

Cascade Creek 0697-15-08 Well Site
Dust Mitigation Plan
Rule 427. Dust



Laramie Energy, LLC
760 Horizon Drive, Suite 101
Grand Junction, CO 81506

**Cascade Creek C 0697-15-08 Well Site
Dust Mitigation Plan
COGCC Rule 427. Dust**



Introduction - Rule 427. Dust and Rule 304.c.(5) Dust Mitigation Plan

The following plan addresses the requirements for Rule 427 Dust under 400 Series of the Colorado Oil and Gas Conservation Commission's (COGCC) Rules as required by Rule 304.c.(5).

Cascade Creek 0697-15-08 Well Site

Laramie Energy, LLC (Laramie) (Operator # 10433) is pursuing a Form 2A for an Oil and Gas -Location Assessment permit in Garfield County, Colorado (**Vicinity Map - Appendix A**) for the development of the CC 0697-15-08 well site. The proposed site will be a new location developed on private property, owned by Laramie. The proposed well site will have 18 wells drilled. The site's location is centralized to Laramie's Cascade Creek operations area.

Location

The site is located on Parcel #216921400026 within Garfield County, Colorado. The parcel is located 12.2 miles north of De Beque, Colorado. The site is located approximately 14 miles northeast of De Beque, Colorado and 21.8 miles northeast by access route. The site is located approximately 9.6 miles from the nearest public road, County Road 213.

Legal Description: SENE of Section 15, Township 6 South, Range 97 West, 6th P.M.

Location Coordinates: Latitude: 39.526319°; Longitude: -108.198886°

Elevation: 8514 feet

Cascade Creek 0697-15-08 Well Site Dust Mitigation Plan

The Cascade Creek (CC) 0697-15-08 Dust Mitigation Plan (DMP) details the treatment of unpaved roads and disturbed surfaces to reduce dust produced by vehicle traffic, construction activities, or wind. The application of the DMP will reduce airborne particulate matter during operations and vehicular transportation to ensure compliance with COGCC and local jurisdictional requirements.

Laramie implements fugitive dust controls throughout the Cascade Field. Employees are trained to identify conditions and operate to minimize fugitive dust emissions. The subject site will comply with standards as stated in 427 Dust section of the 400 series.

In order to minimize and mitigate fugitive dust, Laramie has incorporated several practices. Appropriate speed limits have been designated for vehicles on unpaved roadways. Restriction of land disturbance construction activity during high-wind days are also enforced. Field employees will notify operations if dust is observed. Water trucks are utilized to wet roadways, as needed, when natural moisture is insufficient to prevent airborne dust. Water trucks apply magnesium chloride or fresh water to roadways depending on location.

Rule 427.a.(1) Soil Type

A soils report from the Natural Resource Conservation Service (NRCS) indicates that the proposed site is composed of Parachute-Irigul complex (Map Unit 55) and Northwater-Adel complex (Map Unit 52). The access road will be comprised of Parachute-Irigul complex

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(Map Unit 55) and Parachute-Irigul-Rhone association (Map Unit 56) soils. The CC 0697-15-08 Soils Maps are provided in **Appendix B**.

Parachute-Irigul Complex (Map Unit 55)

The Parachute-Irigul complex (Map Unit 55), 5 to 30 percent slopes, is composed of Parachute and similar soils: 60%, Irigul and similar soils: 30%, and minor components: 10%. Parachute and Irigul are colluvium over residuum weathered from sandstone and shale.

Parachute is a well drained soil with low available water storage of about 3.9 inches. Parachute is classified as hydrologic soil group C which defines the soil as having a slow infiltration rate when thoroughly wet.

Typical profile: A - 0 to 10 inches: loam
 Bw - 10 to 25 inches: very channery loam
 Cr - 25 to 59 inches: bedrock

The NRCS states Irigul is a well drained soil with very low available water storage of about 1.5 inches. Irigul is classified as hydrologic soil group D which defines soils as having a very low infiltration rate when wet. This means the soils in group D have a higher potential for run off.

Typical Profile: A - 0 to 6 inches: channery loam
 C - 6 to 13 inches: very channery loam
 R - 13 to 59 inches: bedrock

Northwater-Adel complex (Map Unit 52)

The Northwater-Adel complex is well drained and composed of Northwater and similar soils (50%), Adel and similar soils (40%), and minor components (10%).

The Northwater is derived from accumulated weathered sedimentary rock. It has a moderate available water storage of about 7.9 inches and has a water transmission rate that is low to moderately high at 0.01 to 0.57 inches per hour. The NRCS classifies Northwater as hydrologic soil group B which is defined as having moderate infiltration rate when thoroughly wet.

Typical Profile: A - 0 to 28 inches: loam
 Bt - 28 to 48 inches: very channery loam
 R - 48 to 60 inches: bedrock

NRCS states Adel is composed of alluvium and/or colluvium derived from sedimentary rock. Adel has a high available water storage of about 10.1 inches and a moderately high water transmission rate of 0.21 to 0.71 inches per hour. Adel is classified as hydrologic soil group C which defines the soil as having a slow infiltration rate when thoroughly wet.

Typical Profile: A1 - 0 to 20 inches: clay loam
 A2 - 20 to 31 inches: loam
 C - 31 to 60 inches: loam

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Parachute-Irigul-Rhone association (Map Unit 56)

The Parachute-Irigul-Rhone association soil unit is composed of Parachute and similar soils (35%), Irigul and similar soils (30%), Rhone and similar soil (30%) and minor components (5%). Parachute, Irigul, and Rhone all originated from accumulated weathered sandstone and shale. Each has a water transmission rate that is low to moderately high at 0.01 to 0.57 inches per hour.

Parachute is a well drained soil with low available water storage of about 3.9 inches. Parachute is classified as hydrologic soil group C which defines the soil as having a slow infiltration rate when thoroughly wet.

Typical profile: A - 0 to 10 inches: loam
 Bw - 10 to 25 inches: very channery loam
 R - 25 to 60 inches: bedrock

The NRCS states Irigul is a well drained soil with very low available water storage of about 1.5 inches. Irigul is classified as hydrologic soil group D which defines soils as having a very low infiltration rate when wet. This means the soils in group D have a higher potential for run off.

