OPERATIONS SAFETY MANAGEMENT PLAN

BNL | ENTERPRISE

Enterprise State 16-1 (2962)

Sec. 16 T29S R62W (NE/4 SE/4)

Las Animas County, Colorado

Surface: State

Submitted as an accompaniment to the Form 2A Application
and consistent with the requirements of Rule 602.d.

Original Submittal: April 14, 2021

Revised: June 30, 2021

Operations Management Safety Plan
Document ID No.: 001-01-01.1#

BNL (Enterprise) Inc is committed to creating and maintaining a safe working environment for staff, contractors, visitors and the wider community.

Purpose:
The purpose of this document is to provide standards which BNL (Enterprise) Inc has set to handle safety rules and policies regarding visitor and contractor site visits, site orientation and training, Emergency Response Plans, Site Inspections and Management of Change.

1. **Visitor and Contractor Site Visits**
   - 1.1. No unauthorized personnel allowed on location.
   - 1.2. Sign in and sign out procedures for all site employees, contractors and visitors including detailed safety briefing relevant to the operations at the time of the visit.
   - 1.3. Facilities will post signage for Minimum PPE for all site visitors.

2. **Site Orientation and Training**
   - 2.1. All new employees, contractors and visitors will receive a site orientation to review:
     - 2.1.1. Emergency Response Plan.
     - 2.1.2. Current operations status.
     - 2.1.3. Site specific hazards or special requirements.
     - 2.1.4. Lockout/Tagout Program (LOTO).
     - 2.1.5. Stop Work Authority.

3. **Emergency Response Plan**
   - 3.1. Local first responders will have reviewed and approved the Emergency Response Plan (**ERP**)
   - 3.2. Approved ERP will be posted with local first responder and EMS contact phone numbers in common area or safety meeting room.
   - 3.3. ERP will be reviewed annually by site manager.

4. **Site Inspections**
   - 4.1. Site will have regular inspection for leaks or potential leaks.
   - 4.2. Site management will sanction and conduct “Hazard Hunts” to reinforce the team’s commitment to improving and maintain a safe work environment.

Operations Management Safety Plan
Document ID No.: 001-01-01.1#

5. Management of Change (MOC) Procedure

The MOC Procedure applies to changes in facilities, equipment, and procedures as well as changes in operating personnel. All changes, whether planned to be permanent, temporary or in the case of an emergency, shall be subject to the MOC Procedure.

5.1. MOC Procedure includes, but is not limited to:

- 5.1.1. Facility modifications resulting in changes to P&ID, structural support, layout or configuration.
- 5.1.2. New tie-ins to existing facilities.
- 5.1.3. Any facility modifications to increase capacity or accommodate different produced fluids.
- 5.1.4. Significant changes to operating conditions.
- 5.1.5. Equipment changes or replacements that are not “in kind”.
- 5.1.6. Bypass connections around equipment normally in service.
- 5.1.7. Changes to operating procedures, utility connections, process chemicals or agents.
- 5.1.8. Significant changes in qualifications, training and/or experience of site personnel.

5.2. **MOC Procedure Initiation**

- 5.2.1. Whenever these changes are planned or if they occur out of operational necessity, the MOC procedure is implemented prior to the change via the MOC Form. The MOC form will serve as the standard document of record for the Management of Change Procedure.
- 5.2.2. The initiator of the change describes the change requested and the reason for the change. Start and end dates (if applicable) and other details will be identified.
- 5.2.3. An assessment of the risks and hazards will be completed with input from personnel appropriate to the nature of the change requested. Management and mitigation actions where appropriate will be identified and recommended for approval along with the change request.
- 5.2.4. During the Initiation process, the type of change will be classified as:
  - 5.2.4.1. Emergency Change
    - 5.2.4.1.1. A change that should be implemented immediately.
    - 5.2.4.1.2. Without the change, harm to personnel, process or the environment is probable.
  - 5.2.4.2. Planned Change
    - 5.2.4.2.1. Any non-emergency and non-standard change.

5.2.4.2.2. Requires scheduling and detailed planning.

5.2.4.3. Standard Change

5.2.4.3.1. Routine and common change.

5.2.4.3.2. Considered low/no risk or minimal impact.

5.3. **Managing an Emergency MOC**

5.3.1. An emergency MOC is any change that requires quick initiation and implementation for safety or environmental reasons if the Emergency Response Plan is in effect.

5.4. The onsite PIC has the authority to review and directly approve a change for implementation and startup in response to an Emergency. As soon as possible after the emergency response situation is under control, the MOC procedure will be completed.

MOC Form

Will be filled out by the initiator with the following guidelines:

5.4.1. **Identify Proposed Change Type**

5.4.1.1. **Process** – add, subtract, or alter order of operations.

5.4.1.2. **Equipment** – replacement does not function or operation the same as the original.

5.4.1.3. **Procedure** – steps or instructions have been revised.

5.4.1.4. **Facility** – combination of types is changing (such as equipment and procedure).

5.4.1.5. **Personnel** – Significant changes in qualifications, training and/or experience of site personnel.

5.4.2. **Classification of Change**

5.4.2.1. **Emergency Change**

5.4.2.1.1. A change that should be implemented immediately.

5.4.2.1.2. Without the change, harm to personnel, process or the environment is probable.

5.4.2.2. **Planned Change**

5.4.2.2.1. Any non-emergency or non-standard change.

5.4.2.2.2. Required scheduling and detailed planning.

5.4.2.3. **Standard Change**

5.4.2.3.1. Routine and common change.

5.4.2.3.2. Considered low/no risk or minimal impact.

5.4.3. **Risk Assessment**

5.4.3.1. The MOC Risk assessment must be completed by at least 2 persons with training and experience appropriate to the change being requested.

5.4.3.1.1. Performing risk assessment is essential to determine any potential hazards/impacts that the change may directly or indirectly cause to public health, safety, welfare, or the environment.

5.4.3.1.2. All hazards are to be evaluated.

5.4.4. **Hazard & Risk Control**

5.4.4.1. Determine if risks are preventable.

5.4.4.2. Risks deemed manageable will require a hazard control classification.

5.4.5. **Evaluate Making the Change**

5.4.5.1. Analyze the change by weighing the benefits to any increase in safety and hazard risk.

5.4.5.2. Any proposed change may be approved or rejected on this evaluation.

5.4.6. **Approval Process**

5.4.6.1. Before a change is implemented (other than in an emergency), approvals must be given by the change initiator and both operations and technical functions - the Operations Manager and either the Facilities or Planning Engineer (as appropriate).

5.5. **Implementation**

5.5.1. Once a MOC has been approved, the Operations Manager will undertake a PSSR for any non-standard change.

5.5.2. The onsite PIC will ensure the PSSR checklist is completed prior to implementing the change (other than in an emergency). This checklist will include making affected personnel aware of the change and completing any necessary training.

5.5.3. If the change is temporary, the PSSR checklist will be completed when the temporary change is scheduled to return to original conditions. If the temporary change is to be made permanent, the MOC process must be restarted.

5.6. **MOC Recordkeeping**

5.6.1. A copy of the MOC Form and the PSSR checklist will be kept onsite at the facility for 2 years from the date of completion.

5.6.2. Written request for records, by regulatory agencies, will be complied or addressed in 5 business days.

Management of Change

BNL
(Enterprise) Inc

I. General Information

Change Title: | Submission Date:

Change Description

Reason for Change

II. Responible Parties

Change Initiator: | Tech Rep: | Ops Leader:

III. Change Details

Change Type: | Change Class:

Change Duration:

Facility Affected:

Equipment or System Affected

IV. Hazard Analysis

Lead By: | Tech Rep 1: | Tech Rep 2:

Analysis Overview

V. Start-Up/Rollout Plan

Created By: | Approved By:

Plan Overview

VI. Final Disposition

MOC Disposition: | Disposition Date:

Comments or Conditions

Final Approver:

Signature: _____

BLN Enterprises

Management of Change Checklist

1	Does the change require safety information to be gathered or updated? *If yes, why?*	Yes
2	Does the change require a process hazard analysis to be performed?	No
3	Does the change require operations procedures to be created or updated?	
4	Does the change require different PPE to be used in this area?	
5	Does the change require employees to be trained?	
6	Does the change require contractors, vendors, or service providers to be trained?	
7	Does the change require the training policy to be updated?	
8	Does the change require the LOTO policy to be updated?	
9	Does the change require a mechanical integrity inspection to be performed?	
10	Does the change require a compliance audit to be performed?	

