

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

402650999

Date Received:

05/18/2021

## CUMULATIVE IMPACTS DATA IDENTIFICATION

Per Rule 303, this form and all required components and attachments will be submitted for any Oil and Gas Development Plan.

Form Type: ☒ OGD ☐ Partial 2B - Rule 803.b.(2).A UIC Conversion

## OPERATOR INFORMATION

OGCC Operator Number: 10261

Name of Operator: BAYSWATER EXPLORATION &amp; PRODUCTION LLC

Address: 730 17TH ST STE 500

City: DENVER State: CO Zip: 80202

Contact Name and Telephone:

Name: Mark Brown

Phone: (720) 350 8858

Email: mbrown@bayswater.us

## OIL &amp; GAS DEVELOPMENT PLAN INFORMATION

Oil &amp; Gas Development Plan Name: Blehm 18-I Pad

Oil &amp; Gas Development Plan Docket #:

Oil &amp; Gas Development Plan ID #:

Docket Number

210300017

OGDP ID Number

480293

☐ This OGD is included in a Comprehensive Area Plan. CAP ID #: \_\_\_\_\_

## OIL &amp; GAS LOCATION DATA

1 Oil &amp; Gas Location Name: Blehm

Number: 18-I Pad

Status: Proposed

## OIL &amp; GAS LOCATION INFORMATION

Form 2A Doc#: 402580742

Loc ID#:

Oil &amp; Gas Location: QTRQTR: LOT 3 Sec: 18 Twp: 7N Rng: 66W Meridian: 6

Total number of wells planned: 24

## Operations Duration

Estimated total number of weeks to construct this Oil &amp; Gas Location: 2

Estimated total number of weeks to drill all planned wells for this Oil &amp; Gas Location: 25

Number of planned drilling occupations to drill all planned wells for this Oil &amp; Gas Location: 1

Estimated total number of weeks to complete all planned wells for this Oil &amp; Gas Location: 20

Number of planned completions occupations to complete all planned wells for this Oil &amp; Gas Location: 1

Will there be simultaneous drilling and completions operations occurring at this Oil &amp; Gas Location? No

Estimated total number of months the Oil &amp; Gas Location will be active, prior to abandonment and reclamation: 300

## Noise Impacts

Provide a qualitative evaluation of the incremental adverse noise impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

Adverse noise impacts are expected during pre-production activities for the 10 building units within 2000' of the site. There also are no High Priority Habitats within a mile and therefore no adverse noise impacts are expected in that regard. The heavy equipment used to construct the pad, followed by the 24-hour drilling operations and subsequent 24-hour completion frac, drill out and flowback operations will be the source of potential noise impacts. A third-party Noise Impact Assessment (NIA) has been done (attached), which includes a predictive noise model of the planned drilling and completion operations at the site. Such modeling indicates that some mitigation efforts will be needed to stay within the compliance levels of the C-weighted noise level limits. A mitigated" predictive model was then ran which predicts that both C & A weighed noise levels will be within the COGCC limits at the nine building unit receptors. The mitigation measures include the installation of 32' high STC 32 engineered sound walls around the perimeter of the working pad surface, an upgrade to the exhaust silencers associated with the generators on the drilling rig and the installation of 24' STC 43 sound walls near the drilling rig shakers. Bayswater will also use one of the "quiet frac fleets" to further mitigate the impact of sound generated by the completion operations. Sound walls will remain in place through the duration of the completion operations.

Provide a qualitative evaluation of the incremental adverse noise impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

Adverse noise impacts are not expected during production activities for the 10 building units within 2000' of the site. Noise during production stage will be limited to daily pumper and water hauling vehicle traffic and the operation of compressors and enclosed combustion devices. The noise from the compressors will be mitigated by the installation 16' high sound walls around them. Some additional noise will be encountered during workover operations if a workover rig is needed at a date following initial completion operations. The use of pipelines for oil and gas takeaway will eliminate noise by eliminating truck traffic associated with takeaway.

### Light Impacts

Provide a qualitative evaluation of the incremental adverse light impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

Rig lighting and lighting associated with completion equipment may pose adverse lighting impacts during the drilling and completions phases to the 10 residential building unit owners within 2,000'. There are no High Priority Habitats within a mile of the site. Lighting impacts will be mitigated by the installation of 32' sound walls around the perimeter of the working pad surface and the additional lighting BMPs as noted in the Lighting Plan.

