

**FEDERAL 299-23-3 PAD
FEDERAL RG 912-23-299D INJECTION WELL
PLAN OF DEVELOPMENT
TEP ROCKY MOUNTAIN LLC
RIO BLANCO, COLORADO**



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INTRODUCTION

TEP Rocky Mountain LLC (“TEP”) is proposing to drill, complete, and operate one (1) new Federal injection well (Federal RG 912-23-299D) from the Federal 299-23-3 pad located on Federal surface. The Federal 299-23-3 pad is an existing pad located in the NW¼SW¼ of Section 23, Township 2 South, Range 99 West, 6th P.M. The Federal 299-23-3 pad has one (1) existing plugged and abandoned (“P&A”) well (Federal 299-23-3 API# 05-103-10536), which was plugged on October 22, 2019. The proposed Federal RG 912-23-299D well will be directionally drilled and completed into Federal pore space located in the SW¼NW¼ of Section 23, Township 2 South, Range 99 West, 6th P.M.

The Federal 299-23-3 well pad would be reconstructed and expanded to accommodate the development of the Federal RG 912-23-299D injection well. The pad would be expanded slightly around the perimeter of the existing disturbance footprint to provide the required surface area for drilling and completions operations. The new RG 912-23-299D injection wellhead would be offset approximately fifteen (15) feet south west of the abandoned well on the Federal 299-23-3 pad. The existing access road from Rio Blanco County Road 68 would be used and would undergo maintenance during site re-construction to improve the driving surface prior to drilling and completion operations. The existing produced water pipeline system will be utilized to supply water to the location during well completion and injection operations.

TEP would complete the new injection well on location with water provided via an existing three-inch (3”) water pipeline which ties back into TEP’s existing water recycling and management system. TEP would pump water from the Mautz Ranch Multi-Well Pit (Pit 22-19-298; Loc ID: 422672) (“Mautz Ranch”), which is located on TEP’s surface in the SE¼NW¼ of Section 19, Township 2 South, Range 98 West, 6th P.M, to the Federal 299-23-3 pad. Flowback equipment will be placed on location during completions operations to process any returned flowback fluids during drill outs. Flowback fluids will flow through flowback separation equipment. Water will be delivered to temporary tanks on location and will be pumped from the tanks through existing pipeline infrastructure to Mautz Ranch for recycle or injection.

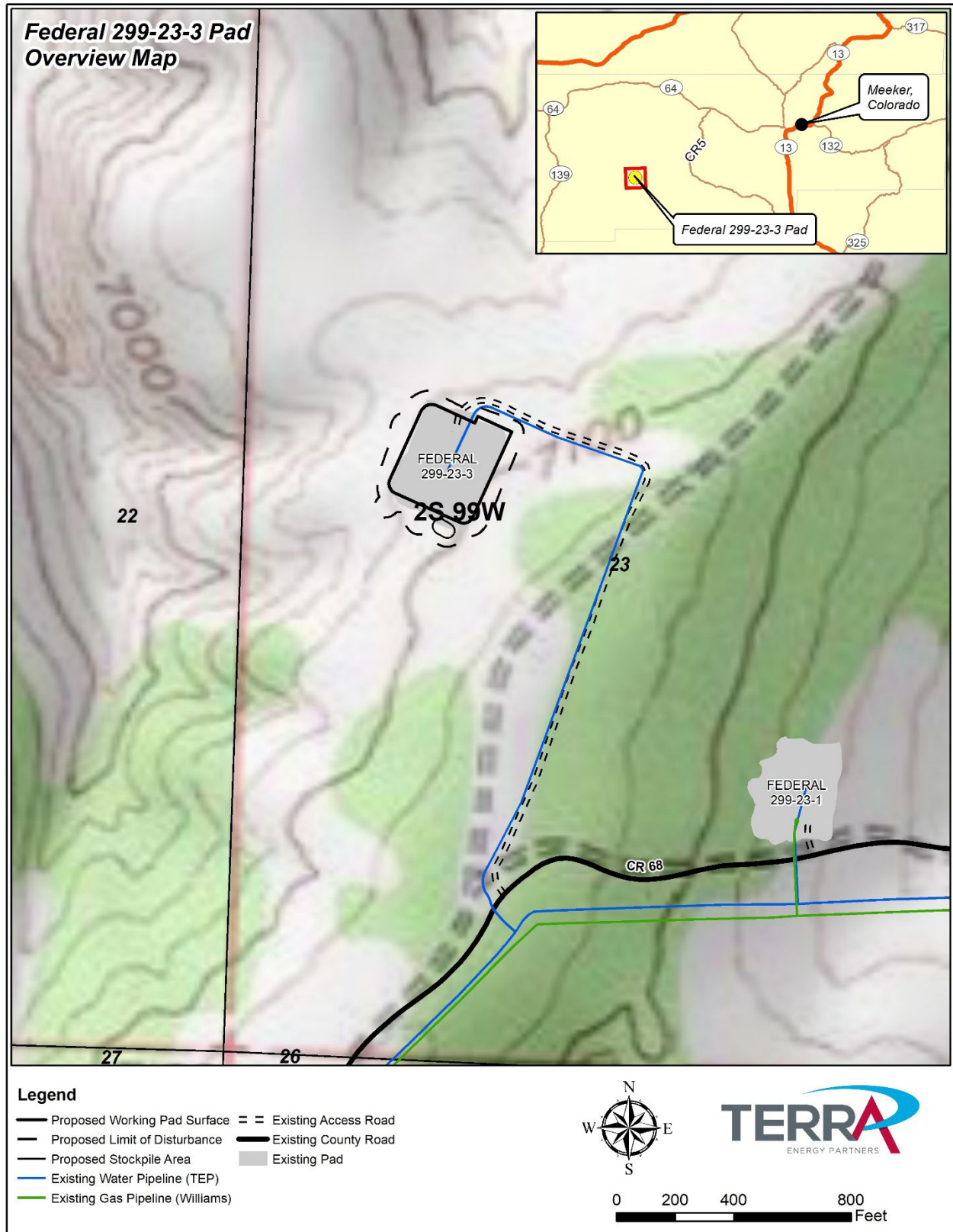
Following completion of well construction, produced water from existing producing wells within the Ryan Gulch and Barcus Creek Development Areas will be pumped or trucked to the Mautz Ranch for temporary storage and treatment. Incoming produced water will be further processed through existing equipment (i.e. gun barrels) to remove any residual hydrocarbons in the water before entering the multi-well pit. Produced water will then be pumped from the Mautz Ranch via the existing electric 600hp centrifugal pump through existing water pipelines to the Federal RG 912-23-399D injection well for disposal.