Typical Profile: A1 - 0 to 6 inches: channery loam
 A2 - 6 to 13 inches: very channery loam
 R - 13 to 60 inches: bedrock

Rhone is a well drained soil with moderate available water storage of about 8.3 inches. The NRCS classifies Rhone as hydrologic soil group B which is defined as having moderate infiltration rate when thoroughly wet.

Typical Profile: A1 - 0 to 10 inches: loam
 A2 - 10 to 39 inches: channery loam
 C - 39 to 55 inches: very channery loam
 R - 55 to 60 inches: bedrock

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Table 1: NRCS Soil Map Unit: Soil Profile

| Location | Map Unit | Map Unit Name | Composition | Typical Profile | | |
|-------------|----------|------------------------------------|-------------|---|---|---|
| Well Site | 55 | Parachute-Irigul complex | Parachute | A - 0 to 10 inches: loam | Bw - 10 to 25 inches: very channery loam | Cr - 25 to 59 inches: bedrock |
| | | | Irigul | A - 0 to 6 inches: channery loam | C - 6 to 13 inches: very channery loam | R - 13 to 59 inches: bedrock |
| Well Site | 52 | Northwater-Adel complex | Northwater | A - 0 to 28 inches: loam | Bt - 28 to 48 inches: very channery loam | R - 48 to 60 inches: bedrock |
| | | | Adel | A1 - 0 to 20 inches: clay loam | A2 - 20 to 31 inches: loam | C - 31 to 60 inches: loam |
| Access Road | 56 | Parachute-Irigul-Rhone association | Parachute | A - 0 to 10 inches: loam | Bw - 10 to 25 inches: very channery loam | Cr - 25 to 59 inches: bedrock |
| | | | Irigul | A - 0 to 6 inches: channery loam | C - 6 to 13 inches: very channery loam | R - 13 to 59 inches: bedrock |
| | | | Rhone | A1 - 0 to 10 inches: loam | A2 - 10 to 39 inches: channery loam | C - 39 to 55 inches: very channery loam R - 55 to 60 inches: bedrock |

Table 2: Soils Occurring in Location

| Location | Map Unit Symbol | Soil Series | Soil Unit Description | Estimated Acreage Disturbed |
|-------------|-----------------|---|--|-----------------------------|
| Well site | 55 | Parachute-Irigul complex | Occurs on the mountain flanks of mountain slopes. Parent material is colluvium over residuum weathered from sedimentary rock | 4.34 |
| Well Site | 52 | Northwater-Adel complex | Occurs on mountain slopes and is derived from colluvium over residuum weathered from sandstone and shale. | 2.77 |
| Access Road | 56 | Parachute-Irigul-Rhone association, 25 to 50 percent slopes | Occurs on mountain slopes and the parent material is colluvium over residuum weathered from sandstone and shale. | 0.56 |

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Rule 427.a.(2) Proposed vehicle speed limit to minimize dust

Access roads within Laramie's Cascade Creek field will not exceed speeds of 25 miles per hour (m.p.h.) on unpaved roads. During dry conditions or when dust is visible, vehicles will reduce speeds based on conditions. Field employees will notify operations if dust is observed.

Rule 427.a.(3) Total area of soil disturbance (in acres)

Total surface area of initial disturbance is estimated at 7.6 acres for the proposed well site. The estimated earthwork is shown in the Layout Drawings (**Appendix B**) and includes topsoil, cut, and fill estimates for pad construction and stormwater control features.

Operations will be conducted in the following stages at the CC 0697-15-08: initial grading activities, drill rig mobilization, drilling, completions and flowback, production, interim reclamation, and final grading/reclamation of the site. Phases may occur simultaneously at the site. Inspection activities will occur during the lifespan of the site.

The CC 0697-15-08 will initially generate 7.6 acres of new short-term disturbance (**Layout Drawing – Appendix C**); however, the site will be reduced by approximately 5.8 acres at the time of interim reclamation (**Appendix C**). The long-term disturbance associated with this pad will be 1.8 acres. Interim reclamation will begin after all wells are drilled and completed as planned with production facilities installed at the pad. Interim reclamation activities will take approximately 5 days to complete. During interim reclamation, the cut and fill slopes will be reshaped and contoured leaving approximately 1.8 acres of working area.

Table 3. Disturbance Acreage for CC 0697-15-08 Well Site

| Area | Disturbance in Acres |
|---|-----------------------------|
| Area of Disturbance (including access road) | 7.6 acres |
| Working Pad Surface | 3.2 acres |
| Area to be reclaimed during interim reclamation | 5.8 acres |
| Production Pad Surface (long-term disturbance) | 1.8 acres |

Laramie will implement and complete temporary (i.e., pre-interim) reclamation or standard interim reclamation practices as required on the "open" pad to control stormwater drainage and weeds and provide for wildlife protection measures and dust abatement.

Rule 427.a.(4) Surface of Access Road

The proposed access road will be installed within the CC 0697-15-08 Area of Disturbance and previously disturbed surface of the CC 697-15-23. No additional soil disturbance for the access road is anticipated. Gravel will be placed on the CC 0697-15-08. Initial gravel application shall be a minimum of 6 inches. Laramie will provide timely year-round road maintenance and cleanup on the access roads. A regular schedule for maintenance will

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include, but not be limited to, blading, ditch and culvert cleaning, road surface replacement, and dust abatement.

Unpaved roads and staging areas shall be watered three times daily when being used by construction vehicle traffic to maintain no visible vehicle travel dust emissions.

Rule 427.a.(5) Number of anticipated truck trips during each stage of wellpad construction, drilling, completion, and production

The following **Table 4** summarizes the total expected average VPD and maximum trips per activity for the operational life of the CC 0697-15-08 well site.