Change Type	Change Class	Disposition	Duration	Checklist
Process	Emergency	Waiting on Information	Permanent	Yes
Equipment	Planned	Approved	Temporary	No
Procedure	Standard	Approved w/ Conditions		N/A
Facility		Rejected		

Duration
Days
Weeks
Months
Years

Pre-Start-up Safety Review (PSSR)
Document ID No.: 001-02-01.1#

BNL (Enterprise) Inc. ("Enterprise") is committed to creating and maintaining a safe working environment. This document provides the standards that Enterprise has set to start up new or modified equipment.

Purpose:
The purpose of this document is to provide a final review process to confirm the safety management process has adequately addressed changes made to a facility prior to start-up or restart of the facility. Review of the design changes and actual construction must be included in this process. A PSSR is not a Management of Change (**MOC**), it is the verification that the MOC was completed as prescribed, and the facility or process is safe to start-up and operable.

A PSSR provides the last opportunity for the team associated with a project to ensure the possibility of an unsafe condition does not exist before the process goes into operation and/or potentially hazardous chemicals are introduced. In addition, it enables the team responsible for the design, operation and maintenance of the process, including facility management, to check — before starting up — that effective procedures have been written and the operators and maintenance personnel have been trained on the process.

1. **When needed** – a PSSR is a step in the MOC process and is required for most MOC projects. Additionally, a PSSR can be required even if an MOC was not required. PSSRs should be conducted for the following triggering events:
   1.1. New Capital Projects
   1.2. Modifying or Upgrading Process Equipment and Valves
   1.3. New or Modified Control System
   1.4. After an emergency shut-down due to an investigable event
   1.5. After a prolonged period of equipment outage
   1.6. Any other instance determined by the Operations Manager or Site Supervisor

2. **Who should conduct** – a PSSR will be executed by a multi-disciplined team. This team should be led by the Operations Manager (or delegate) and include individuals with authority and experience in relevant engineering, operations, construction, and safety. Use third-party contractors if necessary, for specialist expertise or advice on the equipment or process under review.

3. **Steps of the PSSR Process** – after the need for a PSSR is established and the PSSR team has been created, the team should:
   3.1. Meet to review the following:
      3.1.1. Project Design Plans & Scope

3.1.2. Construction Reports & Inspection Documents
3.1.3. Approved MOC Form & Checklist (Document ID No.:001-02-01.2#)

3.2. Each team member is required to have detailed knowledge of and/or visit the facility.
3.3. Create the PSSR Checklist
3.3.1. Create a "punch list" for items identified as needing further action using the construction procedures and MOC form.
3.3.1.1. Before the facility is ready for start-up
3.3.1.2. After start-up has taken place
3.3.2. Punch list will be created utilizing operational procedures as a guide and will include, but not limited to:
3.3.2.1. Function test requirements
3.3.2.2. Pressure test requirements
3.3.2.3. Field calibration
3.3.2.4. Installation of required signage and safety guards
3.3.2.5. Operational and Safety Training requirements
3.3.3. Punch list will identify the person(s) responsible for action.
3.3.4. PSSR Team is responsible for tracking and verifying action status on punch list.
3.3.5. Final Approval – PSSR approval should be made by the Operations Manager (or delegate).

Recordkeeping

4.1 A copy of the PSSR checklist (Document ID No.:001-02-01.2#) will be kept onsite at the facility for 2 years.
4.2 Records will be produced upon request in 3-5 business days.

BNL Enterprise LLC **Document ID No.: 001-02-01.2#**

Pre-Startup Safety Review Verification Form

Facility Information:

Name: BNL Enterprise LLC .	
Address:	
New Facility: ☐	Modified Facility: ☐
If new facility, assign PSSR #:	If modified facility, reference MOC #:

Scope of Work:

Verification Sign-Off:

Requirement	YES	NO	N/A	Name/Title	Signature	Date
1) All process safety information has been compiled and is complete, current, and accurate. The information is accessible to the employees.						
2) The process hazard analysis is complete for all new facilities, and the management of change has been completed for all modified facilities. The specific requirements of these elements have been completed satisfactorily.						
3) All safety procedures have been developed, or modified and are implemented, Mechanical guards are in place and LOTO procedures						
4) All operators and personnel for facilities trained informed of general operations for whole facility.						
5) All maintenance procedures have been						
6) All emergency action procedures have been developed, or modified, and are implemented.						
7) Construction and equipment is in accordance with the design specifications. All safety equipment is in place.						
8)Has all equipment been pressure tested and calibrated. Have all emergency shut down valves been tested and are operational						
9) Training has been completed for all employees that are required to respond to emergencies involved in the process.						

Approval to Startup Process:

Signature indicated that all pre-startup safety review items are completed. The approval for startup must be on or before the new or modified system was placed in service.

Name: Title: Signature:	Date:
Name: Title: Signature:	Date:

Follow-up Items:

List any follow-up items which were not completed prior to system startup, the reason that the item has not been completed (in the Comment column and fill in due date and the date they are completed. The individuals who are authorized to approve the startup should ensure that the modified system is safe to startup even though these items have not been completed, i.e. the follow-up items should have no impact on system safety.

Follow-up Items	Comment	Due Date	Date Completed

2.3. Isolate the energy source.
    2.3.1. Ensure the energy source is deenergized.
2.4. Lock and tag energy source(s)
    2.4.1. Install lock or suitable method to ensure energy source cannot be reenergized without removal of the lock or clear signs of tampering.
    2.4.2. Securely fix a tag to communicate the equipment or machinery is not to be operated.
2.5. Test effectiveness of lock out.
    2.5.1. Intentionally attempt to start or engage equipment or machinery, by normal means, to ensure alternate energy supply or trapped energy cannot cause inadvertent equipment startup or release of energy.

3. Lock Out

3.1. Lockout devices
    3.1.1. Must be approved by facility manager as a suitable lockout device and standardize whenever possible.
    3.1.2. Must be placed on the energy isolation device by an LOTO trained Enterprise employee or authorized contractor.
    3.1.3. When installed, must ensure the energy isolation device physically cannot be engaged.
    3.1.4. Can only be removed by the person which installed it after completion of the maintenance or service, or upon being relieved of those duties.
3.2. Installation of lockout device(s)
    3.2.1. Should be installed by each authorized person working on the locked-out equipment or machinery prior to servicing or maintenance of machines and equipment.
    3.2.2. If the multiple devices are required on the energy isolation device, a group locking device must be used. This special device should ensure that the energy isolation device cannot be reenergized until all locking devices have been removed independently.
    3.2.3. When relieving an employee from their duties, the relieved employee's lock should be replaced with the lock of the relieving employee's.
3.3. Removal of lockout device(s)
    3.3.1. Each lockout device should be removed by the authorized employee or contractor who installed the lockout device.
    3.3.2. When relieving an employee from their duties, the relieved employee's lock should be replaced with the lock of the relieving employee's.
3.4. Removal of other authorized employee(s) lockout device(s)

3.4.1. The facility manager must verify that the authorized employee, who installed the lockout device, is not at the facility.
3.4.2. The facility manager must make a reasonable effort to contact the authorized employee to inform them that their lockout device is planned to be removed and discuss any concerns.
3.4.3. Steps must be taken to ensure safe startup of equipment or machinery by means of:
3.4.3.1. Equipment or machinery process review
3.4.3.2. Testing of equipment or machinery in a controlled environment
3.4.4. The facility manager must ensure that the authorized employee has been informed that their lockout device has been removed before the employee resumes work at that facility.

4. Tag Out

4.1. Tagout devices
4.1.1. Must be approved by facility manager as a suitable tagout device.
4.1.2. Must be filled out and placed on the energy isolation device by an LOTO trained Enterprise employee or authorized contractor.
4.1.3. Can only be removed by the person which installed it after completion of the maintenance or service, or upon being relieved of those duties.

4.2. Filling out the tag
4.2.1. The information written on the tag must be legible and should include:
4.2.1.1. Name of Authorized Employee or Contractor
4.2.1.2. Title of Authorized Employee or Contractor
4.2.1.3. Signature of Authorized Employee or Contractor
4.2.1.4. Estimated completion date
4.2.1.5. Brief explanation of the reason the tag out is required.