TEP is currently proposing to begin pad construction on the Federal 299-23-3 pad in April 2022. Pad construction is estimated to take approximately three (3) weeks to complete. Drilling and completions operations are currently scheduled to occur in May 2022. Interim reclamation of the Federal 299-23-3 pad would begin within six (6) months following completion of operations on the Federal RG 912-23-299D injection well. Interim reclamation activities would take approximately three (3) to six (6) weeks to complete. Development may be accelerated or delayed based on market conditions and company constraints.

Table 1. Well Pads and Wells List

Pad Name	Surface & Pore Space Ownership	Proposed Well Name
Federal 299-23-3 Pad	Bureau of Land Management	Federal RG 912-23-299D

Figure 1. Federal 299-23-3 Project Overview Map



EXISTING / PROPOSED SITE ACCESS

Existing roads, including private lease roads and public roads, would be utilized to access the location during construction and long-term operation of the proposed Federal RG 912-23-299D injection well on the Federal 299-23-3 well pad. The Federal 299-23-3 well pad is accessed from Rio Blanco County Road 68 ("CR 68"). Minor road maintenance would be performed along the existing lease roads during site construction to ensure the existing road is in good working condition for the proposed activities. Storm water controls along the existing access road between CR 68 and the site entrance will be evaluated during construction to ensure they are functioning properly. Additional controls may be evaluated with the surface owner during construction and implemented as needed.

The existing access road beginning at the intersection with CR 68 to the Federal 299-23-3 pad is approximately 0.44-miles in length. The entire length of the access road will be resurfaced with gravel during reconstruction of the well pad. The access road would be surfaced with six inches (6") of three-quarter inch (3/4") gravel or another surfacing material approved by the surface owner. The existing access road is located within a twenty-five foot (25') wide permanent right-of-way consisting of a twenty foot (20') wide driving surface with two- and one- half feet (2.5') to either side for storm water control ditches.

TEP will be responsible for periodic inspection and maintenance of the existing and proposed lease roads. TEP will conform to a schedule of preventative maintenance, which at a minimum, provides for the following measures on a biannual basis. Problem areas would be corrected as needed.

1. Road surface grading and application of surfacing materials, as needed.
2. Relief ditch, culvert, and cattle guard cleaning.
3. Erosion control measures for cut and fill slopes and all other disturbed areas.
4. Road closures during periods of excessive soil moisture to prevent rutting caused by vehicular traffic.
5. Road and slope stabilization measures as required.
6. All roads shall be maintained to the standards required for the construction of the road until final abandonment and rehabilitation takes place.

WELLSITE LAYOUT AND CONSTRUCTION

Federal 299-23-3 Well Pad

The Federal 299-23-3 pad would be re-constructed to provide the necessary working surface to support safe and efficient working conditions for all TEP employees and contractors during every phase of development, including drilling, completions, and injection operations. Prior to initial pad construction, TEP would have the proposed pad location staked for construction and will hold a pre-construction onsite with the excavation and storm water contractors to review proposed site construction.

TEP's storm water contractor would then install initial storm water control measures (i.e. waddles, straw bales, etc.) along the outer perimeter of the proposed disturbance boundary. TEP's construction contractor would then begin removal of existing vegetation within the disturbance footprint by hydro-axing or brush hogging the trees or larger bushes within the project disturbance boundary. Storm water control measures, such as sediment traps and diversion ditches, will then be installed along the perimeter of the site prior to pad excavation.

Topsoil within the pad disturbance footprint will then be stripped and stockpiled along the south end of the pad location. Topsoil would be stripped to a depth of approximately six-inches (6") and would be segregated

from all other subsurface materials for use during reclamation. Wattles will be placed around the perimeter of the topsoil stockpile to prevent migration of organic materials from the stockpile.

Excavation of the pad would then commence and will be constructed based on the construction layout attached to the Form 2A. A perimeter berm and drive over berm will be constructed around the fill side of the pad location and around the cuttings management area. A drive over berm will be constructed at the pad entrance.

The proposed well conductor pipe would then be installed and a cellar ring will be installed around the conductor pipe. A steel grate will be installed over the cellar ring to prevent unintentional access to the cellar. The existing three-inch (3") water pipeline will be extended and a riser will be installed adjacent to the conductor pipe. The area beneath the proposed rig footprint, approximately forty feet (40') from the proposed cellar, will be compacted to ensure stability of the rig during drilling operations. The pad working surface will be bladed level and graveled with six-inches (6") of three quarter inch minus (3/4" minus) surfacing materials imported from one or more local gravel pits.

The cut and fill slopes, excess stockpile, and topsoil stockpile will be hydro-seeded / mulched following completions of pad construction to minimize the potential for site degradation during the initial drilling and well completion phase of the project.

Source of Construction Materials

Surface materials within the proposed construction area would be segregated and preserved and utilized during site reclamation. Subsoil materials within the proposed construction areas would be used for construction of the oil and gas location. Additional gravel would be obtained from the United White River gravel pit location in Section 36 of Township 2 North, Range 97 West, 6th P.M. Please see Table 2, Construction Material Source Table, for additional details.