Table 4: Trip Generation – Total Trips Accessing 0697-15-08 Well Site

| Stage | Time Interval (Days) | Total Maximum Trips Generated Per Activity* | Average VPD Per Activity* |
|---|----------------------|---|---------------------------|
| Initial Grading and Construction Activities | 30 | 124 | 4.1 |
| Drill Rig Mobilization | 4 | 198 | 47.3 |
| Drilling | 110 | 2440 | 22.2 |
| Completions and Flowback Staging and Demobilization | 20 | 562 | 28.1 |
| Completions; Flowback | 66 | 1630 | 25.2 |
| Production | - | - | 2 |
| Interim Reclamation | 5 | 26 | 5.2 |
| Inspections | - | - | 1 |

*Calculations based on the CC 0697-15-08 Traffic Summary, combining vehicle trips on private and public access roads.

Rue 427.a.(6) A plan for suppressing fugitive dust caused solely by wind

During construction and earthwork activities employees and contractors will report if wind speeds increase and dust is observed. Laramie will implement dust abate measures, as stated in the DMP, to reduce and prevent dust caused by wind.

To prevent dust from wind when the site is not actively being accessed, Laramie will employ watering. Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered.

Employees and contractors will be notified if weather events that may promote dust are predicted or observed.

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Rule 427.a.(7) Best Management Practices

Laramie has adopted the following BMPs to mitigate dust during construction and transportation activities:

- Vehicles will not travel at speeds over 25 m.p.h. on unpaved roads.
- During dry conditions or when dust is visible, vehicular speeds will be reduced.
- Restriction of land disturbance construction activity during high-wind day.
- Field employees will notify operations if dust is observed.
- Water trucks will be utilized to wet roadways, as needed, when natural moisture is insufficient to prevent airborne dust.
- Water trucks apply magnesium chloride or fresh water to roadways depending on location.
- Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet.
- Construction activities that occur on unpaved surfaces shall be discontinued during periods when activities are causing visible dust plumes that cannot be avoided by approved dust suppression methods.
- Contractor shall conduct a visual inspection of the vehicle wheels and the wheels of the equipment loaded upon each vehicle to assess the presence of dirt.

Laramie uses fresh water sources within the Cascade Creek or Knowles Trucking for dust suppression. Knowles Trucking, utilized depending on conditions or time of year, obtains fresh water from the Colorado River prior to accessing the Cascade Creek field.

Laramie has two main fresh water sources within the Cascade Creek field. Firewater Pond provides the water source for the Plateau/Mesa area and the Savage Pond is the source for the valley. Firewater is pumped into Pond 13 or Pond 4 and water trucks access the water from stated ponds for dust suppression application.

Rule 427.b. Operators will minimize fugitive dust caused by their operations, or dust originating from areas disturbed by their Oil and Gas Operations that becomes windborne.

Laramie will adhere to Rule 427.b. Laramie will implement fugitive dust controls throughout the Cascade Field as stated in the 0697-15-08 Dust Mitigation Plan to minimize dust caused by operations.

Rule 427.c. Applying Dust Suppressant.

Laramie will apply fresh water and/or magnesium chloride as a dust suppressant depending on conditions and location. Any chemical-based dust suppressant shall be applied per manufacturer's recommendations and in sufficient quantities to maintain compliance.

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Rule 427.c.1. Laramie will not apply the following fluids for dust suppression as state in COGCC Rule 427.c.(1):

- Produced water
- E&P Waste or hazardous waste
- Crude oil or any oil not specifically designed for road maintenance
- Solvents
- Any process Fluids

Rule 427.c.(2) *Operators will use only fresh water (potable or non-potable) to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body.*

Laramie will adhere to COGCC 427.c.(2) and will only utilize fresh water to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body.

Rule 427.c.(3) *Operators will maintain safety data sheets ("SDS") for any chemical-based dust suppressant and make the SDS available immediately upon request to the Director and to the Local Government. Operators will maintain SDS for any chemical-based dust suppressant until the site passes final site Reclamation and transfer the records upon transfer of property ownership.*

Laramie will maintain SDS for any chemical-based dust suppressant utilized in within the CC 0697-15-08 site perimeter. Records will be made available upon request. Any chemical-based dust suppressant shall be applied per manufacturer's recommendations and in sufficient quantities to maintain compliance.

Rule 427.d. *Within 2,000 feet of Building Units, or High Priority Habitat, the Commission may require additional dust control measures as a condition of approval.*

The DMP was designed to mitigate and minimize dust impacts to any wildlife and vegetation in the surrounding area. The CC 0697-15-08 is not located within 2,000 of any building units. The proposed site location is located within 2,000 of a High priority habitat.

Dust generated during project construction and project-related vehicle traffic on associated access roads has the potential to impact adjacent vegetation. Dust deposition may reduce plant numbers or plant vigor as a result of respiratory and reproductive suppression. However, due to the short-term construction phase and the implementation of dust suppression measures during construction activities, dust impacts are not expected to create any long-term impacts on nearby vegetation.