4.3. Installation of tagout device
4.3.1. Should be installed by each authorized person working on the tagged-out equipment or machinery prior to servicing or maintenance of machines and equipment.
4.3.2. When relieving an employee from their duties, the relieved employee's tag should be replaced with the tag of the relieving employee's.

4.4. Removal of tagout device(s)
4.4.1. Each tagout device should be removed by the authorized employee or contractor who installed the tagout device.
4.4.2. When relieving an employee from their duties, the relieved employee's tag should be replaced with the tag of the relieving employee's.

4.5. Removal of other authorized employee(s) tagout device(s)

4.5.1. The facility manager must verify that the authorized employee, who installed the tagout device, is not at the facility.

4.5.2. The facility manager must make a reasonable effort to contact the authorized employee to inform them that their tagout device is planned to be removed and discuss any concerns.

4.5.3. The facility manager must ensure that the authorized employee has been informed that their tagout device has been removed before the employees resumes work at that facility.

5. **Lock Out Tag Out Training**

5.1. Trainers – Enterprise shall ensure that trainers have been trained and made available to conduct various levels of LOTO training.

5.2. Authorized Employee and Contractor training

5.2.1. Company LOTO Policy

5.2.2. Facility specific LOTO Procedures which will detail the unique energy isolation and communication requirements.

5.3. Affected Employee and Contractor training

5.3.1. Company LOTO Policy

5.4. Visitor training

5.4.1. A visitor to a facility is not required to complete LOTO training. However, the facility orientation should review the LOTO program and any active LOTOs.

5.5. Facility manager is required to ensure that the training guidelines are met.

6. **Policy Audit**

6.1. All LOTO procedures must be reviewed every 12 months by the Operations Manager and Facility Manager.

6.2. Authorized Employees and Contractors must review procedures every 12 months.

EMERGENCY RESPONSE PLAN

BNL | ENTERPRISE

Enterprise State 16-1 (2962)

Sec. 16 T29S R62W (NE/4 SE/4)

Las Animas County, Colorado

Surface: State

Submitted as an accompaniment to the Form 2A Application
And consistent with the requirements of Rule 602.j.

Original Submittal: April 14, 2021

Revised: June 30, 2021

UPSTREAM
Petroleum Management, Inc.

TABLE OF CONTENTS

From: Dave B
To: Agross@upstreampm.com
Subject: Re: Helium Drilling Emergency Response Plan
Date: Monday, April 5, 2021 9:32:54 AM

Just talked with the Chief out at Pinion Canyon. He says it looks to good him as well.

Sent from my iPhone

> On Apr 5, 2021, at 08:12, agross@upstreampm.com wrote:
>
> Hi Dave,
> Just checking to see if Pinion Canyon had any comment on the plan.
>
> Thanks,
> Andrea
>
> ---
>
> **From:** Dave B <dbmedic@hotmail.com>
> **Sent:** Thursday, March 25, 2021 10:23 AM
> **To:** Agross@upstreampm.com
> **Subject:** Re: Helium Drilling Emergency Response Plan
>
> This looks good to me. I am having pinion canyon review it and see it it works for their needs. Will let you know when I hear back from them.
>
> Sent from my iPhone
>
> > On Mar 23, 2021, at 17:52, agross@upstreampm.com wrote:
> >
> > Hi Dave,
> > I have prepared the Emergency Response Plan for BNL (Enterprise) Inc. We will be submitting the Colorado State oil and gas permit as well as the Las Animas County permit in the next week or so. Per the state and county regulations we are required to have the responding Fire Department approve of our plan. Please let me know if you have any questions or would like to set up a conference call with the team as well as the Pinon Canyon Maneuver Site, as you told me they would most likely be the team to respond to our location in Las Animas County.
> >
> > We appreciate your time and assistance.
> >
> > Thank you,

APPROVAL SIGNATURE

BNL (Enterprise) Inc's Emergency Response Plan was approved on_____by the responding Hoehne Fire Protection District and the Piñon Canyon Maneuver Site to provide emergency cover at the Enterprise State 16-1 (2962) location in Las Animas County, Colorado.

BNL (Enterprise) Inc.

Name	Title	Signature	Date

Hoehne Fire Protection District

Name	Title	Signature	Date

Piñon Canyon Maneuver Site

Name	Title	Signature	Date

SECTION 2 - SITE SPECIFIC INFORMATION

a. Site Safety Requirements and General Information

The minimum personal protective equipment (PPE) to enter any BNL (Enterprise) Inc. location includes hard hat, safety glasses, safety toe boots, and fire-resistant clothing (FRC). All contractors and visitors are responsible for providing their personnel/employees/persons with the appropriate training on and use of PPE while on all BNL (Enterprise) Inc. locations and signage will be in place to disclose this information at the entrance to location. In addition, all personnel entering a BNL (Enterprise) Inc. location must understand and abide by BNL (Enterprise) Inc.'s contractor expectations relating to environmental, health, and safety requirements.

The primary hazards that any person must be aware of while on a BNL (Enterprise) Inc. location include, but are not limited to, the potential for release of gases and/or liquids from production equipment/tanks, heavy truck and equipment traffic, loud noise, high pressures, and the potential for a flash fire. These hazards can vary depending on the work being performed.

b. Emergency Muster/ Assembly Points/ Ingress and Egress

Muster Point: The Operator will designate primary and secondary muster areas at the Location. In the even of an evacuation, all personnel on-site will immediately evacuate and move to the primary muster area. If the primary muster area is unsafe, personnel will move to the secondary muster area. During evacuations, personnel will avoid taking shortcuts that create exposure to hazards.

Ingress and Egress: Employees and contractors must maintain locations so that routes of egress from building, discharge areas, access roads and other means of emergency egress and access are properly maintained.

Please see the Tactical Response Plan for details on these points.

c. 911 Address and GPS Coordinates

Legal Description – NESE Section 16 T29S R62W

Directions: Wellsite is ±23 miles from the intersection of I-25 and County Road 60.

Take Exit 34 off I-25 onto County Road 60. Head east ±10 miles to County Road 75. Head north ±2 miles to County Road 64. Head east on County Road 64 ±2 miles to County Road 79. Head north on County Road 79 for ±0.5 miles to County Road 64.8. Follow County Road 64.8 ±8.5 miles to the access road for the Enterprise State 16-1 (2962) wellsite.

Lat/Long: Lat: 37.51829^{o}N Long: -104.33747^{o}W

d. Site Description

The Location is located in rural Las Animas County, Colorado. The surrounding land uses are rangeland and agriculture. There are no Residential Building Units within 2,000' of the Location. The Location is accessed from a private access road off County Road 64.8.

The Enterprise State 16-1 (2962) Pad is a BNL (Enterprise) Inc. Helium Wellpad and Helium Production Facility. The Helium Production Facility consists of four (4) tube trailers, one (1) 400 barrel produced water

tank, one (1) Separator, one (1) gas or diesel motor, one (1) Dehydrator, ten (10) electric motors, one (1) fuel tank, four (4) gas compressors and possibly one (1) electric generator located inside a lined secondary containment structure. Please see Facility Diagram in Section 3.

e. Nearby School and High Occupancy Building Units

There are no schools, High Occupancy Building Units or Residential Building Units within 2,000' of the Location. Please see Location Drawing in Section 3.

f. Nearby Sensitive Areas

The closest High Priority Habitat, Apishapa River, is over 2,000' from the Location and will not be impacted by a spill.