Table 2. Construction Material Source Table

<i>Material Type</i>	<i>Location/Company Name</i>	<i>Street Address</i>	<i>City</i>	<i>State</i>	<i>Zip Code</i>	<i>Latitude</i>	<i>Longitude</i>	<i>Legal Description</i>
Surface (Topsoil)	On Site Material	--	--	--	--	--	--	On Site
Subsurface	On Site Material	--	--	--	--	--	--	On Site
Gravel	United White River	41253 CR 5	Meeker	Colorado	81641	40.091583	-108.227879	Section 36 of Township 2 North, Range 97 West, 6 th P.M.

PROPOSED PIPELINES

Permanent Pipelines

TEP operates an existing three-inch (3") FlexSteel (3000psi) water injection pipeline, which ties into an existing six-inch (6") FlexSteel water pipeline adjacent to County Road 68. The existing six-inch (6") water pipeline follows an existing pipeline corridor back to TEP's existing injection facility at the Mautz Ranch. These existing water pipelines will be used to supply water to the Federal 299-23-3 pad during well completion and injection operations.

No new off-location pipelines would be required for construction or operation of the proposed injection well. The existing three-inch (3") FlexSteel (3000psi) water line will be extended on pad and riser will be installed adjacent to the proposed Federal RG 912-23-299D injection well.

Temporary Pipelines

No temporary surface pipelines, other than those required for on-location operation of drilling and completion equipment, would be required for construction or operation of the proposed injection well.

PROPOSED DRILLING OPERATIONS

Drilling operations on the Federal 299-23-3 pad will be conducted in a manner that minimizes the potential impacts to public health, safety, the environment, and wildlife resources. A closed loop drilling system will be used during drilling of the proposed well on the Federal 299-23-3 pad.

Drill cuttings generated during drilling operations on the Federal 299-23-3 pad will be managed within a cuttings management area constructed in the northeast corner of the pad. The cuttings management area would be approximately one-hundred feet (100') in length by fifty feet (50') in width. Drill cuttings are estimated at eight hundred cubic yards (800cy). The cuttings management area has been designed to accommodate the total estimate cuttings volume from the proposed well. The cuttings management area would be constructed with a two- and one-half foot (2.5') high perimeter berm along the west and south sides of the cuttings management area to ensure containment of drill cuttings.

Drill cuttings will be managed as described in the Waste Management Plan attached to the Form 2A and will be managed in accordance with all Federal, State, and local regulations.

Source Water for Drilling Operations

Fresh water required for drilling operations (surface, intermediate, and production casing) and dust control, would be transported by truck from the Mautz Ranch Fresh Water Pond. The Mautz Ranch Fresh Water Pond is located along Ryan Gulch on TEP property north of County Road 86. Water trucks would utilize existing county and lease roads and would follow existing truck routes where applicable. The intake on the water pumps at the source locations would be fitted with a quarter-inch (0.25") mesh screen to prevent impacts to aquatic wildlife. TEP estimates that approximately 5,000bbls of fresh water would be used for drilling operations and dust control. Please see the Water Plan for more specific details regarding water sources and source water characteristics.

PROPOSED WELL COMPLETION OPERATIONS

Well completion operations will be conducted on-location following completion of drilling operations and following removal of all rig equipment. Produced water will be transported from the Mautz Ranch to the Federal 299-23-3 pad via one (1) existing six-inch (6") FlexSteel water pipeline and one (1) existing three-inch (3") FlexSteel water pipeline. Temporary completions equipment including frac tanks, blenders, sand silos, and pumps will be temporarily staged on the Federal 299-23-3 pad during well completion operations.

Flowback operations will not occur for the proposed injection well. However, flowback equipment will be located on site during drill out operations to receive and process any potential flowback fluids. Any fluids generated during drill outs will be processed through one (1) four (4) phase separator to separate gas, water, condensate, and sand. Any gas produced would be sent directly to an enclosed combustor for incineration.

Water would be sent back to the temporary frac tanks and then pumped back to the Mautz Ranch for treatment. Condensate would be temporarily stored in a tank on-location and transported via truck to storage tanks at the Mautz Ranch. Any returned frac sand will be mixed with the drill cuttings in the cuttings management area or transported to a third-party disposal facility. The Federal RG 912-23-299D well is an injection well and fluid returns during drill out operations are expected to be minimal.

Federal 299-23-3 Pad: Temporary Frac Equipment

The following equipment will be temporarily installed on the Federal 299-23-3 pad and operated during well completion operations for the proposed injection well:

1. Produced Water Frac Tanks: Thirty (30) four-hundred-and-fifty-barrel (450bbl) capacity.
2. Completions Pumps: Eight (8)
3. Sand Siloes: Three (3)
4. Enclosed Combustion Device: One (1)
5. Blender: One (1)
6. Transfer Pump: One (1)

Federal 299-23-3 Pad: Temporary Flowback Equipment

The following equipment will be temporarily installed on the Federal 299-23-3 pad and operated, only if required, during well completion operations for the proposed injection well:

1. One (1) High Pressure Four Phase Separator
2. One (1) Low Pressure P-Tank
3. Three (3) Enclosed Water Tanks
4. One (1) Water Pump
5. One (1) Emission Combustion Device (Low Pressure)

Source Water for Completion Operations

Well completion operations would be conducted utilizing recycled produced water from other producing natural gas wells operated by TEP, which is stored and managed at TEP's produced water recycling facilities in Ryan Gulch. Recycled produced water would be transported from Mautz Ranch to the Federal 299-23-3 pad via existing pipeline infrastructure. Please see the attached Water Plan for more specific details regarding water sources and source water characteristics.