Provide a qualitative evaluation of the incremental adverse light impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

Production lighting impacts to the 10 residential building unit owners within 2,000' of the site will be limited to manually controlled lighting at the tank battery location as needed for safety purposes and vehicle lights. Lighting impacts will be mitigated by utilizing timer-controlled lighting and by additional visual screening along the west side of the location by virtue of an earthen berm utilizing the topsoil stockpile.

### Odor Impacts

Provide a qualitative evaluation of the incremental adverse odor impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

Potential sources of odors and emission points for drilling and completions operations toward the 10 building units within 2,000' include engines, Drilling Rig Gen Sets, Third Party Vendor Trucks, Diesel Fuel Storage, Oil Based Drilling Mud & Storage, Drill cuttings across shale shakers, Drill cuttings haul off to disposal facility, Toilets & Dumpsters, Workover or Coiled Tubing Rig, Pump & Sand Trucks, Generators, Acid Transports, and perforating guns.

Provide a qualitative evaluation of the incremental adverse odor impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

Potential sources of odors and emission points for production operations toward the 10 building units within 2,000' may include Separators, Tanks, Compressors, Knockouts, Dehydrators, ECD, Generators, Chemical Storage, Diesel Fuel Tanks, Sumps & Scrubbers, Toilets, and Dumpsters.

## **WATER RESOURCES**

☒ This Oil & Gas Location is listed as a sensitive area for water resources.

☒ This Oil & Gas Location is within 2,640 feet of a surface Water of the State.

Estimated depth to groundwater: 15

Estimated total planned on-location storage capacity of the Oil & Gas Location for:

Number of Tanks

Total Volume (bbls)

Oil	10	5000
Condensate	0	0
Produced Water	2	1000
Other volumes of stored fluids, hydrocarbons, chemicals, or E&P Waste Fluids	2	1000

List, with volumes, the "Other" fluids planned to be stored on the Oil & Gas Location, including, but not limited to: hydrocarbons, chemicals, or E&P Waste fluids.

2 Multi-use tanks will contain oil or produced water

### Potential Impacted Surface Water Resources

Provide the distance and direction of the contaminant migration pathway from the Oil & Gas Location to the nearest downstream riparian corridors, wetlands, and surface Waters of the State. Also provide an evaluation of the baseline condition of the nearest downstream riparian corridors, wetlands, and surface Waters of the State.

Enter 2,640 for distances greater than 1/2-mile. Distances are measured along the migration pathway, not a straight line from the edge of the Oil & Gas Location.

	Distance	Direction	Evaluation of Baseline Condition
Riparian Corridor	2640	N	none; not in range of field observation
Wetland	15	S	Dry at time of observation - seasonally wet beginning in May
Surface Waters of the State	46	S	ditch is dry at time of observation; ditch water has intermittent flows.

### Potential Impacts to Public Water Resources

Provide the distance, direction, and evaluation of potential impacts to the nearest Public Water System Intake. Enter 5,280 for distances greater than 1-mile.

	Distance	Direction	Evaluation of Baseline Condition
Public Water System Intake	5280	NE	none; not in range of field observation

### Estimated Water Usage

Provide the estimated total volumes of the following that are anticipated to be used during the drilling and completions stage of the Oil & Gas Location activity.

Water Source	Volume (bbls)		Volume (bbls)		Volume (bbls)			
Surface Water	0	Recycled Water (Produced Water)	0	Unspecified Source	10372000	Percentage Recycled Water	0	%
Ground Water	0	Recycled Water (non-Produced Water)	0	Total Water Usage	10372000			

If an unspecified water source is planned to be used, provide a description of the source.

City of Eaton Water Depot - Drilling  
Larimer-Weld Ditch Company - Completion  
Both may use a combination of surface and groundwater.

Evaluate the measures being taken to reduce freshwater use, including reusing and recycling produced water.

none.

### ECOSYSTEM & WILDLIFE RESOURCES

List High Priority Habitats (HPH) that occur within one mile of the Oil & Gas Location and list the distance from working pad surface. If the location is partially or entirely within a HPH list the distance as '0' and provide the estimated acreage disturbance of that HPH by the location construction.

Data not required

List total size of disturbed acreage and disturbed High Priority Habitat (HPH) area (in acres) during the Oil & Gas Location construction and after interim reclamation.