g. Location of SDS sheets, Sign-In Sheets, JSAs and Safety Forms

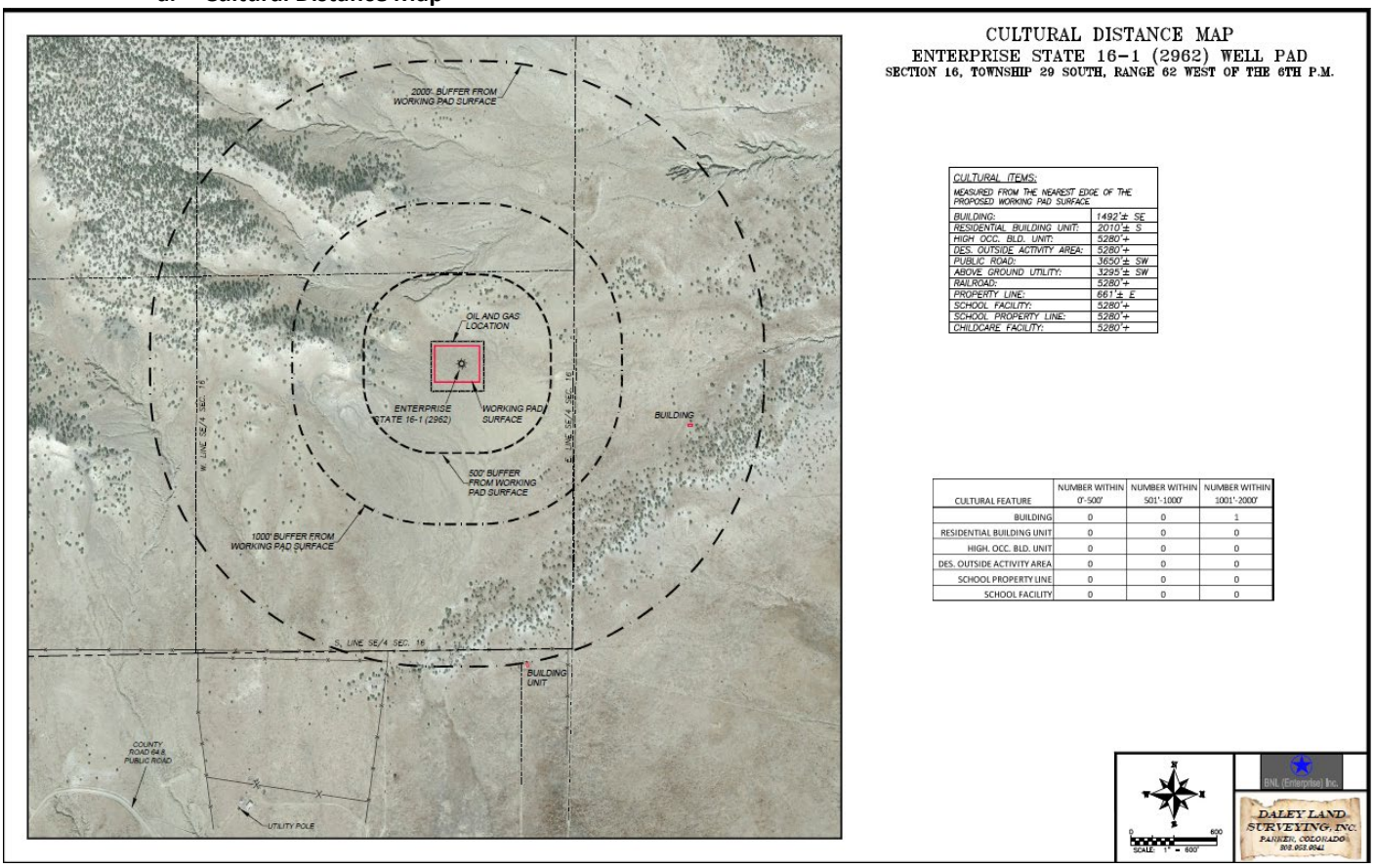
Depending on the operations taking place on location, the chemicals that may be present will vary. Regardless, hazard communication is a critical safety measure and Material Safety Data Sheets (MSDS) will be available from the Company Representative present or the contractor performing work on location.

During drilling, completion, and facility installation activities all employees and approved visitors to the Enterprise State 16-1 (2962) will be required to check in at the company man trailer where they will be required to sign in and will be provided with a detailed safety briefing of current operations and all safety precautions that must be adhered to while on location. In addition, all who enter the location must also sign out upon their departure. Site Supervisor are required to account for all persons entering or leaving location during active operations and in the event of an incident.

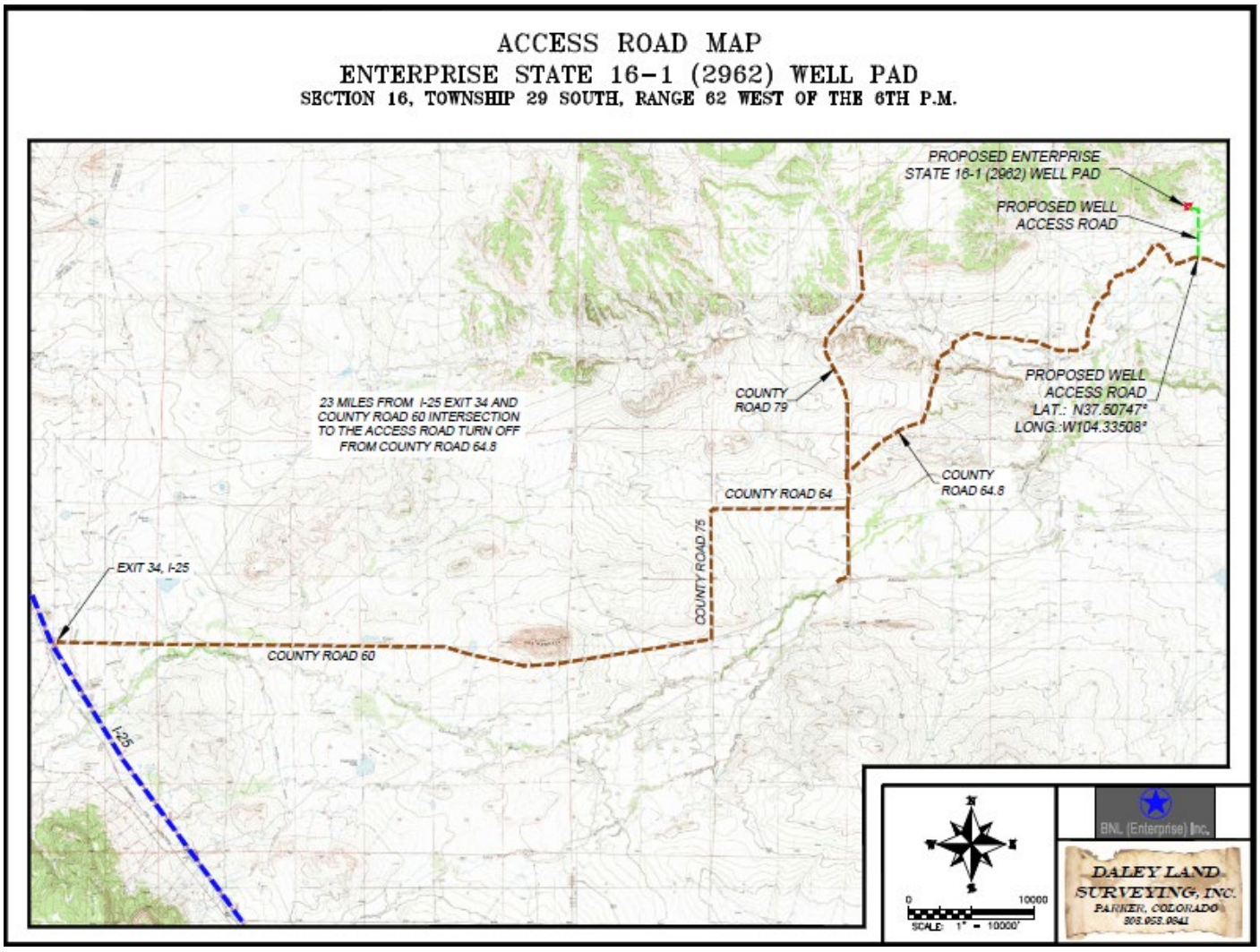
Once drilling, completion, and facility installation activities are finalized, the site will transition to its production phase. No unauthorized personnel will be allowed on location without first contacting a company representative. At this point, the primary chemicals stored on site will be compressed helium in tube trailers and fuel for local power generation.

