shall install and utilize bear-proof dumpsters and trash receptacles for food-related trash at all facilities that generate such trash (Rule 1204.a.1).

CPW's recommendations align with the proposed BMPs and the agreed-upon compensatory mitigation requirements that will be calculated for the proposed location per the WMP.

Elissa Slezak, November 24, 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, #6, and #12.	10/28/2019
OGLA	This Form has passed completeness.	10/24/2019
OGLA	Form returned to draft for empty datafield in wildlife tab and for verification of pre-consultation CPW meeting date. Email sent to both submitter and operator contact, from this form.	10/18/2019

Total: 15 comment(s)