	Total Acreage (acres)	Total HPH Acreage (acres)	Provide any further information regarding the location's HPH disturbance.
Construction	0	0	No HPH will be disturbed.
Post-interim Reclamation	0	0	

Provide the acreage of the existing land use types that occur within one mile of the Oil & Gas Location. Note: a circle with a one mile radius is approximately 2010 acres.

		Existing Acreage		Existing Acreage		Existing Acreage		Existing Acreage
Crop Land:	Irrigated	780	Non-Irrigated	780	Conservation Reserve Program(CRP)	0		
Non-Crop Land:	Rangeland	0	Forestry	0	Recreation	0	Other	0
Subdivided:	Industrial	0	Commercial	0	Residential	450		

If any land use is industrial, provide a description of the use or operation of the industrial facilities.

If any land use is "Other", provide a description of the land use.

If any portion of the land use for the proposed oil and gas location includes Rangeland, Forestry, or Recreation, provide a list of the plant community or communities and estimated acreage disturbed for each:

	Estimated Disturbed Acreage		Estimated Disturbed Acreage		Estimated Disturbed Acreage		Estimated Disturbed Acreage
Disturbed Grassland		Shrub Land		Mountain Riparian		Wetland Aquatic	
Native Grassland		Plains Riparian		Forest Land		Alpine	

Provide a qualitative evaluation of incremental adverse impacts to ecosystems, including any plant communities, as a result of Oil and Gas Operations associated with the proposed Oil & Gas Location.

N/A - Location is in dry land crop.

### Soil Resources

List all soil map units that occur within the Oil & Gas Location and list the estimated total area (in acres) disturbance of each soil map unit.

NRCS Map Unit Name:	Estimated Disturbed Acreage
47 - Olney fine sandy loam, 1 to 3 percent slopes	1.1
48 - Olney fine sandy loam, 3 to 5 percent slopes	10.6

### PUBLIC WELFARE

☒ This Oil & Gas Location lies within a Disproportionately Impacted Community as defined in the 100-series rules.

Building Units within 1-mile	0'-2,000'	2,001'-5,280'
Total number of ResidentialBuilding Units:	10	79
Total Number of non-school AND non child care center High Occupancy Building Units:	0	0
Total number of School Facilities:	0	0
Total number of Child Care Centers:	0	0

### Recreation and Scenic Value

List all State Parks, State Trust Lands, or State Wildlife Area within 1-mile of the Oil & Gas Location.

None.

List all Designated Outdoor Activity Areas within 1-mile of the Oil & Gas Location.

None.

List all mapped trails that support any of the following recreational activities within 1-mile of the Oil & Gas Location: Hiking, Biking, Horseback Riding, Motorcycle Riding, ATV Riding, OHV, Nordic Skiing, Snowmobiling, or Snowshoeing.

None.

### AIR RESOURCES

#### Pre-Production Emissions

Complete the following chart based on the estimated total equipment emissions (in tons) for the Oil & Gas Location during the pre-

production (construction, drilling, completions) stage for Criteria Pollutants by equipment type.

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Process Heaters or Boilers	2.25	1.85	0.15	0.5	0	2232	0
Storage Tanks	0	0	5	0	0	8	0
Venting or Blowdowns	0.6	2.75	0.05	0.005	0	5	0
Combustion Control Devices	0.6	2.75	0.05	0.005	0	5	0
Non-Road Internal Combustion Engines	95.5	230	33.18	1	0	8500	0.1
Drill Mud	0	0	9	6	0.8	0	0
Flowback or Completions	0	0	5	1	0	650	0
Loadout	0	0	0	0	0	0	0

#### Production Emissions

Complete the following chart based on the estimated full facility equipment emissions (in tons) for the Oil & Gas Location once the Oil & Gas Location has entered the production stage, for Criteria Pollutants. The table should be filled out based on ONE year of operation.

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Stationary Engines or Turbines	10	15	8	0.5	0	150	0
Process Heaters or Boilers	4	3	0.3	0	0	0	0
Storage Tanks	0	0	10	0	0	8	0
Dehydration Units	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0
Separators	0	0	12	7	2	25	0
Fugitives			1.7	0.01	0	0	
Venting or Blowdowns	0	0	12	0	0	15	0
Combustion Control Devices	1.2	5.5	0.1	0.01	0	10	0
Loadout	0	0	4	0	0	0	0
Non-Road Internal Combustion Engines	0	0	0	0	0	0	0
Well Bradenhead	0	0	0	0	0	0	0
Well Maintenance	0	0	1	0	0	0	0

#### Diesel Vehicle Road Miles

Complete the following chart for diesel vehicle road miles during each stage of oil and gas location operations.