SECTION 3 – MAPS AND DIAGRAMS

a. Cultural Distance Map



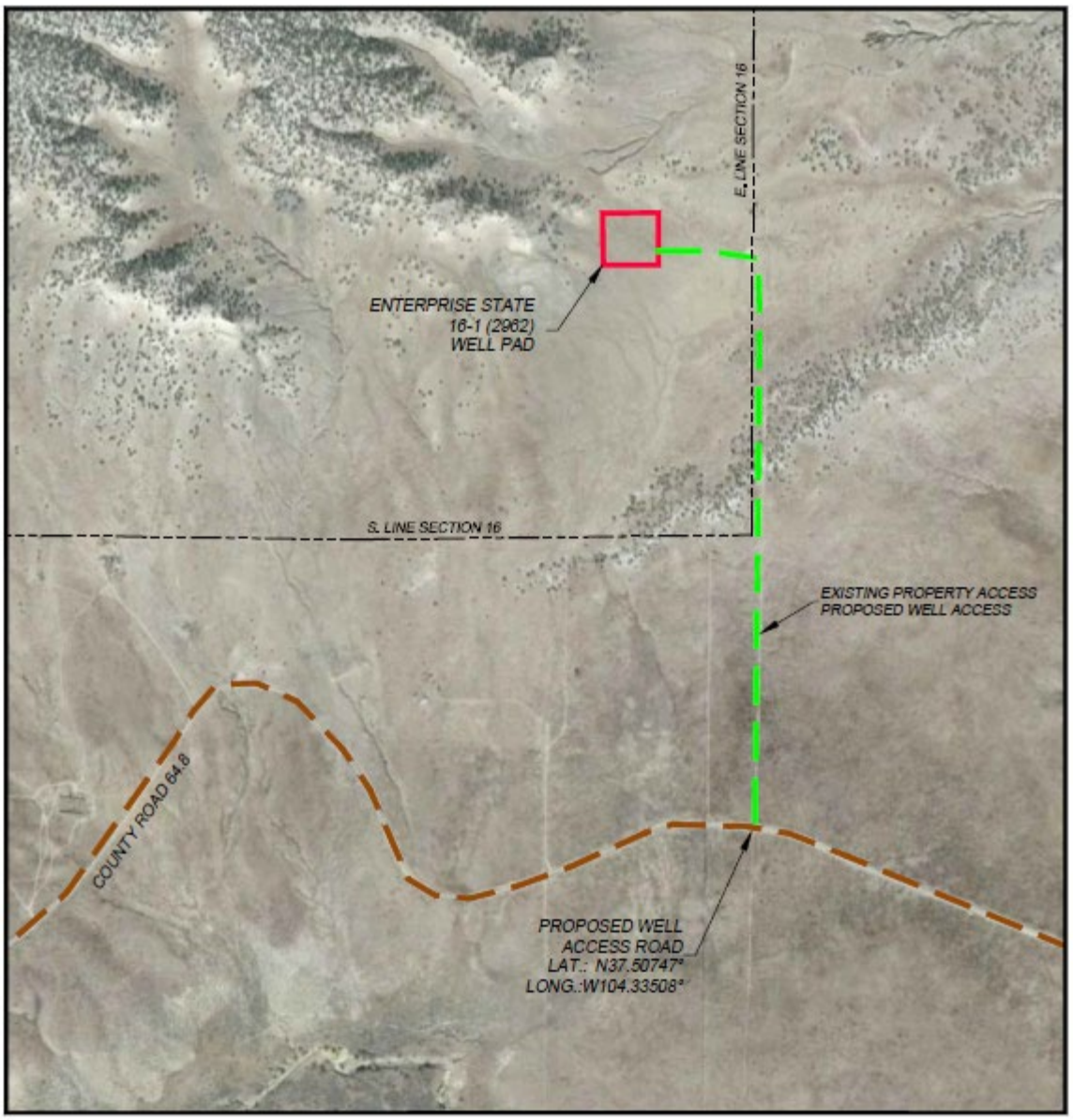
b. Access Road Maps



ACCESS ROAD MAP

ENTERPRISE STATE 16-1 (2962) WELL PAD

SECTION 16, TOWNSHIP 29 SOUTH, RANGE 62 WEST OF THE 6TH P.M.



0 1000

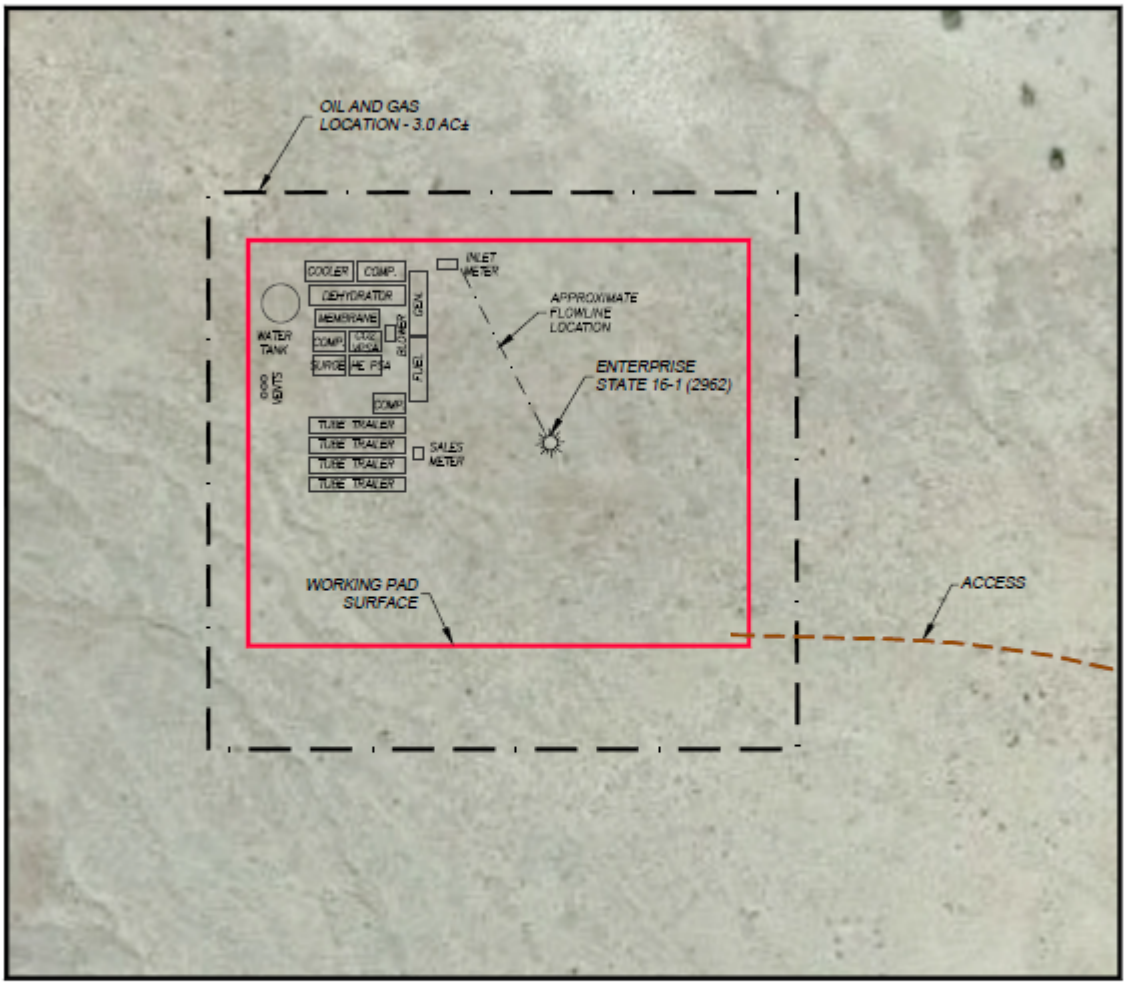
SCALE: 1" = 1000'

BNL (Enterprise) Inc.

DALEY LAND SURVEYING, INC.
PARKER, COLORADO
303.953.9841

c. Facility Layout Diagram

FACILITY LAYOUT DRAWING
ENTERPRISE STATE 16-1 (2962) WELL PAD
SECTION 16, TOWNSHIP 29 SOUTH, RANGE 62 WEST OF THE 6TH P.M.