EXISTING AND PROPOSED PRODUCTION FACILITIES

Production Equipment

TEP will install wellhead telemetry and other wellhead specific equipment on the Federal RG 912-23-299D injection well to support injection operations. An automation system will be utilized to control, monitor, and track injection pressures and rates. The system will incorporate real-time data acquisition and monitoring. To support injection operations, pressure sensors and pressure control equipment will be added to the wellhead, and a winterization package will be installed to protect the wellhead.

TEP will utilize the existing Mautz Ranch and existing injection facility for water management and pumping operations associated with the Federal RG 912-23-299D injection well. Production facilities at Mautz Ranch includes one (1) existing ninety-four thousand six hundred and eighty barrel (94,680bbl) centralized produced water pit (Facility ID: 428428), tank battery for produced water and condensate

storage, filter pods, and one (1) electric centrifugal pump. Please see the attached Mautz Ranch Multi-Well Pit As-built Site Plan for additional details.

Table 3. Production Equipment Details

Pad Name	Equipment Description	Equipment Count	Capacity	Status	COGCC Class
Federal 299-23-3	Injection Well	1	NA	Proposed	Major Equipment
Federal 299-23-3	Solar Panels / Battery Package	1	NA	Proposed	Other Equipment
Federal 299-23-3	Propane Tank	1	500 gal	Proposed	Other Equipment
Federal 299-23-3	Cataflow (Heat Trace System)	1	NA	Proposed	Other Equipment

PROJECT DISTURBANCE

The Federal 299-23-3 Pad Oil and Gas Development Plan involves the re-construction of the existing Federal 299-23-3 pad for the construction and operations of the Federal RG 912-23-299D injection well.

The existing Federal 299-23-3 pad will be reconstructed to a total disturbance of 4.18-acre to support drilling and completions operations. Of the 4.18-acres of disturbance, approximately 0.49-acres would be attributed to existing disturbance, 1.87-acres would be attributed to re-disturbance (disturbance within area previously disturbed and reclaimed by oil and gas operations), and 1.82-acres would be attributed to new disturbance. The existing 0.83-acre access road to the Federal 299-23-3 pad would remain in place. Long-term disturbance attributed to the Federal 299-23-3 pad would be approximately 0.70-acres.

Please see Table 4, Proposed Disturbance for Project Components, for a full breakdown the proposed surface disturbance acreage for each component of the development plan.

PROPOSED SURFACE RECLAMATION

Interim reclamation of the Federal 299-23-3 pad will begin within six (6) months following completion of drilling and well completion operations or during the following growing season. Interim reclamation may be delayed due to weather conditions. Interim reclamation of the Federal 299-23-3 pad is expected to take approximately three (3) to six (6) weeks to complete. TEP has prepared a Reclamation Plan which describes the methods to be employed during interim reclamation of the Federal 299-23-3 pad following completion of well construction. This plan also describes the methods to be employed during final reclamation once the proposed injection well reaches the end of its usable lifespan and has been plugged and abandoned. The reclamation plan also describes how reclamation monitoring will be conducted. Reclamation monitoring will be conducted per the 2015 Oil and Gas Resource Management Plan Amendment, Appendix 3, Surface Reclamation Plan. Please refer to the Reclamation Plan attached to the Form 2A for additional details.

Additionally, TEP has prepared a Topsoil Protection Plan which describes the procedures for segregating topsoil and organic matter during initial construction and replacing this material during interim reclamation to provide a suitable medium for re-establishment of desirable vegetation. The topsoil protection plan also includes a Weed Management Plan which describes the methods to be used to minimize the presence of noxious weeds at the oil and gas location. Please refer to the Topsoil Protection Plan is attached to the Form 2A for additional details.

Noxious weeds which may be introduced due to soil disturbance during reclamation would be treated by methods approved by BLM and COGCC. The Pesticide Use Permit will be on record with the BLM for treatment of noxious weeds.

Table 4. Proposed Disturbance of Project Components

<i>Well Pad</i>	<i>Surface Ownership</i>	<i>Number or Length (feet) (Federal/Private)</i>	<i>Existing Disturbance (acres) (Federal/Private)</i>	<i>Re-disturbance (acres) (Federal/Private)</i>	<i>New Disturbance (acres) (Federal/Private)</i>	<i>Total Short-Term Disturbance (acres) (Federal/Private)</i>	<i>Long Term Disturbance (acres) (Federal/Private)</i>
Well Pad/Support Pads							
Federal 299-23-3 Pad	Federal	1/0	0.49/0[0.49]	1.87/0[1.87]	1.82/0[1.82]	4.18/0[4.18]	0.7/0[0.7]
Subtotal		1/0	0.49/0[0.49]	1.87/0[1.87]	1.82/0[1.82]	4.18/0[4.18]	0.7/0[0.7]
Grand Total (Fed/Fee)¹			0.49/0[0.49]	1.87/0[1.87]	1.82/0[1.82]	4.18/0[4.18]	0.7/0[0.7]

¹ Approximately 56% of the proposed project disturbance would be on land previously disturbed.

SURFACE OWNERSHIP

Implementation of the development plan detailed above would occur entirely on Federal surface managed by the BLM. Existing facilities at Mautz Ranch, located on TEP surface, will be used to support long-term operation of the proposed injection well. TEP has consulted with BLM on this development plan and has obtained approval for the activities described in this plan. The surface owner contact information is available in Table 5, Surface Ownership Information.