During Construction: 5000                      During Completions: 500000  
 During Drilling: 300000                      During Interim Reclamation: 5000  
 During Production: 250000

#### PUBLIC HEALTH RESOURCES

##### Pre-Production Emissions

Complete the following chart based on the estimated total equipment emissions (in lbs) for the Oil & Gas Location during the pre-production (construction, drilling, completions) stage for Hazardous Air Pollutants (HAP).

	BEN	TOL	ETH	XYL	NHE	TMP	H2S	FDE	MET	HAP
Process Heaters or Boilers	0	0	0	0	0	0	0	0	0	0
Storage Tanks	0.1	0.01	0	0	0	0	0	0	0	0.11
Venting or Blowdowns	0	0	0	0	0	0	0	0	0	0
Combustion Control Devices	0	0	0	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	0.5	0.2	0.05	1	1	1	0	0.2	0	3.95
Drill Mud	0	0	0	0	0	0	0	0	0	0
Flowback or Completions	0.1	0.01	0	0	0	0	0	0	0	0.11
Loadout	0	0	0	0	0	0	0	0	0	0

##### Production Emissions

Complete the following chart based on the estimated total equipment emissions (in lbs) for the Oil & Gas Location once the Oil & Gas Location has entered the production stage, for Hazardous Air Pollutants (HAP). The table should be filled out based on ONE year of operation.

	BEN	TOL	ETH	XYL	NHE	TMP	H2S	FDE	MET	HAP
Stationary Engines or Turbines	60	400	0	20	0	0	0	3000	200	3680
Process Heaters or Boilers	0	0	0	0	0	0	0	0	0	0
Storage Tanks	500	40	0	0	0	0	0	0	0	540
Dehydration Units	0	0	0	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0	0	0	0
Separators	0	0	0	0	0	0	0	0	0	0
Fugitives	0	0	0	0	0	0	0	0	0	0
Venting or Blowdowns	140	140	20	40	900	0	0	0	0	1240
Combustion Control Devices	0	0	0	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	0	0	0	0	0	0	0	0	0	0
Loadout	0	0	0	0	60	0	0	0	0	60
Well Bradenhead	0	0	0	0	0	0	0	0	0	0
Well Maintenance	0	0	0	0	0	0	0	0	0	0

Provide a qualitative evaluation of any potential acute or chronic, short- or long-term incremental impacts to public health as a result of the estimated total pre-production hazardous air pollutant emissions.

On February 21, 2017, CDPHE released the "Assessment of Potential Public Health Effects from Oil and Gas operations in Colorado". Following that report, the CDPHE released another study (October 17, 2019) titled, Human Health Risk Assessment for Oil & Gas Operations in Colorado. The earlier study reviewed more than 10,000 air samples in regions of Colorado where people are living near oil and natural gas development. It concluded that all measured air concentrations were below short- and long-term safe levels. In addition, based on the CTEH report "Compilation of Benzene Measurements Near Wellpads in Colorado: A Comparison to Health Guideline Exposure Values" CTEH, LLC (July 28, 2020) it compiled over 6,500 air samples of benzene from 175-500 feet from the various operational phases. Their findings found that 99.9% of measured values were below the acute value for benzene of 9 ppb. Based on these reports and findings, it is not anticipated that the proposed operations will present any potential acute or chronic, short- or long-term incremental impacts to public health.

Provide a qualitative evaluation of any potential acute or chronic, short- or long-term incremental impacts to public health as a result of the estimated annual production hazardous air pollutant emissions.

On February 21, 2017, CDPHE released the "Assessment of Potential Public Health Effects from Oil and Gas operations in Colorado". Following that report, the CDPHE released another study (October 17, 2019) titled, Human Health Risk Assessment for Oil & Gas Operations in Colorado. The earlier study reviewed more than 10,000 air samples in regions of Colorado where people are living near oil and natural gas development. It concluded that all measured air concentrations were below short- and long-term safe levels. In addition, based on the CTEH report "Compilation of Benzene Measurements Near Wellpads in Colorado: A Comparison to Health Guideline Exposure Values" CTEH, LLC (July 28, 2020) it compiled over 6,500 air samples of benzene from 175-500 feet from the various operational phases. Their findings found that 99.9% of measured values were below the acute value for benzene of 9 ppb. Based on these reports and findings, it is not anticipated that the proposed operations will present any potential acute or chronic, short- or long-term incremental impacts to public health.