CULTURAL ITEMS: MEASURED FROM THE NEAREST EDGE OF THE PROPOSED WORKING PAD SURFACE	
BUILDING:	1492'± SE
RESIDENTIAL BUILDING UNIT:	2010'± S
HIGH OCC. BLD. UNIT:	5280'+
DES. OUTSIDE ACTIVITY AREA:	5280'+
PUBLIC ROAD:	3650'± SW
ABOVE GROUND UTILITY:	3295'± SW
RAILROAD:	5280'+
PROPERTY LINE:	661'± E
SCHOOL FACILITY:	5280'+
SCHOOL PROPERTY LINE:	5280'+
CHILDCARE FACILITY:	5280'+

N W E S

0 100

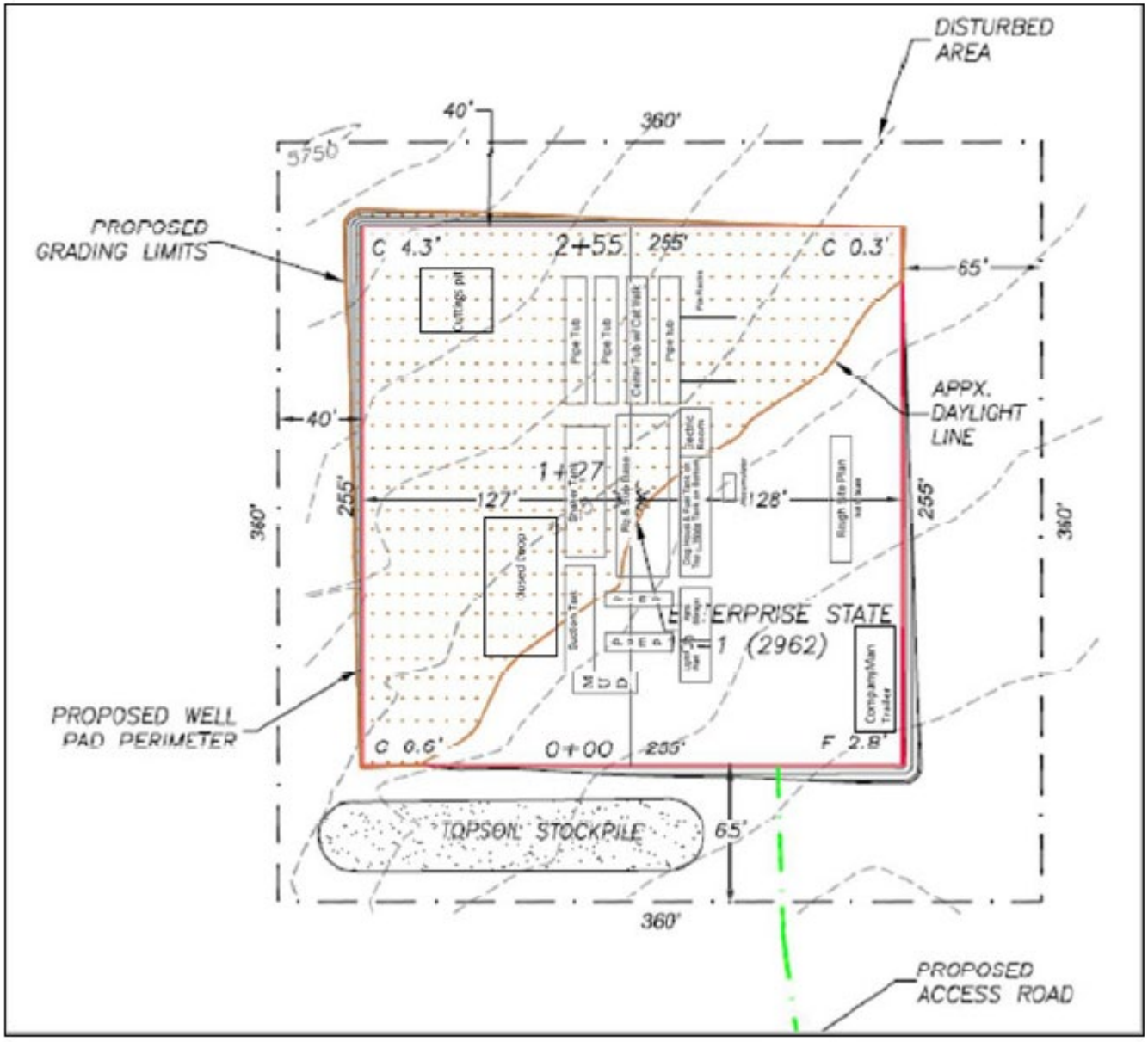
SCALE: 1" = 100'

BNL (Enterprise) Inc.

DALEY LAND SURVEYING, INC.
PARKER, COLORADO
303.953.9841

d. Rig Layout Diagram

Enterprise State 16-1 (2962)
Rig Layout Diagram



EMERGENCY CONTACTS

a. BNL (Enterprise) Inc.

Name	Title	Office Number	Cell Phone
Trent Spry	Corporate Contact		tspry@bluestarhelium.com
Ross Warner	Legal		rwarner@bluestarhelium.com
Kristen Stocks – Stocks Consulting	EH&S & Safety		307-200-1930
Andrea Gross – Upstream Petroleum Management Inc.	Community & Public Relations	303-942-0506	720-339-4277
24 Hour Emergency Phone Number: 303-632-0160			

b. First Responders

Name	Staffing	Emergency Number	Dispatch Phone
Hoehne Fire Protection District	Volunteer	911	719-695-0810
Piñon Canyon Maneuver Site	Volunteer	911	
Las Animas County Sheriff	Full Time	911	719-846-2211
Colorado State Patrol	Full	911	
Flight for Life Colorado			

c. Regulatory Contacts

Name	Office Number	Cell Phone
COGCC	303-894-2100	None
CDPHE	877-518-5608	None
CPW	303-291-7227	None
National Response Center	800-424-8802	None

d. Medical Facilities

Name	Office Number	Location
Spanish Peaks Hospital	719-323-5642	Walsenburg, CO (Level IV Trauma Center)
San Rafael Hospital	719-846-9213	Trinidad, CO (Level IV Trauma Center)
St. Mary-Corwin Medical Center	800-228-4039	Pueblo, CO (Flight for Life location)

e. Spill Response Organization

Name	Office Number	Cell Phone
Stocks Consulting	303-632-0160	

f. Fire, Explosion, associated with loss of well control

Name	Emergency Number	Dispatch Phone
Hoehne Fire Protection District	911	719-695-0810
Piñon Canyon Maneuver Site	911	
Office of Emergency Management		719-845-2566

g. Local Government Contacts

Name	Title	Cell Phone
Robert Lucero	Las Animas LGD	719-845-2577
Kim Chavez	Office of Emergency Management	719-845-2566

SPILL RESPONSE AND REPORTING

a. Spill Response

This Location will not produce or encounter any hydrocarbons. Most common release will be unrefined produced water. Refined petroleum products such as diesel, gasoline, and motor oil spills are less common, but still equally important to mitigate. If a spill is found reportable, it will be mitigated in accordance with Colorado Oil and Gas Conservation Commission (COGCC) and Colorado Department of Public Health and Environment (CDPHE) guidelines.

Once a release has been identified, it will be immediately stopped and contained if possible and is safe to do so. When containing a spill; pig blankets, snakes, absorbent materials, or earthen berms will be constructed around the release to keep material from spreading. These materials will be provided by a contract company and kept on-site. Diligent efforts will be made to minimize contact with live vegetation or open water if release is outside of secondary containment structures.

In the event of a large incident requiring outside assistance, BNL (Enterprise) Inc. has contracted with Stocks Consulting. Stocks Consulting who possesses a working knowledge of oil and gas operations, emergency response and Incident Command. Once notified Stocks Consulting personal can be on location with 12 hours.

b. Spill Reporting

What determines a reportable spill and to whom does the report go?

A spill/release will be reported to the COGCC if released material is property of BNL (Enterprise) Inc. and meets the COGCC reporting thresholds (see below), an example would be produced water from a water vault.

A spill/release will be reported to the CDPHE if released material is in the custody of a third party for spills that meet CDPHE reporting thresholds, are of any size that impact or threaten to impact waters of the state, a residence or occupied structure, livestock or public byway. An example would be a water hauler over filling a truck and spills product onto the ground next to a flowing irrigation ditch.

Once a spill is determined reportable, there is a 24-hour deadline to make initial notification to the COGCC or CDPHE depending on product ownership. Spills/releases in the custody of BNL (Enterprise) Inc. will be reported by a Company representative. Spills/releases in the custody of a third party will be reported by the responsible company's EHS Department to the appropriate agency and to BNL (Enterprise) Inc. These regulatory guidelines will be strictly followed by BNL (Enterprise) Inc. and any contractors operating under BNL (Enterprise) Inc. guidance during all activities at the Enterprise State 16-1 (2962).