Table 5. Surface Ownership Information

Project Components	Surface Owner	Fee Owner Name	Fee Owner Address	Fee Owner Phone
Federal 299-23-3 Pad Existing Access Road Existing Water Pipeline	Federal	Bureau of Land Management White River Field Office	220 E. Market St. Meeker, Colorado 81641	970-878-3800

BLM Rights-of-Way (“ROW”)/Temporary Use Permit (“TUP”) Requirements:

The following ROW/TUPs would be required for the development of the proposed Federal RG 912-23-299D injection well on the existing Federal 299-23-3 pad which is located BLM surface:

1. *BLM Right-of-Way Grant for Proposed Federal RG 912-23-299D Injection Well (COC-76535):* Grant would include reconstruction of the existing Federal 299-23-3 pad, access to the facility, drilling, completions, and injection operations for the Federal RG 912-23-299D injection well. The ROW grant was initiated for the above-mentioned actions following submittal of the well name change sundry for the RG 943-27-299D submitted August 10, 2018. The existing Federal 299-23-3 pad is located within the NW¼SW¼ of Section 23, Township 2 South, Range 99 West, 6th P.M. and is accessed from Rio Blanco County Road 68. The bottom hole location for the proposed Federal RG 912-23-299D injection well would be located within SW¼NW¼ of Section 23, Township 2 South, Range 99 West, 6th P.M. BLM issued the ROW on September 30, 2020.

Private Landowner Surface Use Agreements/ROWs:

All components of the Federal RG 912-23-299D Injection well project will be located on BLM surface. No private landowner SUA's or ROW's would be required.

FEDERAL STIPULATIONS/CONDITIONS OF APPROVAL

The Federal 299-23-3 pad is located on Federal surface and will be operated in compliance with all stipulation listed in the approved Federal Application for Permit to Drill (“APD”) and Right-of-Way (“ROW”) grant. Please see the Federal APD approved on October 22, 2020, and ROW grant approved on September 30, 2020, for a detailed list of conditions of approval applicable to the Federal 299-23-3 pad and the Federal RG 912-23-299D injection well.

RESOURCE SURVEYS

Resource surveys have been completed for all components of the Federal 299-23-3 pad development plan as outlined below. All surveys have been complete by a BLM approved contractor.

1. Special Status Species Plant Survey: Completed June 2019
2. Noxious Weed Survey: Completed June 2019
3. Wildlife Survey: Completed June 2019
4. Vegetation Assessment: June 2021

PRE-APPLICATION CONSULTATION SUMMARY

In early 2014, WPX Energy Rocky Mountain, LLC (“WPX”) initiated planning of a new oil and gas location, the RG 34-27-299 pad, located in the SW¼SE¼ of Section 27, Township 2 South, Range 99 West, 6th P.M. and submitted APDs for the development of three (3) injection wells. Following submittal of the APDs, BLM evaluated potential resource impacts and identified that the oil and gas location was within Greater Sage Grouse habitat and in close proximity to a Sage Grouse Lek site. BLM deferred approval of the three (3) APDs and notified the operator in 2016 of requirements to survey sensitive resources or relocate the wells to a different location outside of Sage Grouse habitat. After TEP acquired the Piceance asset, one of three APDs were retained and relocated outside of Sage Grouse habitat to the existing Federal 299-23-3 pad. BLM agreed that this location provided adequate protections for Sage Grouse as the location is outside the Sage Grouse habitat.

On March 3, 2020, TEP met with representative from BLM to review the updated development plan for the Federal 299-23-3 pad and detailed the intent to conduct resource surveys in May 2020 in preparation for the Environmental Analysis. The Federal 299-23-3 pad was surveyed in May 2020 and was included in TEP’s Lower Wagonroad Ridge Master Development Plan. BLM completed the EA and Record of Decision in September 2020. The name of the original proposed injection well was the Federal RG 943-27-299D, however TEP requested two name changes upon relocating the well to the Federal 299-23-3 pad. BLM approved the original APD for the Federal RG 943-24-299D on October 22, 2020 and approved the most recent name change sundry on November 30, 2020 changing the well name to the Federal RG 912-23-299D. The Right-of-Way associated with the injection well was approved on September 30, 2020.

COGCC OIL AND GAS LOCATION ASSESSEMENT REVIEW

Local Government Siting Disposition (Rule 304.b.(1))

The existing Federal 299-23-3 Pad is located in the NW¼SW¼ of Section 23, Township 2 South, Range 99 West, 6th P.M. on public lands managed BLM in Rio Blanco County Colorado. TEP contacted Rio Blanco County, the Relevant Local Government with jurisdiction over the siting of oil and gas locations within the county and has determined that Rio Blanco County is the Relevant Local Government with land use authority over the siting of this Oil and Gas Location. Per the Rio Blanco County Land Use Regulations, TEP submitted a Well Pad Special Use / Building Permit (“SUBP”) on September 1, 2020 and received approval of SUBP No. COGW-0006-20 on September 4, 2020, which is attached to the Form 2A.

The Local Government Designee for Rio Blanco County is Edward Smercina. The contact information is listed below.

Table 6. Surface Ownership Information

Relevant Local Government	Zoning	LGD	Phone	Email
Rio Blanco County, Colorado	Agriculture	Edward Smercina	(970) 878-9586	edward.smercina@rbc.us

Alternative Location Analysis (Rule 304.b.(2))

As described under Rule 304.b.(2).A, an Alternative Location Analysis (“ALA”) is only required for an Oil and Gas Location that “meets any of the criteria listed in Rule 304.b.(2).B.

1. Working Pad Surface is within 2000 feet of Residential Building Unit: No
2. Working Pad Surface is within 2000 feet of HOBUs: No
3. Working Pad Surface is within 2000 feet of School Facility: No
4. Working Pad Surface is within 2000 feet of Child Care Center: No
5. Working Pad Surface is within 1500 feet of DOAA: No

6. Working Pad Surface is within 2000 feet of Municipal or County Boundary: No
7. Working Pad Surface is within a Floodplain: No
8. Working Pad Surface is within 2000 feet of Residential Building Unit: No
9. Oil and Gas Location is within a Surface Water Supply Area: No
10. Oil and Gas Location is within 2640 feet of a Type III Well or GUDI Well: No
11. Oil and Gas Location is within boundary or immediately upgradient of wetland / riparian: No
12. Oil and Gas Location is within High Priority Habitat: No
13. Surface Owner Protection Bond Proposed to Access the Oil and Gas Location: No
14. Working Pad Surface is within 2000 feet of RBU, HOBu, or School Facility within a DIC: No

Per Rule 304.b.(2), an Alternative Location Analysis is not required for the Federal 299-23-3 pad.