#### Dust Impacts

The following are the estimated number of truck trips traveling on or off the Oil & Gas Location.

Total	During Construction	During Drilling	During Completions	During Interim Reclamation	During Production
Monthly	100	1100	3600	150	90
Annual	100	6700	20000	300	1080

Estimated total pounds (lbs) of proppant to be used during completions activities. 3500000  
00

Provide the type of proppant(s) that are planned to be used during completions activities.

30/50 or 40/70 mesh sand

Provide an evaluation of the proposed proppant management system that will be used to minimize dust during completions activities, including the estimated amount of silica dust that will leave the Oil & Gas Location.

Operator will use the closed Sand Box technology in which no sand is blown off or transferred on location. The sand boxes are moved into position utilizing a forklift and the sand is introduced to the blender via a conveyor belt. These steps are taken to minimize silica dust and no dust is expected to leave location. The installation of 32' high sound walls also helps in containment of any silica dust leaving location.

**EXISTING OIL & GAS**

Total number of oil &amp; gas locations within 1-mile of the Oil &amp; Gas Location:

	Total Number of Locations		Total Number of Wells
Active, built	7	Active, built	21
Permitted by COGCC, unbuilt	0	Permitted by COGCC, unbuilt	2
Permitted by Relevant Local Government & not COGCC, unbuilt	0	Proposed	0
Proposed	0	Plugged and Abandoned	1

Total acreage disturbance during construction of the active and proposed oil & gas locations within 1-mile of the proposed Oil & Gas Location: 10

Source for acreage total:

- ☐ Field Observation/Measurement
- ☒ COGCC Location Files
- ☒ Aerial PhotosOther
- ☐ Other

If "Other" is selected, please describe the source use to determine the acreage total for construction disturbance of the active and proposed oil &amp; gas locations within 1-mile of the proposed Oil &amp; Gas Location.

Total permitted capacity of on-location storage (in number of pits and tanks) of the active and proposed oil & gas locations within 1-mile of the Oil & Gas Location :

NOTE: providing the existing number of pits and tanks on surrounding existing locations is optional.

Source for storage totals:

- ☐ Field Observation/Measurement
- ☒ COGCC Location Files
- ☒ Aerial PhotosOther
- ☐ Other

	Permitted Onsite Storage Capacity	Existing Onsite Storage Capacity
Oil	6	9
Condensate	30	0
Produced Water	9	3
Pits	0	0

If "Other" is selected, please describe the source use to determine the tank totals for the active and proposed oil &amp; gas locations within 1-mile of the proposed Oil &amp; Gas Location.

**OIL & GAS DEVELOPMENT PLAN-SCALE DATA**

List High Priority Habitats (HPH) that are estimated be disturbed by the construction of new roads, including access roads, pipelines, and utilities for this OGDG, along with the estimated disturbed acreage of each HPH.

No HPH Identified

List the total estimated of disturbed acreage and the total disturbed High Priority Habitat (HPH) area (in acres) during construction and the acreage that will remain disturbed after interim reclamation of the following for the entire OGDG:

	Construction			Post-interim Reclamation	
	Total Acreage (acres)	Total HPH Acreage (acres)		Total Acreage (acres)	Total HPH Acreage (acres)
New roads, including access roads	2.09	0	New roads, including access roads	2.09	0
Pipelines	2.4	0	Pipelines	0	0

Utilities 0.6 0Utilities 0 0

Provide any further information regarding the HPH disturbance from the construction of new roads, including access roads, pipelines, and utilities for this OGDG.

No part of this project will be in a HPH.