EVACUATION INFORMATION

a. Evacuation Plan Procedures

The procedure to be used in alerting nearby persons in the event of any occurrence that could pose a threat to life or property will be arranged and completed with public officials in detail.
In the event of an actual emergency, the following steps will be immediately taken:

1. The BNL (Enterprise) Inc. representative will immediately notify proper authorities, including the sheriff's office, highway patrol, and any other public officials as described above and will enlist their assistance in warning residents and transients in the calculated radius of exposure.
2. The BNL (Enterprise) Inc. will coordinate with local authorities to warn residents' down-wind of the location and within radius of exposure from the well site. Additional evacuation zones may be necessary as the situation warrants.
3. The BNL (Enterprise) Inc. representative will coordinate with appropriate emergency personnel to divert traffic in the vicinity away from the potentially dangerous area. No trespassing and warning signs will be posted at the entrance to the well site. The contract company will monitor essential and non-essential traffic on-site.

General:

1. The area included within the radius of exposure is considered to be the zone with the maximum potential hazard. When it is determined that conditions exist which create an additional area (beyond the initial zone of maximum potential hazard) vulnerable to possible hazard, public areas in the additional hazardous area will be evacuated.
2. In the event of a disaster, after the public areas have been evacuated and traffic stopped, it is expected that local civil authorities will have arrived and within a few hours will have assumed direction of and control of the public, including all public areas. BNL (Enterprise) Inc. will cooperate with these authorities to the fullest extent and will exert every effort by careful advice to such authorities to prevent panic or rumors.
3. BNL (Enterprise) Inc. will dispatch appropriate personnel to the disaster site as soon as possible. The company's personnel will cooperate with and provide such information to civil authorities as they might require.

COORDINATION WITH FIRST RESPONDERS

In the event of an emergency requiring First Responders, Unified Command will be established between the BNL (Enterprise) Inc. appointed company man on location and First Responders present. Unified Command post will be established based on conditions present at time of incident.

Due to the remote location, the Site Supervisor will contact Hoehne Fire Protection District. However, the Piñon Canyon Maneuver Site will most likely be the responding Fire District.

INCIDENT TYPES

a. Loss of Well-Control

What is it?

"Loss of well-control" means the uncontrolled flow of formation or other fluids from an exposed formation (an underground blowout) or at the surface (a surface blowout), flow through a diverter or uncontrolled flow resulting from a failure of surface equipment or procedures.

What are the unique response procedures?

The Operator will contact well-control personnel to reestablish control of the well. Reference the emergency contact list for well-control contractor contact information. The Operator personnel and contractors will take all reasonable measures to manage loss of well-control based on the level of training, knowledge and skills while waiting for arrival of well-control specialists. At a minimum, personnel will maintain positive scene control and security.

What are the unique reporting requirements?

Loss of well-control typically require emergency reporting at the local level to ensure the local authorities are notified (call 911). Additional reporting requirements are related to whether or not petroleum products are released into the environment and other COGCC rules.

b. Explosion

What is it?

Explosions include the rapid destruction of separators, tanks or any type of equipment as result of over-pressurization and the subsequent failure of pressure relief devices, regardless of cause. This includes boiling liquid expanding vapor explosions (BLEVE).

A BLEVE is an explosion caused by the rupture of a vessel containing a pressurized liquid above its boiling point. There is a possibility of a BLEVE at the storage tanks on location as well as any other vessel capable of holding pressure and fluid. A BLEVE caused from a vessel containing oil can result in a secondary explosion of the Volatile Organic Carbon's (VOC) released into the atmosphere.

What are the unique response procedures?

Establish an initial evacuation and isolation zone immediately and prevent access. Maintain scene security until additional resources arrive who will take over. Established hot and warm zones must be expanded as is necessary. Muster areas may require moving from their designated locations. Evacuation of surrounding areas may be indicated. The on-scene supervisor will immediately communicate suggested evacuations of the surrounding area to authorities as needed.

What are the unique reporting requirements?

Immediately notify emergency services to the fire's type, approximate size and rate of spread. Additional reporting may be required if the explosion is accompanied by the release of a hazardous material.

c. Injury or Illness, regardless of cause

Any injury or illness to persons on location. This is to include all medically based and toxic exposure-based illnesses and injuries.

What are the unique response procedures?

EMS will need to be given as much information regarding the illness or injury before they arrive. Also, first aid trained employees may render assistance, and require equipment to do so, until EMS arrives. Due to the remote location, Flight for Life maybe the best option for transportation to the nearest and most capable medical facility. See contact information for medical facilities.

What are the unique reporting requirements?

Any injury or illness that results in an inpatient hospitalization, amputation or eye loss must be reported to OSHA within 24-hours. Any work-related fatality must be reported to OSHA within 8-hours. Contact the emergency coordinator if any employee or contractor is injured while working.

d. Fire Associated with Well

What is it?

This includes any fire that is associated with the wellhead or wellbore directly. Fires in this category can also include equipment, such as a coil rig, that is temporarily connected directly to the wellbore. This does not include fires that are isolated to equipment on location or the location itself that does not pose a threat directly to the well.

What Are the Unique Response Procedures?

Isolate equipment to the extent it can be safely done. Isolate the location. Maintain positive scene control.
What Are the Unique Reporting Requirements?

Emergency services should be notified immediately and the type, approximate size and rate of spread of the fire disclosed to dispatch.

e. Vehicle Crash on Location

Any incident on location that involves the collision of a vehicle with another vehicle or piece of equipment to include the wellhead itself. The vehicle does not have to be determined inoperable to meet this definition. This also is to include all heavy equipment that may be found on location. Such as backhoes, skid steers, cranes, loaders, etc.

What are the Unique Response Procedures?

Care should be taken to de-energize any lines or equipment including the vehicle that is involved in the incident to reduce the possibility of fire or explosion. EMS will need to be given as much information regarding the injury before they arrive. Also, first aid trained employees may render assistance, and require equipment to do so, until EMS arrives. Due to the remote nature of the site, Life Flight Dispatch will be initiated if warranted.

What are the Unique Reporting Requirements?

Accident reports must be submitted to COGCC in a timely manner. Report to insurance agencies.

f. <u>Natural Disasters</u>

Any and all natural disasters including but not limited to, flooding, tornadoes, lightning strikes, severe storm, etc. Natural disasters can fall into all three categories of response with appropriate forewarning.

What Are the Unique Response Procedures?

Natural disasters can pose significant hazards due to potential release of hydrocarbons and other toxic substances. The emergency coordinator will share information on impending natural disasters that may impact a site. Employees and contractors will notify the emergency coordinator in the event they become aware of an impending natural disaster. Employees and contractors will take appropriate actions to secure each site to help minimize problems.

Preventative actions can include shutting in wells, removal of portable equipment from the site, confirmation that confirm integrity of previously installed protective measures and other similar efforts.

What Are the Unique Reporting Requirements?

Reporting requirements are based on the outcome.

TRAINING REQUIREMENTS

This plan requires training in several areas. At a minimum, employees and contractors will have:

1) Initial training on the plan's contents and basic emergency-response procedures for all BNL (Enterprise) Inc. employees and contractors that work at their locations.

2) Annual retraining to remind personnel of key areas and to update employees on new and emerging considerations that impact emergency activities.

3) Topical training that covers the appropriate emergency type including, but not limited to, the following:

    a) HAZWOPER Level I/II First-Response Operations HAZWOPER training for leasehold-operators/pumper-gaugers

    b) HAZWOPER Level III Hazardous Materials Technician (24-hour) for anyone that cleans up hazardous materials (except for incidental releases)

    c) HAZWOPER Level III Hazardous Materials Technician and Level V IC training for anyone that serves as an Incident Commander.

    d) Training on the contents of this plan and site plans (this training may be conducted as part of other training or as separate sessions)

    e) SPCC training for leasehold-operators/pumper-gaugers as described in sections 4.1 and 4.3 of the SPCC plan (this training may be conducted as part of other training or as separate sessions)

    f) Level I Well-Control Awareness for leasehold-operators/pumper-gaugers

    g) Incipient fire-fighting and emergency fire-extinguisher use for all leasehold-operators/pumper-gaugers and anyone else that may use a fire-extinguisher at a site

    h) Confined space rescue training for employees tasked with this responsibility (initially and as needed to retain skills appropriate for the rescue situations encountered)

    i) First Aid, CPR and Automated External Defibrillator (AED) training initially and once every two years thereafter to maintain certification at required levels.

    j) Other appropriate training

BNL (Enterprise) Inc. documents and retains all of the following records:

- Employee training records
- Contractor-employee training records
- Records of any hazardous materials releases
- Records required under the SPCC plan
- Other related records in conformance with applicable laws and regulations

TACTICAL RESPONSE CARD

ENTERPRISE STATE 16-1 (2962) WELL PAD

SECTION 16, TOWNSHIP 29 SOUTH, RANGE 62 WEST OF THE 6TH P.M.