Cultural Distances (Rule 304.b.(3))

Please see the Cultural Distance Map and Table attached to the Form 2A for a map of cultural features within one (1) mile and a table describing the distance from the edge of the proposed working pad surface to the edge or corner of the nearest building, Residential Building Unit, High Occupancy Building Unit, and School Facility; the nearest boundary of a Designated Outside Activity Area; and the nearest public road, above ground utility, railroad, and property line. Any distances that are in excess of one (1) mile from the proposed working pad surface have been noted as greater than one (1) mile (>5280).

Please see the Cultural Distance Table and Map attached to the Form 2A, for additional information required under Rules 304.b.(3).A and Rule 304.b.(3).B.

Location Pictures (Rule 304.b.(4))

As required by Rule 304.b.(4).A, four (4) color photographs of the staked Federal 299-23-3 pad were taken on June 11, 2021 in each cardinal direction. Additionally, TEP has prepared a map that indicates the field of view for each photograph. The Location Pictures and Location Pictures Field of View Map have been attached to the Form 2A.

Site Equipment List (Rule 304.b.(5))

Please see Table 3, Production Equipment Details, in the Proposed Production Facilities section above for a description of the proposed equipment to be utilized on the Federal 299-23-3 pad during injection operations.

Flowline Descriptions (Rule 304.b.(6))

TEP does not have any plans to install and operate any new on-location or off-location flowlines during development of the proposed injection well on the Federal 299-23-3 pad. The existing three-inch (3") FlexSteel (3000psi) water pipeline will be slightly extended and a riser will be installed adjacent to the proposed Federal RG 912-23-299D injection well.

Drawings (Rule 304.b.(7))

TEP has prepared and attached the following drawings, maps, and figures to the Form 2A as required by Rule 304.b.(7) and applicable guidance:

- A. Location Drawing
- B. Layout Drawings:
 - a. Construction Layout
 - b. Wellhead Detail
 - c. Construction Layout Cross Sections

- d. Final Construction Grading
- e. Preliminary Rig Layout
- f. Preliminary Well Completion and Stimulation / Flowback Layout Drawing
- g. Interim Reclamation Layout
- h. Interim Reclamation Layout Cross Sections
- i. Oil and Gas Facilities Layout Drawing – Construction
- j. Oil and Gas Facilities Layout Drawing – Interim Reclamation
- C. Wildlife Habitat Drawings
- D. Process Flow Diagrams
 - a. Well Completion Operations
 - b. Flowback Operations
 - c. Injection Operations
- E. Hydrology Map
- F. Access Road Map (includes Haul Route Map)
- G. Related Location and Flowline Map
- H. Directional Well Plat
- I. Geologic Hazard Maps & Report

Geographic Information System Data (Rule 304.b.(8))

Geographic information system (“GIS”) data depicting the outer boundary of the entire proposed Oil & Gas Location and the working pad surface of the proposed Federal 299-23-3 pad has been attached to the Form 2A. The coordinate system of the GIS data provided is NAD 1983 State Plane Colorado Central FIPS 0502.

Land Use Description (Rule 304.b.(9))

The proposed Federal 299-23-3 pad is located in the NW¼SW¼ of Section 23, Township 2 North, Range 99 West, 6th P.M. and has a current Federal land use designation of rangeland / recreational. The property in the immediate vicinity of the Oil and Gas Location is primarily used for cattle grazing but is also periodically used for recreation, including hunting. The surface owner does not intend to modify the current land use. Therefore, the final land use designation will remain as rangeland / recreational.

The Federal 299-23-3 pad is located on Federal surface within Rio Blanco County, Colorado zoned as Agricultural. As described in Article 3, Section 3-202 of the Rio Blanco County Land Use Code, “Oil and Gas Operations – No Significant Impact” on lands zoned as Agricultural would require an Administrative Review and submittal of a Well Pad Special Use / Building Permit and therefore Rio Blanco County approval is required for the proposed activities. As stated above, TEP received approval of the Well Pad SUBP on September 4, 2020.

WestWater Engineering, Inc. prepared a Biological Survey Report for the Federal 299-23-3 pad in July 2021. This report included a vegetation assessment at the reference area to determine the dominant plant species within the proposed project area. This report includes the reference area map, reference area photos, and a list of dominant vegetation within the reference area as required per Rule 304.b.(9). The Biological Survey Report has been attached to the application.

NRCS Map Unit Description (Rule 304.b.(10))

The National Resources Conservation Service (NRCS) soil map unit description(s) and a soils map have been attached to the Form 2A as required by Rule 304.b.(10).

Best Management Practices (Rule 304.b.(11))

COGCC 100 Series Rule defines Best Management Practices (BMPs) as “...practices that are designed to prevent or reduce impacts caused by oil and gas operation to public health, safety, welfare, the environment, and wildlife.” TEP is committed to conducting operations in a manner that is protective to these resources and has included BMPs in several of the required plans to describe practices that will be employed during development and operation of the proposed injection well on the Federal 299-23-3 pad. Furthermore, TEP has consulted with the Bureau of Land Management regarding activities described in this Plan of Development and will operate under the conditions of approval and stipulations attached to the approved APD and ROW grant.

Surface Owner Information (Rule 304.b.(12))

Please see the Surface Ownership section above for a detailed summary of surface ownership within the scope of the Federal 299-23-3 Oil and Gas Development Plan.

Proximate Local Government Information (Rule 304.b.(13))

During the development planning for the proposed Federal 299-23-3 pad, TEP did not identify any Proximate Local Governments within 2,000 feet of the proposed Oil and Gas Location. The Relevant Local Government is Rio Blanco County as mentioned above.

