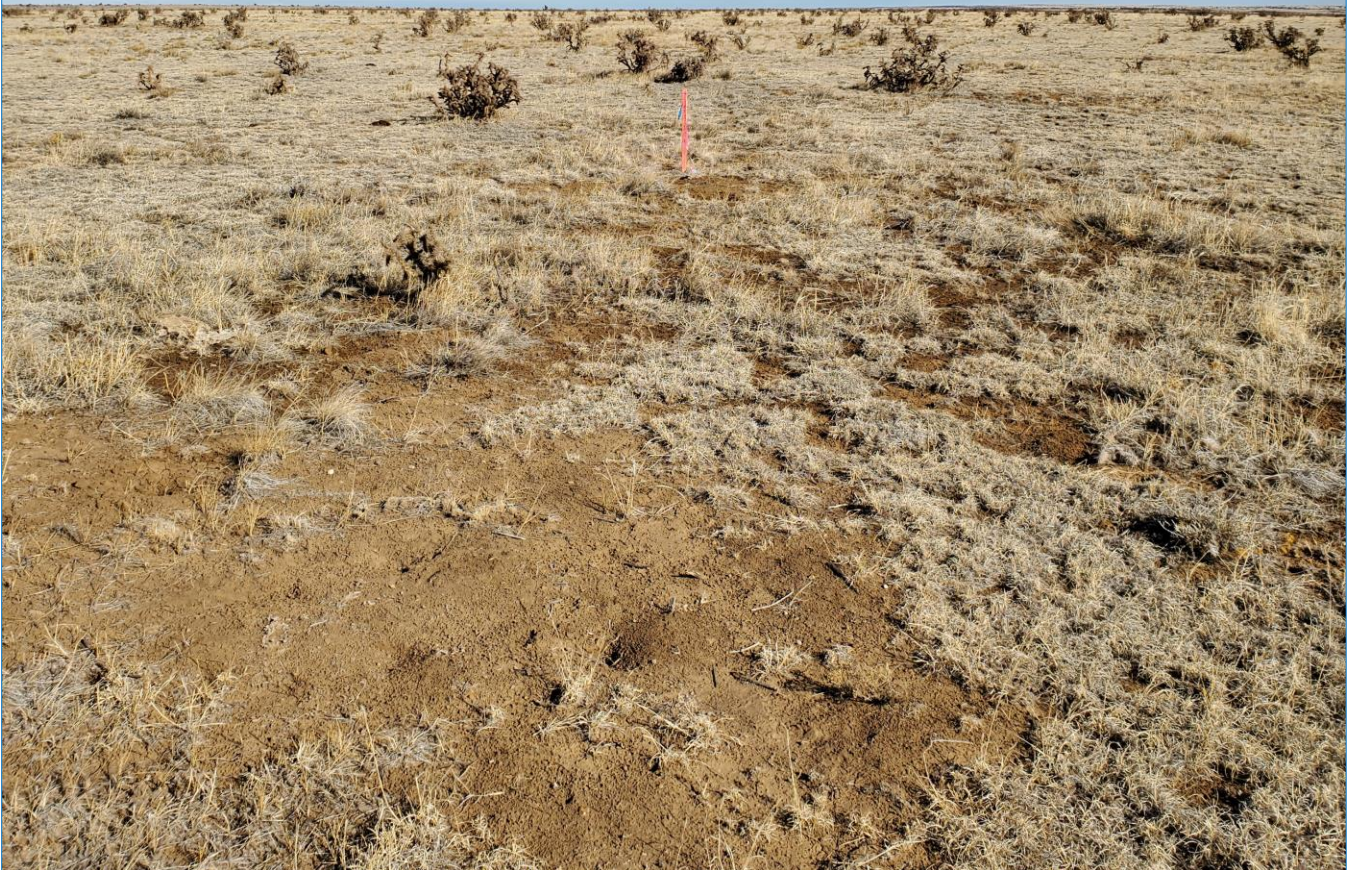


Emergency Response Plan

**Vecta Oil & Gas, Ltd.
Sammons Ranch**

Las Animas County, Colorado



PREPARED BY:

Vecta Oil & Gas, Ltd.
575 Union Blvd., Suite 208
Lakewood, CO 80228

April 2021

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1.0 INTRODUCTION

This Emergency Response Plan (Plan) has been prepared by Vecta Oil & Gas, Ltd. (Vecta) for its Sammons Ranch helium gas well development in Las Animas County, Colorado. The Plan addresses the requirement from the Colorado Oil & Gas Conservation Commission (COGCC) to prepare this Plan and coordinate its approval with the local emergency response agency. Sammons Ranch consists of the following:

- Up to four conventional vertical helium gas wells with approximately 160-acre spacing
- Two-track dirt access roads
- Buried underground flowlines for helium gas collection
- A skid-mounted helium unit
- Truck transport of helium gas cylinders off site

Helium is an inert, non-flammable, non-combustible naturally occurring gas. The wells will not produce hydrocarbons or water and do not require liquids storage tanks.

In accordance with COGCC guidance (February 16, 2021), this Plan discusses the following 16 elements:

1. The local responder coordinating agency and relevant local responder contact information.
2. The date the plan was finalized and approved by the local responding agency.
3. Directions to the location from the nearest public road intersection.
4. Ingress and egress information.
5. Legal description by $\frac{1}{4}$ section, township, and range and latitude and longitude.
6. Emergency contact number where the operator can be contacted and contact numbers for operator staff that may respond or assist in response.
7. Listing of mutual aid agencies as supplied by the local emergency response agency.
8. Staffing of local and mutual aid agencies (i.e., full time, part volunteer, all volunteer).
9. A description of the site setting, including the surrounding area.
10. A detailed layout of the location.
11. A detailed description of the equipment, typical quantities of hydrocarbon liquids and other hazardous, reactive and flammable materials stored.
12. Any sensitive areas that may be impacted by a spill or release and the plans for protecting those areas.
13. A description of how potential impacts to the environment and nearby population will be mitigated and prevented in the event of an incident.
14. A description of the response equipment, instruments and materials that are staged at the location and how they can be accessed.
15. How health and safety action levels, decontamination, and staging areas will be determined depending on the type of incident.
16. The schedule or interval of exercises and training that will be coordinated with the local government responders.

2.0 EMERGENCY RESPONSE PLAN ELEMENTS

Each of the required Plan elements is described below.

1. LOCAL RESPONSE AGENCY

Table 1. Local Response Agency Information

Agency	Contact
Kim Area Volunteer Fire Department West McKee, Fire Chief Kimvfire1@gmail.com	911 (Emergency)
	(719) 469-8415 (Non-emergency)
	(719) 928-1168 (Fire Chief)

2. DATE THE PLAN WAS FINALIZED

The date below represents the date the Plan was finalized and approved by the local response agency. Appendix B shows documentation demonstrating Vecta's coordination with the local response agency.

4/14/21

(Date)

3. DIRECTIONS TO THE LOCATION

- From the intersection of U.S. 160 and CO 109, north of Kim:
- North on CO 109 for 5.2 miles.
- Near CR 50, R at the Vecta signage on the east side of CO 109 for access to Sammons Ranch.

4. INGRESS AND EGRESS INFORMATION

- From Vecta signage on the east side of CO 109:
- Enter Sammons Ranch through locked gate.
- Drive dirt access road for ¼ mile to T intersection.
- Turn L for ¼ mile to well pads in S/2 Section 10.
- Turn R for ¼ mile to well pads in W/2 Section 15.
- All ingress and egress is via dirt ranch road and two-track accessible by emergency vehicles.

5. LEGAL DESCRIPTION

- Section, Township, and Range
S/2 Section 10 and W/2 Section 15, T31S, R53W
- Latitude/Longitude
37.35139 N / -103.35494 W

6. OPERATOR EMERGENCY CONTACT INFORMATION

Table 2. Operator Contact Information

Staff	Contact
Vice President - Land	Bill Untiedt (720) 351-3508 billuntiedt@vecta-denver.com
Vice President - Operations	Mathew Goolsby (303) 618-7736 matgoolsby@vecta-denver.com
Local Operator	c/o Mathew Goolsby (303) 618-7736 matgoolsby@vecta-denver.com
Property Owner	Monte Sammons 23200 County Road 199.1 Kim, CO 81049