LAT.: N37.51829°
LONG.: W104.33747°

All Emergencies will be reported through 911

NOTIFICATIONS

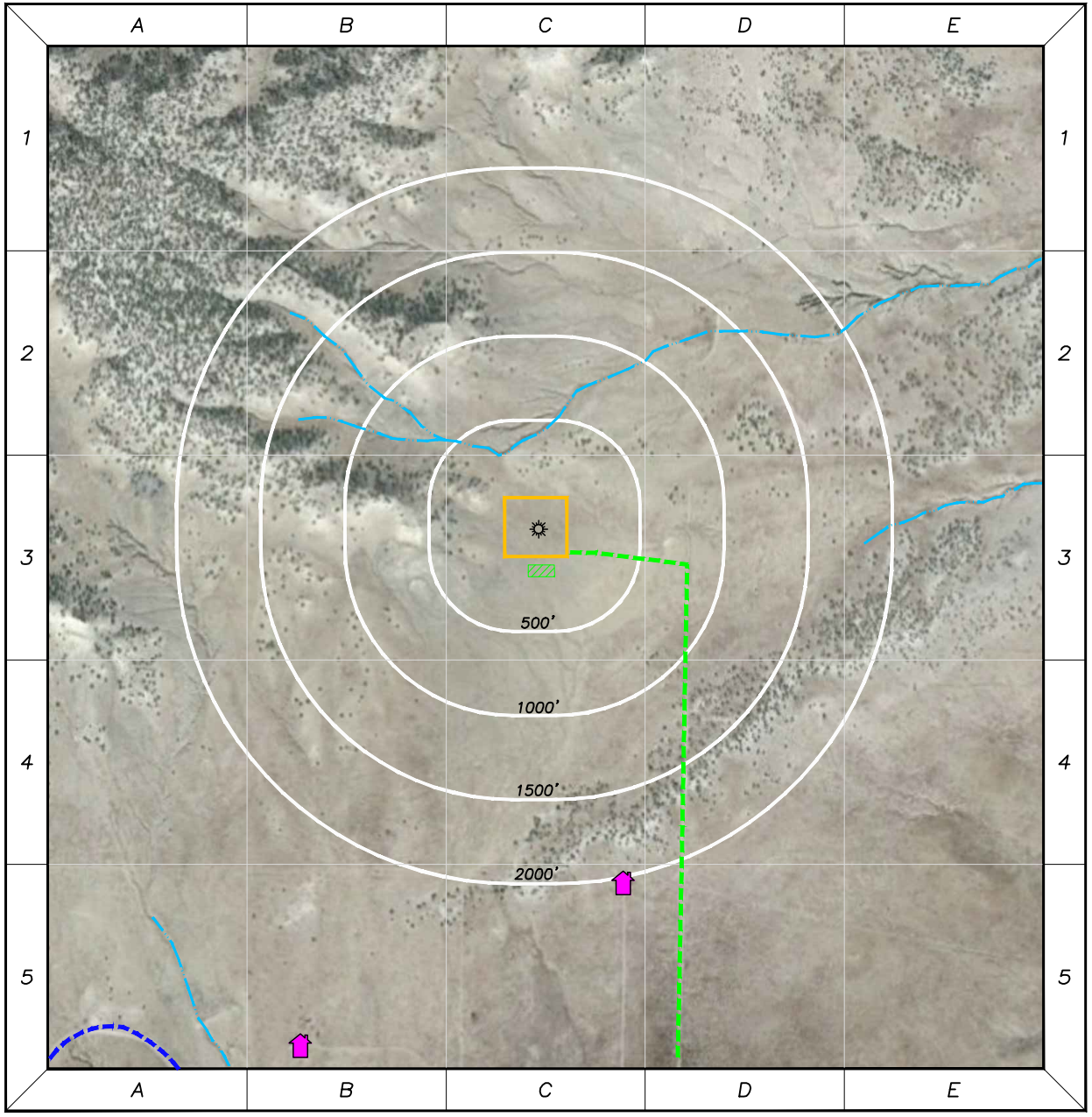
1. *Blue Star Helium Response Coordinator*
   303-632-0160
2. *Aguilar Fire Department*
   719-941-4344
3. *National Response Center*
   800-424-8802
4. *COGCC Field Supervisors*
   719-343-0130, 970-573-1277
5. *EPA Region VIII*
   303-212-6312
6. *Las Animas County OEM*
   719-845-2566

RESPONSE OBJECTIVES

Minimize the impact to the environment and local community. Contain and recover released product to the extent possible.

CRITICAL RECEPTORS

1. *Residence*
2. *County Road*



Note: This Tactical Response Card is a reference tool and is intended to provide guidance during an actual event or exercise. Placement of resources may need to be adjusted according to environmental variables. It is the responsibility of emergency response personnel to be trained in response and to be able to make adjustments to the card as needed.

Drawing Date: 6/21/21

TACTICAL RESPONSE CARD

FIRE DEPARTMENT RESPONSE GUIDELINES

COMMAND

- Establish initial command post near the oil & gas location entrance.
- Position should provide a clear view of the entire scene
- Advise responding units and resources to stage near location entrance.
- Locate operator lease sign on location (located at the entrance /site access)
- If industry personnel are not on location, call the 24–Hour Emergency Contact number located on the sign.
- Establish unified command with operator on–site liaison
- Develop incident action plan with the operator to mitigate incident
- Strategy – Always defensive unless a life safety need is identified!

INCIDENT STABILIZATION

- Implement Hazardous Materials response protocols
- All personnel operating in hazard zones should be in appropriate PPE, to include a personal mobile air monitoring device
- Establish Hot, Warm, Cold Zones, and ERG zones
- Exposure Concerns ––– Equipment, nearby structures, neighborhoods, roadways, etc.
- Monitor weather conditions, especially wind direction
- Air monitoring for vulnerable areas and locations around incident.
- Conduct evacuations of citizens, bystanders, and resources at risk
- Identify and address any water supply and/or foam requirements necessary to mitigate the incident
-

SPECIAL CONSIDERATIONS

- Consider and address any potential impacts to critical receptors identified near the location
- Consider requiring a fire investigation for any fire and/or explosion

INDUSTRY RESPONSE OBJECTIVES

Ensure safety of the public, first responders, employees, and contractors. Minimize impact to the environment and local community. The following response objectives checklist shall be followed:

SAFETY – PROTECT LIFE

- Evaluate and account for all personnel
- Isolate all potential ignition sources
- Establish site control (safe perimeter and evacuation routes)
- Contact emergency services as needed (911, Fire, LEPC)
- Identify hazard(s) of emitted material (obtain SDS)
- Monitor air around impacted area
- Continually assess site hazards/risks

RESPONSE – INCIDENT STABILIZATION

- Notify internal personnel and agencies
- Establish command post and field communications
- Identify and establish staging areas to support response operations
- Activate response tactics to control fluids
- Activate response company for equipment and manpower as needed
- Implement waste handling, disposal and decontamination procedures as needed
- Assign on–site liaison to the incident commander
- Establish Air Traffic restriction if required

ENVIRONMENTAL – PROTECT THE ENVIRONMENT

- Identify, prioritize, and protect sensitive areas
- Implement recovery efforts of fluids
- Verify if water has been impacted
- Notify appropriate agencies

FACILITY INFORMATION

Well Pad Liquid Storage:

- Water (BBL) – 300 BBL
- *1 Barrel (BBL) = 42 Gallons

Specific Facility Hazardous Conditions:

- Stage of Facility (Operational)
- There are no H2S hazards on site

Water Supply is NOT Available on Location

Nearest Foam Resources:

1. Aguilar Fire Department

Drawing Date: 6/21/21