Wetlands (Rule 304.b.(14))

WestWater biologists surveyed the project area for aquatic resources including springs, seeps, wetlands, and Waters of the United States (“WoUS”) crossings that would fall under the jurisdiction of the ACOE or would be considered Waters of the State (“WoS”) in conjunction with other surveys that were conducted for this project. WestWater determined that the project would not have any direct impact to WoUS/WoS. The survey did identify WoUS/WoS within one half (½) of the working pad surface. Please see the Biological Survey for additional detail regarding wetlands.

School and Child Care Centers (Rule 304.b.(15))

During initial planning for the proposed Federal 299-23-3 pad, TEP reviewed Rio Blanco County assessor information and the Colorado Department of Human Services childcare facility database to determine if any School Facilities or Child Care Centers were within 2,000 feet of the proposed Oil and Gas Location. This review determined that there are no School Facilities or Child Care Centers within 2,000 feet of the proposed Federal 299-23-3 pad.

Emergency Spill Response Program (Rule 304.c.(1))

The Working Pad Surface of the proposed Federal 299-23-3 pad is not within 2,640 feet of a GUDI well, a Type III Well as defined by Rule 411.b.(1).B and 411.b.(1).D, or a surface water feature segment that is fifteen (15) miles or less upstream from a Public Water System intake. TEP overlaid the available GUDI well and Type III Well data from the COGCC to determine if the proposed operations would be within 2,640 feet of these wells. Additionally, TEP identified the Public Water System intake locations downstream of the proposed Federal 299-23-3 pad and determined that all proposed operations would not fall within 15 stream miles of an active Public Water System intake.

Based on TEP evaluation, a site-specific Emergency Spill Response Plan is not necessary for planned operations at the Federal 299-23-3 pad. However, TEP has implemented and maintains a Spill Prevention, Control and Countermeasure Plan (SPCC), which is a basin wide emergency spill response plan as required by Title 40, Code of Federal Regulations, Part 112 (40 CFR 112) as administered by the U.S. Environmental

Protection Agency. This plan describes measures implemented by TEP to prevent discharges from occurring and response measures to mitigate the impacts of a potential discharge.

Noise Mitigation Plan (Rule 304.c.(2))

TEP is requesting an exemption to the Noise Mitigation Plan required under Rule 304.c.(2) pursuant to Rule 304.d Lesser Impact Areas. Please see the attached Lesser Impact Area Exemption Request Letter for more details.

Light Mitigation Plan (Rule 304.c.(3))

TEP is requesting an exemption to the Light Mitigation Plan required under Rule 304.c.(3) pursuant to Rule 304.d Lesser Impact Areas. Please see the attached Lesser Impact Area Exemption Request Letter for more details.

Odor Mitigation Plan (Rule 304.c.(4))

The Federal 299-23-3 pad is located in a remote area of Rio Blanco County, Colorado, which is made up of large tracts of public and private land general used for resource development, ranching, recreation, and hunting. The working pad surface of the proposed oil and gas location is not within 2,000 feet of a Building Unit or Designated Outside Activity Area. Therefore, the Oder Mitigation Plan is not required per Rule 426.a.

Dust Mitigation Plan (Rule 304.c.(5))

TEP is committed to minimizing fugitive dust during all phase of development and has prepared a Dust Mitigation Plan as required per Rule 304.c.(5) which address the measures that will be taken to minimize fugitive dust. The Dust Mitigation Plan has been attached to the Form 2A for review by the Director and the Commission.

Transportation Plan (Rule 304.c.(6))

As mention above, the Federal 299-23-3 pad is located in the NW¼SW¼ of Section 23, Township 2 North, Range 99 West, 6th P.M. within Rio Blanco County, Colorado. Rio Blanco County is the Relevant Local Government with jurisdiction over siting of oil and gas locations. Per Rio Blanco County Land Use Regulation, a Well Pad Special Use / Building Permit application is required to be submitted for approval by the county. During review of the application requirements a Transportation Plan or Traffic Study is not required as part of the application for this location. Therefore, TEP has not prepared a Transportation Plan per Rule 304.c.(6).

Operations Safety Management Plan (Rule 304.c.(7))

TEP has prepared an Operations Safety Management Plan as required per Rule 304.c.(7) and has attached it to the Form 2A for review by the Director and the Commission.

Emergency Response Plan (Rule 304.c.(8))

TEP has prepared an Emergency Response Plan as required per Rule 304.c.(8) and per the requirements of Rule 602.j. The Emergency Response Plan has been attached to the Form 2A for review by the Director and the Commission.

Flood Shut-in Plan (Rule 304.c.(9))

TEP reviewed floodplain data made available by Rio Blanco County Colorado and the Federal Emergency Management Administration (FEMA) and has determined that the Federal 299-23-3 pad is not located within a floodplain, and therefore a Flood Shut-in Plan is not required for this permit application.

Hydrogen Sulfide Drilling Plan (Rule 304.c.(10))

A hydrogen sulfide drilling plan (H₂S) has not been prepared and is not required for the Federal 299-23-3 pad, as TEP does not expect to encounter H₂S during drilling of the proposed injection on this oil and gas location.

Waste Management Plan (Rule 304.c.(11))

TEP has prepared a Waste Management Plan as required per Rule 304.c.(11) and has attached it to the Form 2A for review by the Director and the Commission.

Gas Capture Plan (Rule 304.c.(12))

A Gas Capture Plan is not required for this location per Rule 903.e.(1).A, as TEP will not be developing any new natural gas wells from this location. Additionally, there are no active production wells on this location. Only one (1) injection well is being proposed for construction from this location at this time.

Fluid Leak Detection Plan (Rule 304.c.(13))

TEP has prepared a Fluid Leak Detection Plan as required per Rule 304.c.(13) and has attached it to the Form 2A for review by the Director and the Commission.