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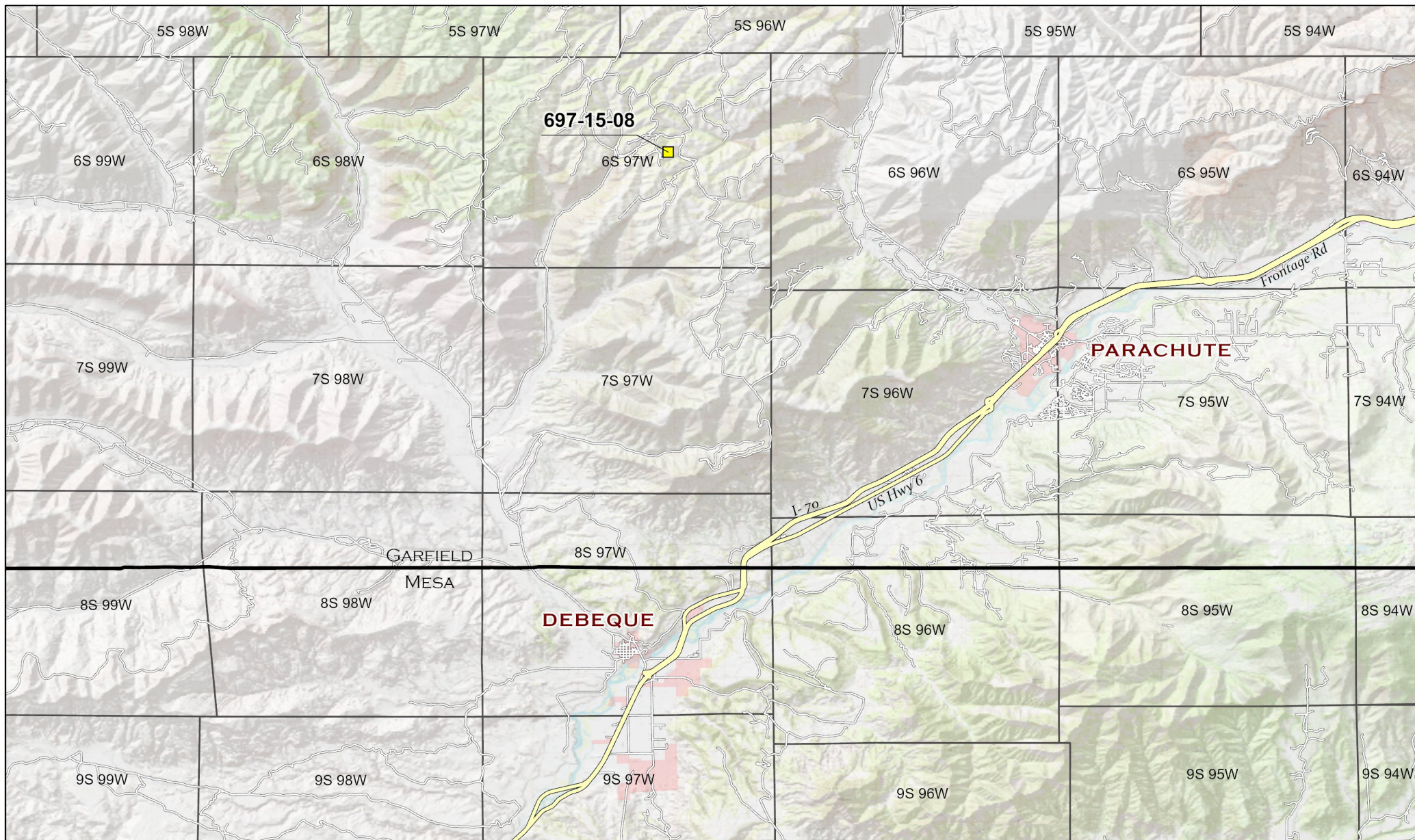
Rule 427.e. Cumulative Dust Impacts. *Based on review of dust mitigation plans submitted pursuant to Rule 427.a, the Commission may require Operators to adopt additional dust mitigation requirements to reduce cumulative dust impacts, based on the following considerations:*

Laramie shall implement dust abatement measures as needed to prevent cumulative dust impacts from vehicular traffic, equipment operations, or wind events. BMPs such creating efficient travel routes, reducing vehicular travel when possible, and observing wind and soil conditions will mitigate and minimize fugitive dust.

| List of Appendices | |
|---------------------------|---------------------|
| Appendix A | Vicinity Map |
| Appendix B | NRCS Soil Unit Maps |
| Appendix C | Layout Drawings |

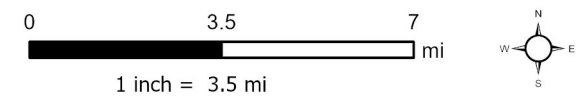
Appendix A

Vicinity Map



LEGEND

- Site Location



Project No: 021-036

Map By: NDB

Date: 4/13/2021

Vicinity Map

Cascade Creek 697-15-08 Pad
Laramie Energy
SENE, Section 15, T6S R97W, 6th P.M.
Garfield County, Colorado



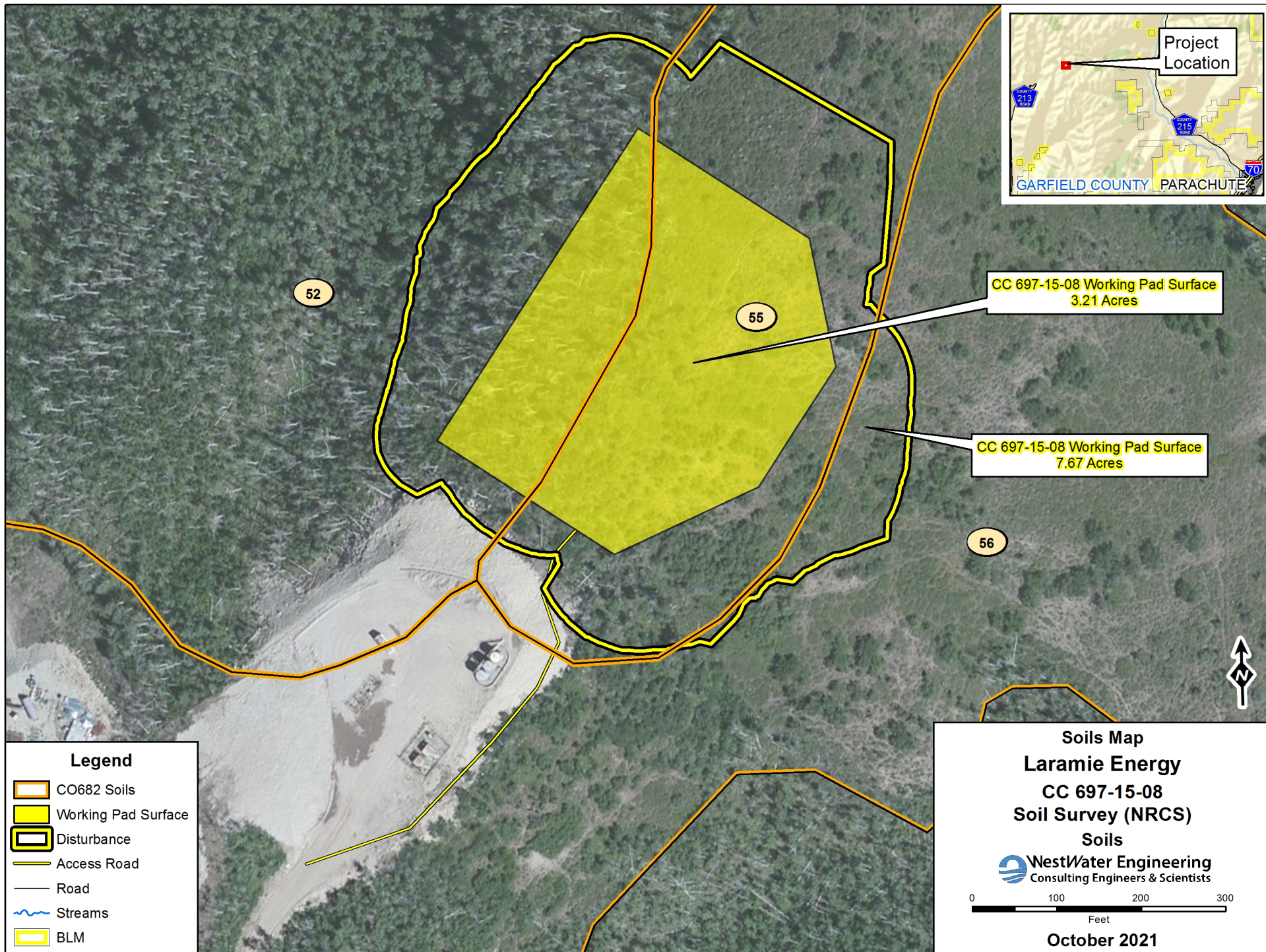
330 Grand Avenue, Unit C
Grand Junction, CO 81501
970-549-1015