Number of miles of the existing lease road that are planned to be used to access these location(s): 0.23

### **BENEFICIAL IMPACT INFORMATION**

#### **Equipment and Facility Removal**

Total number of existing wells that are planned to be plugged and abandoned as part of this OGDG: 2

Total number of existing locations that are planned to be closed and undergo final reclamation as part of this OGDG: 1

Total number of acres that are planned to be reclaimed through the closing of existing locations: 2

Total number of existing pits that are planned to be closed and undergo final reclamation as part of this OGDG: 0

Estimated number of vehicle trips that are planned to be prevented from the above mentioned facility closures and equipment upgrades (on an annual basis): 580

Total number of tanks planned to be removed from existing locations through the approval of this OGDG:

Oil Tanks: 4

Condensate Tanks: 0

Produced Water Tanks: 2

Provide a qualitative evaluation of any incremental beneficial impacts to the surrounding community directly and indirectly from this OGDG.

Removal of two wells and one common tank battery will reduce air, light, noise, odor, and dust impacts and traffic associated therefrom to the surrounding community.

Provide a qualitative evaluation of any incremental beneficial impacts to the surrounding wildlife and ecosystems directly and indirectly from this OGDG.

Removal of two wells and one common tank battery will reduce air, light, noise, odor, and dust impacts and traffic associated therefrom that might disturb the surrounding wildlife and ecosystems and fragment potential wildlife habitat and migration corridors.

### **MITIGATION INFORMATION**

Item	Impacted Resource	Mitigation Description
1	Air Resources	Bayswater shall connect the proposed facility to nearby gas gathering systems and shall transport natural gas via pipelines at first production. Bayswater will not flare gas at this location.
2	Air Resources	Bayswater will source and deliver fresh water to the location for the completion operations via temporary pipelines which will significantly reduce the emissions impacts associated with truck traffic.
3	Air Resources	Bayswater will perform a baseline air quality monitoring survey prior to the commencement of drilling operations and the site will have continuous air monitoring during the drilling, completion and production operations. Bayswater will share the results of the baseline air quality survey, the design of the air monitoring program as well as the data the program collects with COGCC if requested.
4	Public Welfare	By utilizing a quiet frac fleet for completion operations and providing engineered noise abatement sound walls on all four sides of the pad, noise impacts will be reduced to residential building units within 2000'.
5	Public Welfare	By posting signs and advising various personnel of preferred haul routes which will not to include Weld County Road 23, truck traffic will be routed to minimize or avoid adverse traffic impacts to nearby residents.



6	Public Health Resources	Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, automation of wells and production facilities, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Bayswater additionally has implemented the use of traffic signs when leaving the location to remind drivers of specific routes to utilize.
7	Public Welfare	Bayswater will control dust on the proposed site and private access road with gravel or road base and through the use of speed restrictions, regular road maintenance, traffic restrictions during periods of high wind, silica dust controls when handling sand used in hydraulic fracturing operations, and the application of fresh water or other dust suppression agents as needed.
8	Public Health Resources	Trucks will be prohibited from idling on location when not in use to prevent the accumulation of odors and emissions from exhaust.
9	Public Welfare	By identifying all potential sources of odors and emission points and conduct emission or leak monitoring for all tanks, compressors, knockout, and oil/water separation vessels, including any pressure relief devices or vacuum devices attached to the vessels, and keep records of any releases from such devices, and through use of odor neutralizers added to drilling fluids, odor impacts will be reduced to the fullest extent possible.
10	Public Welfare	A meeting with the surface owner will occur after completions but before interim reclamation to determine a fencing plan. The location will be adequately secured per 603.h to restrict access by unauthorized persons in accordance with the surface owner's requests.
11	Public Welfare	"In order to minimize impacts to Public Welfare, all facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Volumetric Testing involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid. Spill response includes notifications, reporting, response actions, remediation, and corrective actions. Waste will be properly classified as E&P or non-E&P wastes. For E&P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. If remediation is required, a Form 27 will also be submitted. Spills related to non-E&P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. Bayswater tracks and cleans up all spills, including those that are not reportable."
12	Public Health Resources	"In order to minimize impacts to Public Health, all facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Volumetric Testing involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid. Spill response includes notifications, reporting, response actions, remediation, and corrective actions. Waste will be properly classified as E&P or non-E&P wastes. For E&P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. If remediation is required, a Form 27 will also be submitted. Spills related to non-E&P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. Bayswater tracks and cleans up all spills, including those that are not reportable."