7. MUTUAL AID AGENCY

Table 3. Mutual Aid Agency Information

Agency	Contact
Las Animas County Sheriff's Office Derek Navarette, Sheriff and Fire Marshall navarette@lasosheriff.org	911 (Emergency)
	(719) 846-2211 (Non-emergency)
	(719) 846-2211 (Sheriff)

8. STAFFING OF LOCAL AND MUTUAL AID AGENCIES

The Kim Area Volunteer Fire Department is a nonprofit organization staffed by volunteer emergency responders. It provides ambulance and fire department services in the Kim, Colorado area.

The Las Animas County Sheriff's Office is the chief law enforcement and public safety office for Las Animas County. It is overseen by the sheriff, undersheriff, and lieutenant, with an additional nine sergeants and deputies.

9. SITE SETTING

Sammons Ranch is located on former rangeland. The site setting is arid and sparsely vegetated. Vegetation is primarily grama, buffalo grass, and prickly pear cactus. There are no improvements or residences near the location. The closest residence is approximately 0.75 miles southwest, on the west side of CO 109. Figure 2-1 in Appendix A shows an aerial view of the location and surrounding area.

10. LOCATION LAYOUT

Sammons Ranch will have up to four individual well pads with approximately 160-acre spacing between wells. Well pads during well drilling and completion will be approximately 1 acre each. Well pads during production will be approximately 0.2 acre each. Each well pad will contain a single helium gas wellhead.

Helium gas will be collected using 4-inch-diameter high density polyethylene flowlines buried along the access road alignment. An area will be located near CO 109 for a skid-mounted helium unit and for loading helium cylinders. Helium cylinder will be transported off site by truck.

Diesel power will be used only during the approximately 7 to 10 days needed for well drilling.

11. EQUIPMENT AND STORED MATERIAL

Well drilling and productivity testing at each well will require the following:

- Equipment for well pad construction
- Drill rig
- Winch truck
- Water truck and trailer
- Pipe truck and trailer
- Diesel engine and fuel tank

Production will require:

- Skid-mounted helium unit at a location near CO 109
- Helium cylinders for transport off site

Stored material will consist of small volumes of incidental lubricants for well operation and material to support the helium unit. The helium unit will purify and compress the helium into cylinders for truck transport off site.

The wells do not have characteristics of oil or natural gas wells. There will be no liquids storage tanks, separators, or combustion devices on the location.

12. SENSITIVE AREAS

There are no sensitive areas near the Sammons Ranch development. The nearest residence is approximately 0.75 mile to the southwest, on the west side CO 109. The nearest surface water is Two Butte Creek, approximately 3,500 feet east of the nearest well. The nearest public road is CO 109, approximately 1,300 feet from the nearest well.

13. POTENTIAL IMPACTS, PREVENTION, AND MITIGATION

The wells do not pose a risk of fire, explosion, or hazardous air emissions. The wells will not produce natural gas, hydrocarbons, or water.

Potential impacts will be limited to incidental spills of material supporting well or helium unit operation, such as small amounts of lubricants. Material will be properly containerized and stored to prevent exposure to elements and spills. Site equipment will be maintained in good working condition and operated according to training and manufacturer specifications.

14. RESPONSE EQUIPMENT

Spill response materials will be maintained on site for cleanup of small leaks or spills, such as lubricants or incidental fuel leaks. The material will be available in a centralized location and inspected and replenished, as needed.

In the event of a larger incident, Vecta will manage support from a third-party provider to respond to a spill and any potential soil contamination.

15. HEALTH AND SAFETY ACTION LEVELS

Vecta will maintain regular communication with the site operator during well pad construction, well drilling and completions, and production. Daily communication during well development will be used to address any field issues requiring resolution to maintain site safety. Regular communication during production will identify site maintenance and work practices that may need to be addressed to maintain safe operations. Action levels to provide for site safety and prevent hazardous operations will consist of the following:

1. Daily Log

- Notes site activity and items requiring response or maintenance/repair.

2. Maintenance Log

- Provides a record that maintenance/repair items were addressed.
- Documents preventative maintenance.
- Provides a schedule for repeat maintenance.