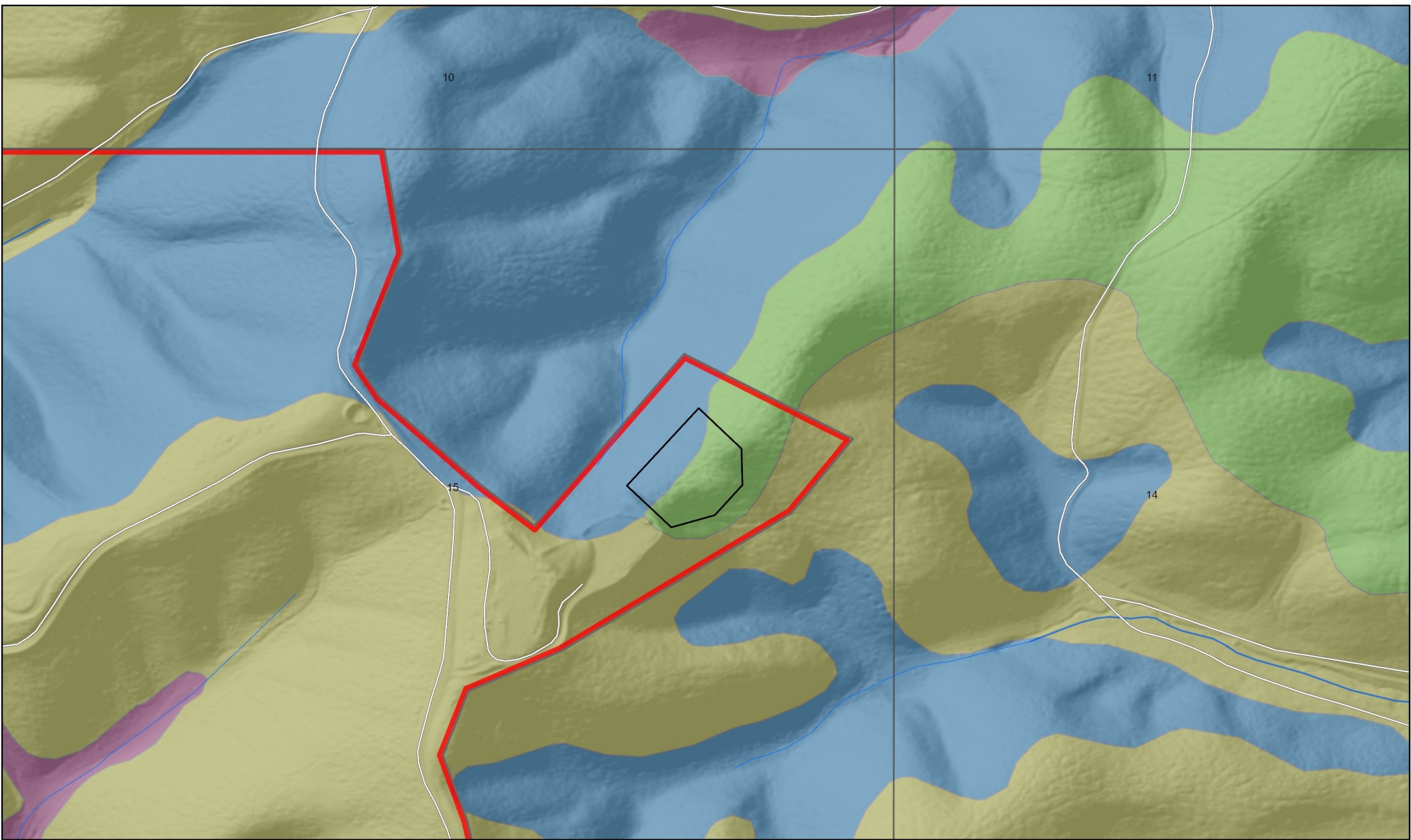
Figure

1

Appendix B

NRCS Soil Maps





LEGEND


- Northwater-Adel complex, 5 to 50 percent slopes
- Parachute-Irigul complex, 5 to 30 percent slopes
- Parachute-Irigul-Rhone association, 25 to 50 percent slopes MLRA 48A
- Silas loam, 1 to 12 percent slopes