13	Ecosystem and Wildlife Resources	<p>"In order to minimize impacts to Ecosystem and Wildlife Resources, all facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Volumetric Testing involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid.</p> <p>Spill response includes notifications, reporting, response actions, remediation, and corrective actions. Waste will be properly classified as E&amp;P or non-E&amp;P wastes. For E&amp;P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. If remediation is required, a Form 27 will also be submitted. Spills related to non-E&amp;P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. Bayswater tracks and cleans up all spills, including those that are not reportable."</p>
14	Water Resources	<p>"In order to minimize impacts to Water Resources, all facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Volumetric Testing involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid.</p> <p>Spill response includes notifications, reporting, response actions, remediation, and corrective actions. Waste will be properly classified as E&amp;P or non-E&amp;P wastes. For E&amp;P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. If remediation is required, a Form 27 will also be submitted. Spills related to non-E&amp;P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. Bayswater tracks and cleans up all spills, including those that are not reportable."</p>
15	Air Resources	<p>"In order to minimize impacts to Air Resources, all facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Volumetric Testing involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid.</p> <p>Spill response includes notifications, reporting, response actions, remediation, and corrective actions. Waste will be properly classified as E&amp;P or non-E&amp;P wastes. For E&amp;P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. If remediation is required, a Form 27 will also be submitted. Spills related to non-E&amp;P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. Bayswater tracks and cleans up all spills, including those that are not reportable."</p>
16	Public Welfare	Operator has fielded approximately 7-10 questions or comments through phone, e-mail, or in-person contact with the community between the notice response and Town Hall meeting. Topics have included noise, odor, lights, traffic, haul routes and visual landscaping, and Bayswater has also provided additional information to stakeholders via email and COGA informational documents.
17	Air Resources	Bayswater will have electrical power at this proposed site that will provide power to some portion of the production facility which will reduce noise and air emission impacts.
18	Public Welfare	Bayswater will have electrical power at this proposed site that will provide power to some portion of the production facility which will reduce noise and air emission impacts.
19	Public Welfare	Trucks will be prohibited from idling on location when not in use to prevent the accumulation of odors and emissions from exhaust.
20	Public Welfare	Signs at the location will contain contact information for continued opportunity for feedback and consultation.
21	Public Welfare	Lighting will be timer controlled to eliminate full time dusk to dawn lighting on the location.

**OPERATOR COMMENTS AND SUBMITTAL**

The 30 permitted Condensate Tanks and two permitted wells listed are from the Drake Pad (Loc ID 454899). Only two of the permitted wells and a portion of the pad disturbance are within one mile. We included them in an abundance of caution.

Print Name: Justin Garrett

Title: Regulatory Analyst

Email: regulatory@ascentgeomatics.com

Date: 05/18/2021

Based on the information provided herein, this Cumulative Impacts Data Identification Form 2B complies with COGCC Rules and is hereby accepted into the Cumulative Impacts Data Evaluation Repository (CIDER database).  
Contact OGLA Staff for consultation.

COGCC Approved: 

**Director of COGCC**

Date: 10/28/2021

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2479413	CORRESPONDENCE
2479421	CORRESPONDENCE
402650999	Form 02B SUBMITTED
402818245	OTHER
402818252	OTHER
402818255	OTHER

Total Attach: 6 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Operator provided updated information indicating there are now 10 Residential Building Units within 2,000 feet of the Working Pad Surface.	10/28/2021
OGLA	The Director has determined that the components of Rule 306.a.(1) - (5) have been met, and has issued the Director's Recommendation.	09/29/2021
OGLA	Operator responded the OGLA staff's request for additional information and clarification concerning the evaluation of Noise, Light and Odor impacts, evaluation of Beneficial impacts related to emissions reduction and wildlife ecosystem restoration, evaluation of impacts to Public Health Resources, clarification on the count of on-location permitted and existing storage tanks within 1-mile of the proposed location, and clarification on the estimates for the separator emissions.	09/21/2021
OGLA	OGLA staff contacted the operator and requested additional information and clarification concerning the evaluation of Noise, Light and Odor impacts, evaluation of Beneficial impacts related to emissions reduction and wildlife ecosystem restoration, evaluation of impacts to Public Health Resources, clarification on the count of on-location storage tanks within 1-mile of the proposed location, and clarification on the estimates for the separator emissions.	09/03/2021
OGLA	The Director has determined this OGDG application is complete.	07/15/2021
OGLA	This Form is being returned to DRAFT. The operator has been notified by email and provided a list of application deficiencies.	06/16/2021

Total: 6 comment(s)