3. Incident Report

- Documents incident and response
- Ensures that conditions leading to the incident were addressed.

16. TRAINING COORDINATED WITH LOCAL RESPONDERS

Site personnel will be trained on the types of incidents they may encounter, including:

- Motor vehicle accidents
- Equipment operation accidents
- Medical incidents
- Weather-related incidents
- Fire

The types of incidents will be coordinated with the local response agency for input during their review of the Emergency Response Plan.

Personnel will be instructed that work areas are to be kept free of excessive vegetation or debris that could pose a risk of fire. Equipment will be maintained in good working condition to avoid preventable sparking and overheating. Off-road internal combustion engine-powered equipment will have a fire extinguisher and shovel to provide the capability to extinguish an inadvertent fire, to the maximum extent possible.

Medical incidents would typically consist of minor injuries, such as cuts, scrapes, minor burns, trips, and sprains. Weather-related incidents could include heat or cold-related injury, sunburn, bites, or stings. The first line of response for a medical incident will be on-site treatment and notification to the Vecta supervisor. Serious incidents could require response from off site by dialing 911 or transport by private vehicle for off-site treatment.

NEAREST MEDICAL FACILITY

Arkansas Valley Regional Medical Center

1100 Carson Avenue
La Junta, CO 81050
(719) 384-5412
24-hour Emergency Room

Directions:

N on CO 109 to La Junta
Continue on CO 109
L on E. 10th St. in La Junta for 1 mile
Medical facility on the L

Site personnel will be instructed that this nearest medical facility is approximately 50 miles away. If the incident requires critical care, the site is served by the following air ambulance:

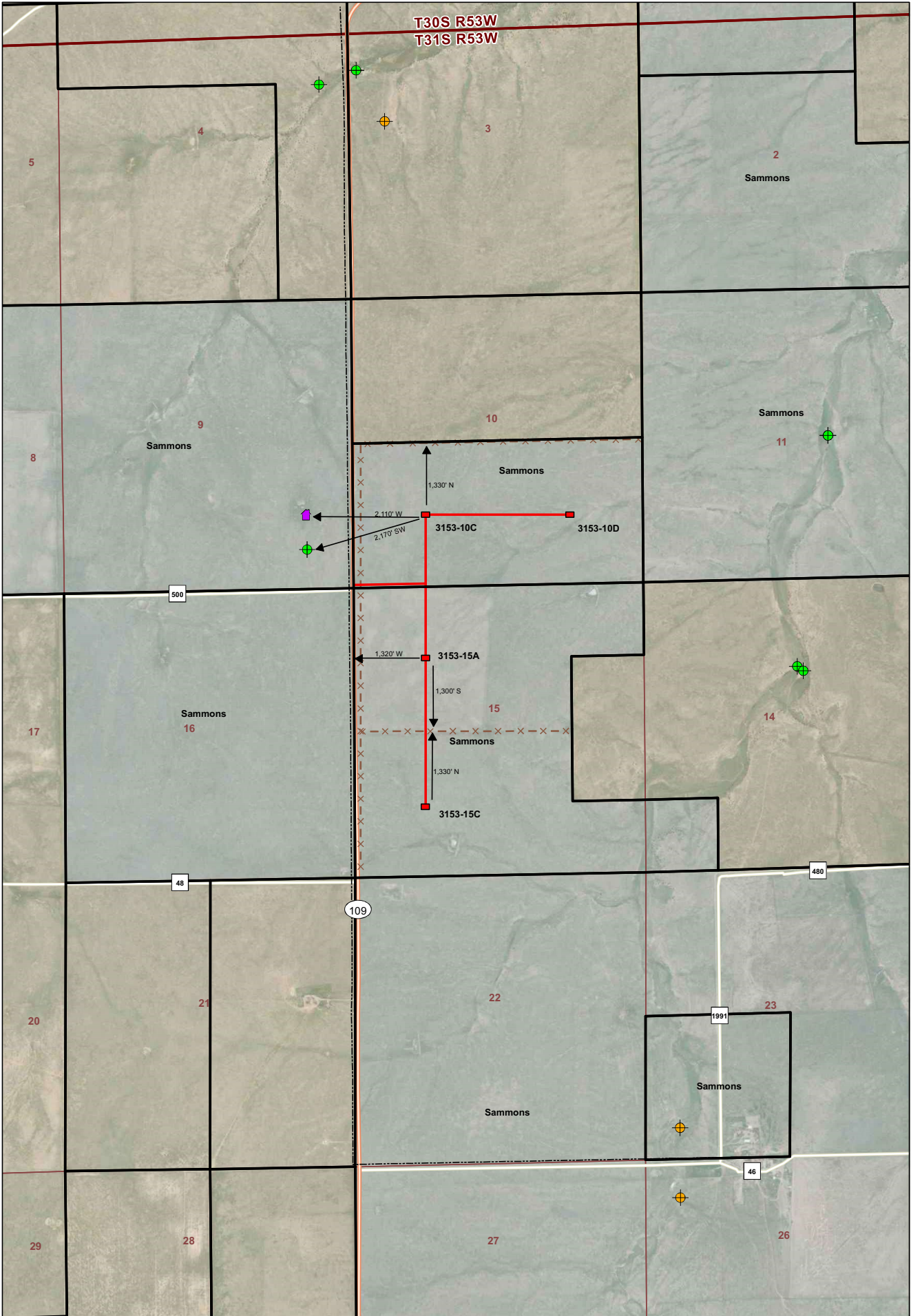
FLIGHT FOR LIFE COLORADO

Lifeguard Four Station

St. Mary-Corwin Medical Center
Pueblo, CO

The Lifeguard Four Station operates from a base at the St. Mary-Corwin Medical Center in Pueblo, with a range of 150 miles. This range includes the Sammons Ranch operation. Transport requests are made by a physician, ambulance service, fire department, or law enforcement agency.

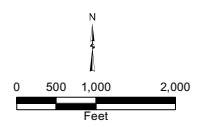
Appendix A
Figure 2-1



Aota Technical, LLC
Vecta Oil & Gas, Ltd.
Sammons Ranch
Location Drawing - Aerial

Date: 3/18/21
 Figure No.: Figure 2-1

- Legend**
- Water Well Permit Issued
 - Water Well Constructed
 - Above Ground Utility Line
 - Parcel Boundary
 - Abandoned Farmhouse
 - Conventional Vertical Helium Gas Well Location (100'x150')
 - Conventional Vertical Helium Gas Well Access and Flowline
 - Fence



Data Source: COGCC GIS Online

Appendix B
Demonstration of
Local Response Agency Coordination

From: West McKee
To: Mathew Goolsby
Sent: April 14, 2021 at 12:05 PM
Subject: Re: Emergency Response Plan, Vecta wells planned near Kim, CO.

I acknowledge the receipt of your email, i have no questions at this time

On Tue, Apr 13, 2021 at 6:32 PM MATHEW GOOLSBY <mdgoolsby@comcast.net> wrote:

Chief McKee,

Vecta Oil & Gas, Ltd. is proposing to develop up to four helium gas wells on private ranch land, approximately 5 miles north of Kim, on the east side of CO 109. The location is shown on Figure 2-1 in Appendix A in the attached Emergency Response Plan. The wells will be conventional vertical wells. Unlike an oil or gas well, the Vecta wells are anticipated to contain inert helium gas without hydrocarbons or produced water. The site will not have storage tanks. Helium gas will be piped to a centralized skid-mounted helium unit to purify and compress the helium into cylinders for truck transport to a helium plant in Cheyenne Wells, CO. The Colorado Oil & Gas Conservation Commission requires that operators prepare an Emergency Response Plan and coordinate it with the local emergency response agency. Once you have had a chance to review the information, please let me know if you have questions or would like a meeting with Vecta. If you feel that a meeting isn't necessary, your response to this email will provide a demonstration of Vecta's coordination with your agency. Please feel free to reach me at matgoolsby@vecta-denver.com or (303) 618-7736.

Thank you for your attention to this matter.

Mathew D. Goolsby
VP-Operations
Vecta Oil & Gas Ltd
575 Union Blvd, Ste 208
Lakewood, CO 80228
303.618.7736 (mob)