Pad Boundary

0 600 1,200

Ft

1 inch = 600 ft

| | | | |
|---------------------|---|---|--------|
| Project No: 021-036 | NRCS Soils Map Cascade Creek 697-15-08 Pad Laramie Energy SENE, Section 15, T6S R97W, 6th P.M. Garfield County, Colorado |  <div>330 Grand Avenue, Unit C Grand Junction, CO 81501 970-549-1015</div> | Figure |
| Map By: NDB | | | 5 |
| Date: 4/13/2021 | | | |

Appendix C

Layout Drawings

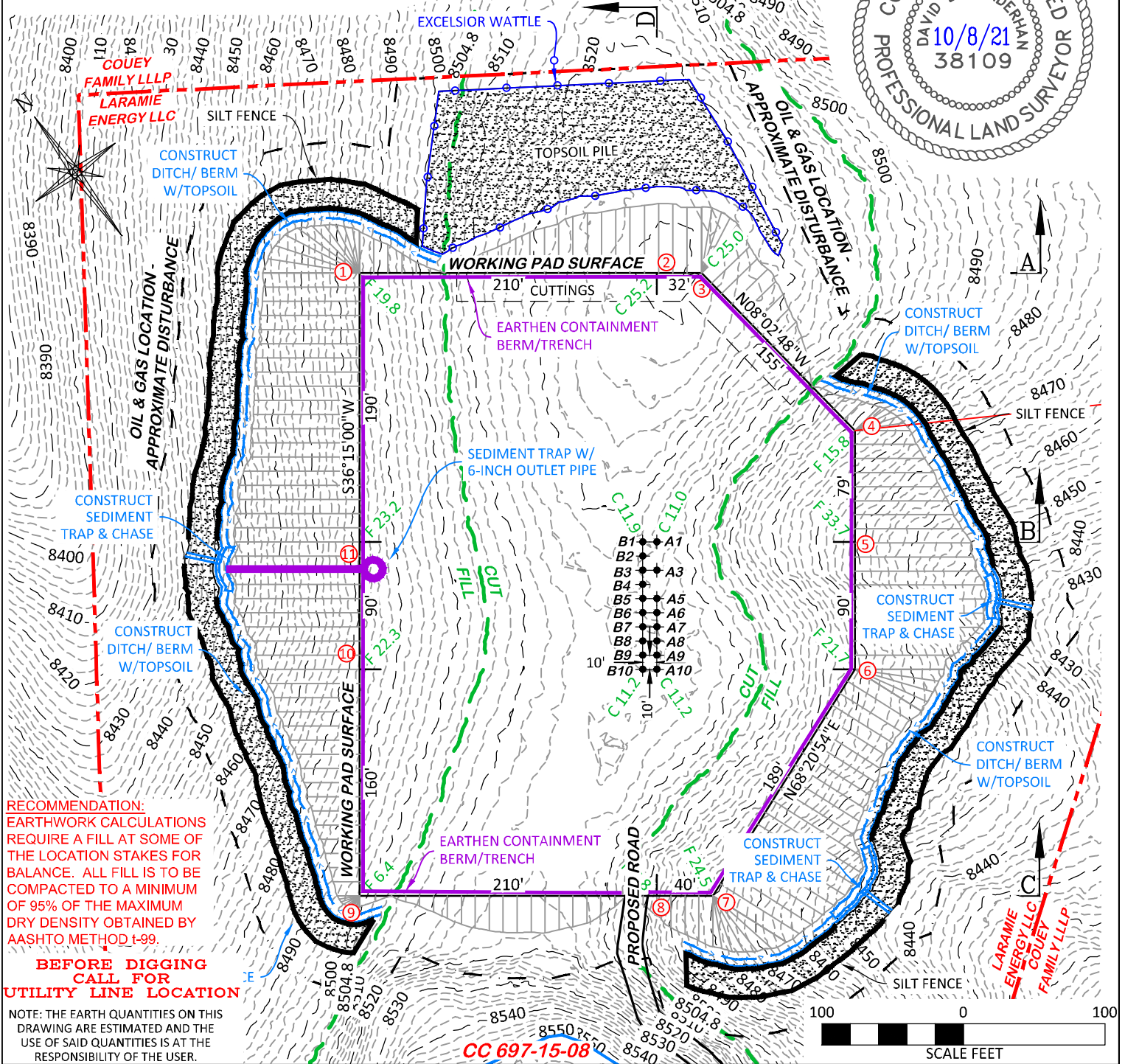
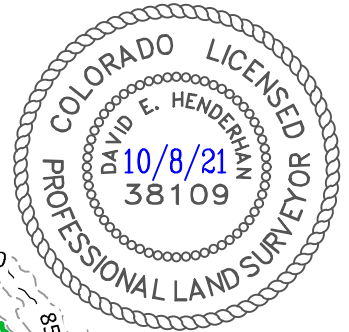
UNGRADED ELEVATION: 8515.8'

FINAL ELEVATION: 8504.8'

AREA OF DISTURBANCE: 7.6± ACRES

AREA OF WORKING PAD SURFACE: 3.2± ACRES

Proposed access road and pipeline will be installed within the CC 0697-15-08 Area of Disturbance and previously disturbed surface of the CC 697-15-23.



| ESTIMATED EARTHWORK BANK | | | | | ESTIMATED EARTHWORK LOOSE (25% SWELL) | | | | |
|--------------------------|-----------|------------|------------|--------------|---------------------------------------|-----------|------------|------------|-------------|
| ITEM | TOPSOIL | CUT | FILL | EXCESS | ITEM | TOPSOIL | CUT | FILL | EXCESS |
| PAD | 7,869 BCY | 37,178 BCY | 45,151 BCY | (15,842) BCY | PAD | 7,869 BCY | 46,473 LCY | 45,151 LCY | (6,547) LCY |
| PIT | | NONE | | NONE | PIT | | NONE | | NONE |
| TOTALS | 7,869 BCY | 37,178 BCY | 45,151 BCY | (15,842) BCY | TOTALS | 7,869 BCY | 46,473 LCY | 45,151 LCY | (6,547) LCY |

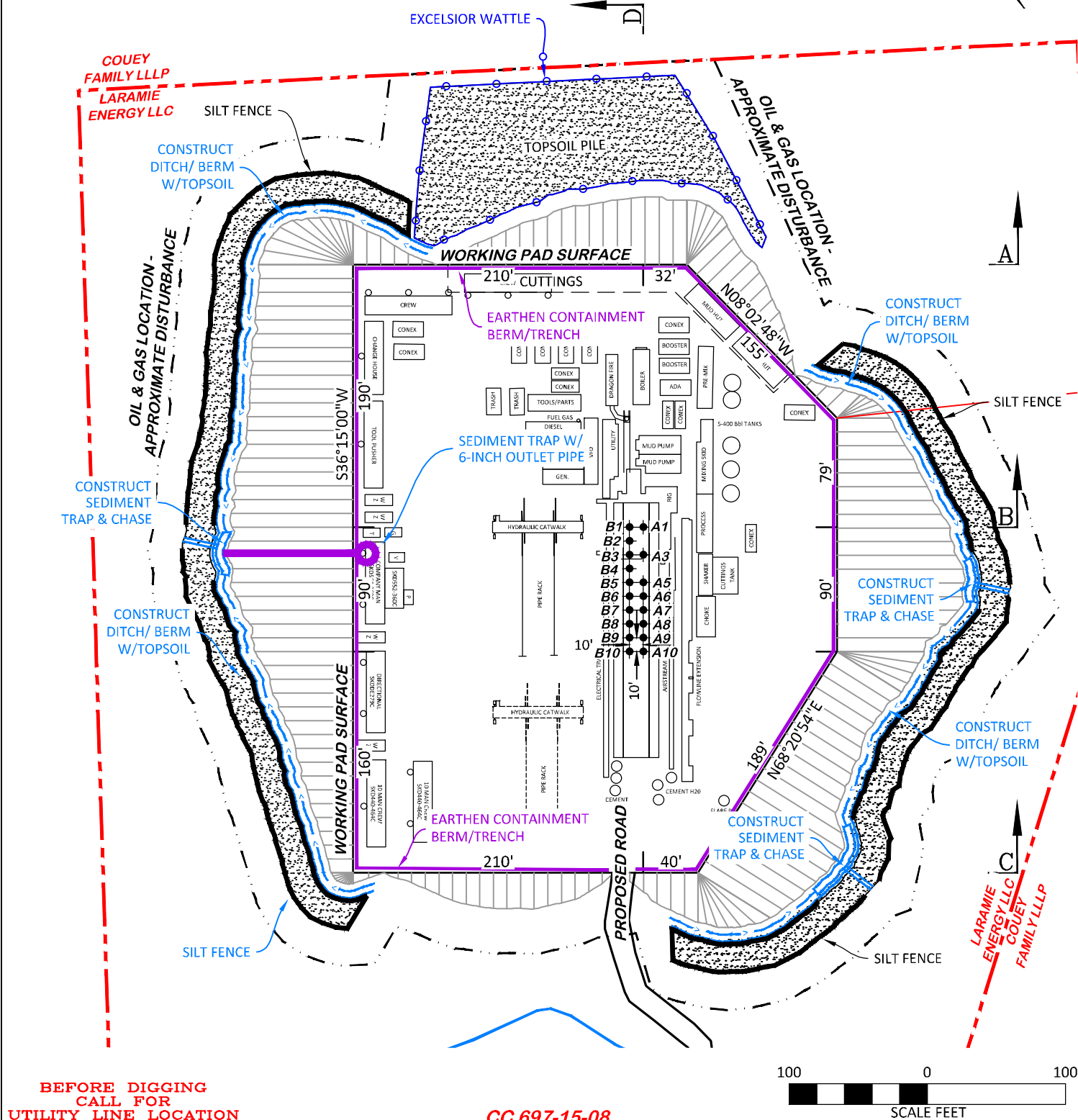
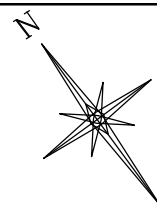
DRG RIFFIN & ASSOCIATES, INC.
(307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901

| | |
|--------------------------|-------------------|
| DRAWN: 12/8/2020 - DEH | SCALE: 1" = 100' |
| REVISED: 10/4/2021 - DEH | DRG JOB No. 22026 |
| COGCC RULE REVISIONS | 304B(7)BI CONST |

LAYOUT DRAWING 1 OF 7

**CONSTRUCTION LAYOUT DRAWING
ESTIMATED EARTHWORK
LARAMIE ENERGY, LLC.
CC 697-15-08
SENE, SECTION 15, T.6 S., R. 97 W., 6th P.M.,
GARFIELD COUNTY, COLORADO**

Proposed access road and pipeline will be installed within the CC 0697-15-08 Area of Disturbance and previously disturbed surface of the CC 697-15-23.



**BEFORE DIGGING
CALL FOR
UTILITY LINE LOCATION**

CC 697-15-08

100 0 100

SCALE FEET

DRG **RIFFIN & ASSOCIATES, INC.**
(307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901

LAYOUT DRAWING 3 OF 7

PRELIMINARY RIG LAYOUT
LARAMIE ENERGY, LLC.

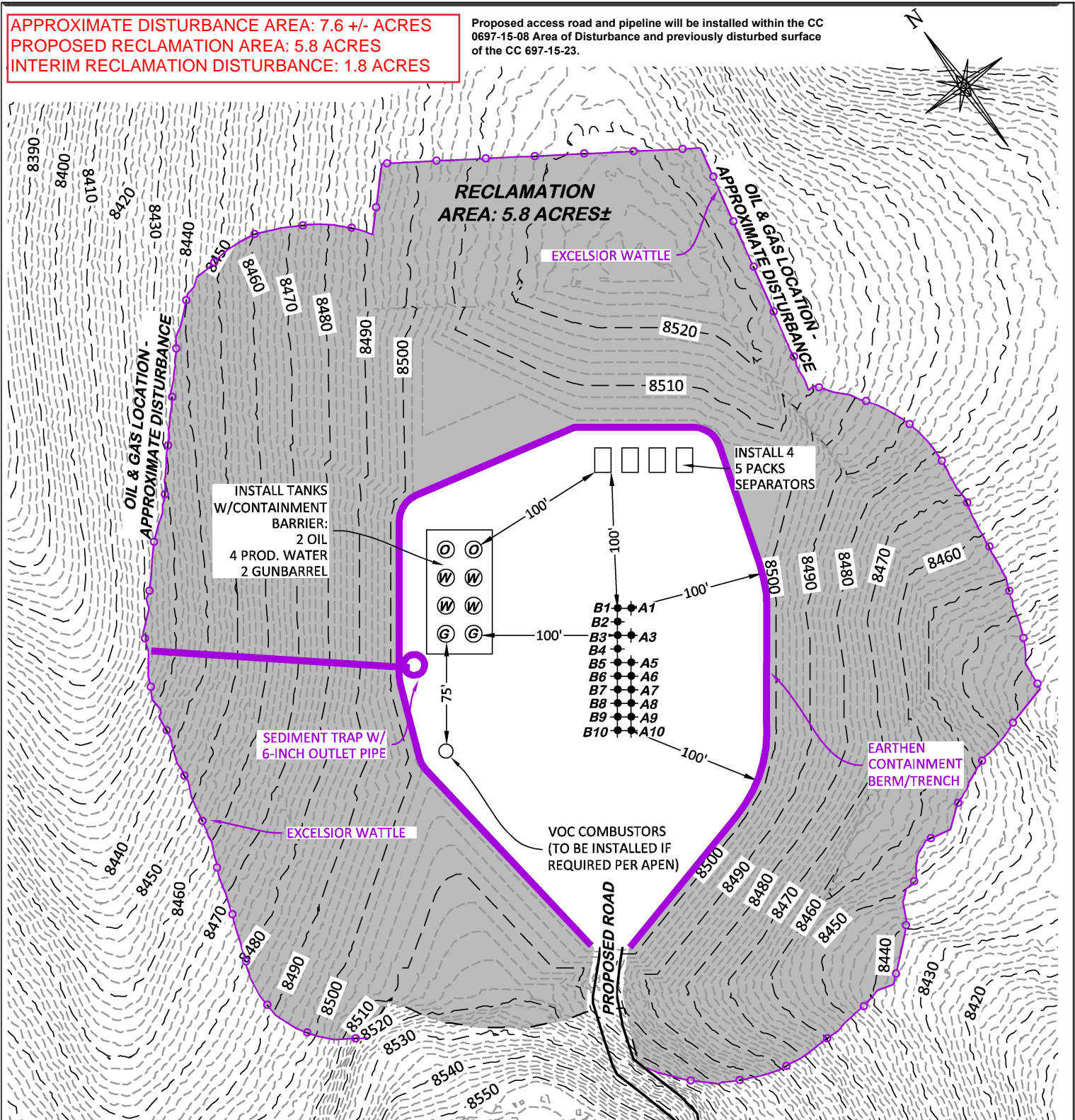
CC 697-15-08

**SENE, SECTION 15, T. 6 S., R. 97 W., 6th P.M.,
GARFIELD COUNTY, COLORADO**

| | |
|---------------------------------|--------------------------|
| <i>DRAWN: 12/8/2020 - DEH</i> | <i>SCALE: 1" = 100'</i> |
| <i>REVISED: 10/4/2021 - DEH</i> | <i>DRG JOB No. 22026</i> |
| <i>COGCC RULE REVISIONS</i> | <i>304B(7)BII RIG</i> |

APPROXIMATE DISTURBANCE AREA: 7.6 +/- ACRES
 PROPOSED RECLAMATION AREA: 5.8 ACRES
 INTERIM RECLAMATION DISTURBANCE: 1.8 ACRES

Proposed access road and pipeline will be installed within the CC 0697-15-08 Area of Disturbance and previously disturbed surface of the CC 697-15-23.



**BEFORE DIGGING
 CALL FOR
 UTILITY LINE LOCATION**

CC 697-15-08

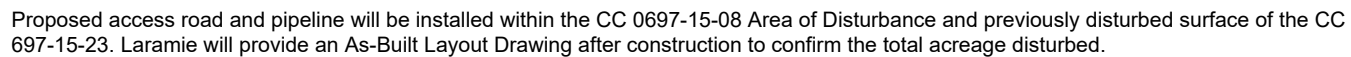


DRG RIFFIN & ASSOCIATES, INC.
 (307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901

| | |
|--------------------------|----------------------|
| DRAWN: 12/8/2020 - DEH | SCALE: 1" = 100' |
| REVISED: 10/4/2021 - DEH | DRG JOB No. 22026 |
| COGCC RULE REVISIONS | 304C(16) RECLAMATION |

FACILITY LAYOUT DRAWING - INTERIM RECLAMATION PLAN

**PROPOSED INTERIM RECLAMATION
 LARAMIE ENERGY, LLC.
 CC 697-15-08
 SENE, SECTION 15, T. 6 S., R. 97 W., 6th P.M.,
 GARFIELD COUNTY, COLORADO**



LARAMIE ENERGY, LLC.
CC 697-15-08

**SENE, SECTION 15, T.6 S., R.97 W., 6th P.M.,
GARFIELD COUNTY, COLORADO**

ESTIMATED EARTHWORK

| <i>CUT</i> | <i>FILL</i> | <i>EXCESS</i> |
|-----------------|---------------|-----------------|
| <i>6,949 CY</i> | <i>193 CY</i> | <i>6,756 CY</i> |

DRG

RIFFIN & ASSOCIATES, INC.
1414 ELK ST., ROCK SPRINGS, WY 82901

DRAWN: 12/8/2020 - DEH

SCALE: H - 1" = 60' V - 1" = 60'

REVISED: 10/4/2021 - DEH

DRG JOB No. 22026

COGCC RULE REVISIONS

304B(7)F ROAD PP