Topsoil Protection Plan (Rule 304.c.(14))

TEP has prepared a Topsoil Protection Plan as required per Rule 304.c.(14) and has attached it to the Form 2A for review by the Director and the Commission.

Stormwater Management Plan (Rule 304.c.(15))

TEP has prepared a Stormwater Management Plan as required per Rule 304.c.(15), include stormwater control exhibits depicting preliminary control measures. This plan has been attached to the Form 2A for review by the Director and the Commission.

Interim Reclamation Plan (Rule 304.c.(16))

TEP has prepared an Interim Reclamation Plan as required per Rule 304.c.(16) and has attached it to the Form 2A for review by the Director and the Commission.

Wildlife Plan (Rule 304.c.(17))

TEP has prepared a Wildlife Protection Plan as required per Rule 304.c.(17) and has attached it to the Form 2A for review by the Director and the Commission.

Water Plan (Rule 304.c.(18))

TEP has prepared a Water Plan as required per Rule 304.c.(18) and has attached it to the Form 2A for review by the Director and the Commission.

Cumulative Impacts Plan (Rule 304.c.(19))

WestWater Engineering has reviewed the proposed development plan, and the Environmental Analysis prepared by BLM for the Federal 299-23-3 pad and has prepared a Cumulative Impacts Plan as required per Rule 304.c.(19). The Cumulative Impacts Plan has been attached to the Form 2A for review by the Director and the Commission.

Community Outreach Plan (Rule 304.c.(20))

The Federal 299-23-3 pad is located in a remote area of Rio Blanco County, Colorado, which is made up of large tracts of public and private land general used for resource development, ranching, recreation, and hunting. The working pad surface of the proposed oil and gas location is not within 2,000 feet of a Residential Building Unit, High Occupancy Building Unit, or School Facility located within a Disproportionately Impacted Community. Therefore, the Community Outreach Plan is not required per Rule 426.a.

Geologic Hazard Plan (Rule 304.c.(11))

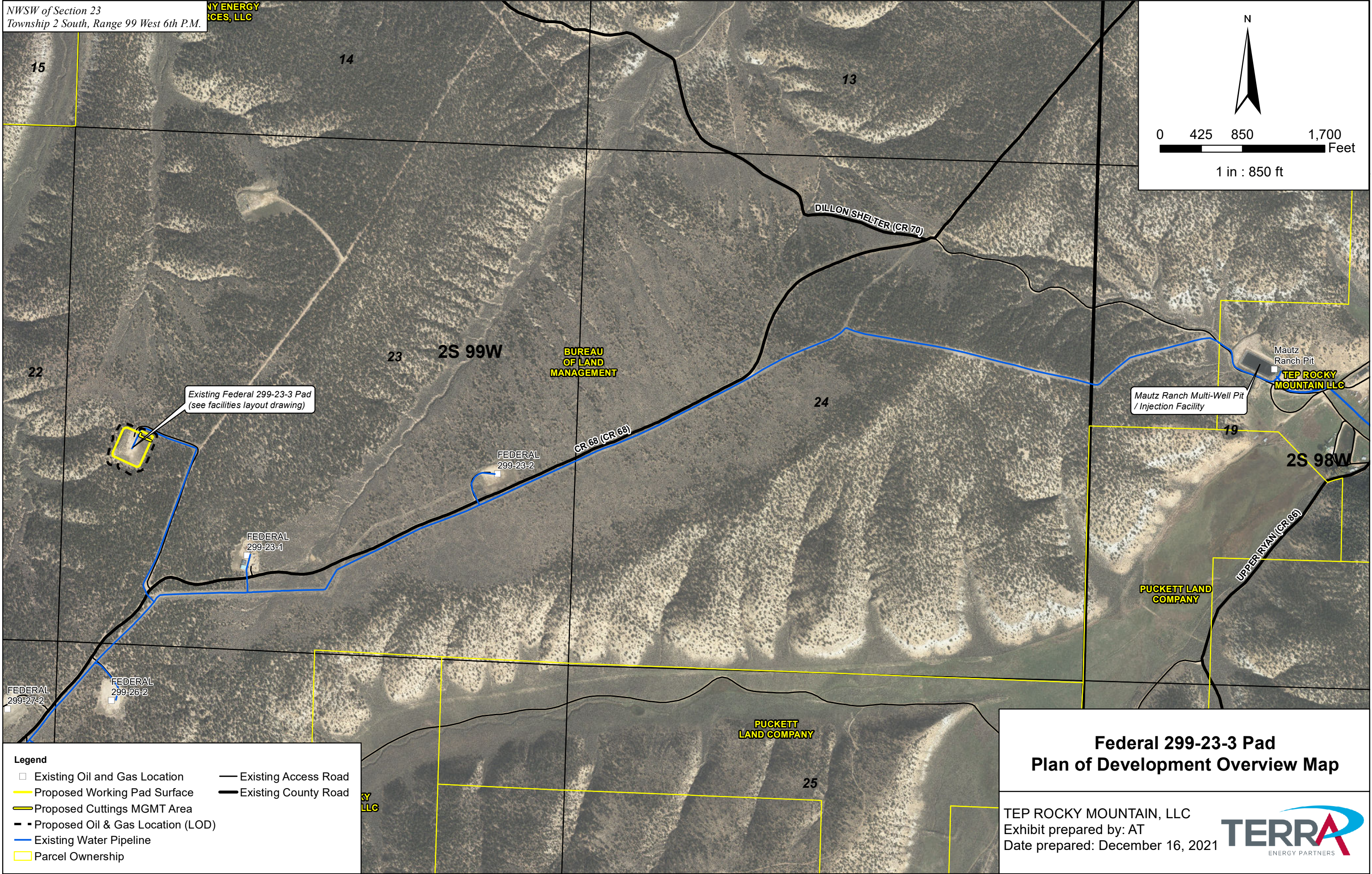
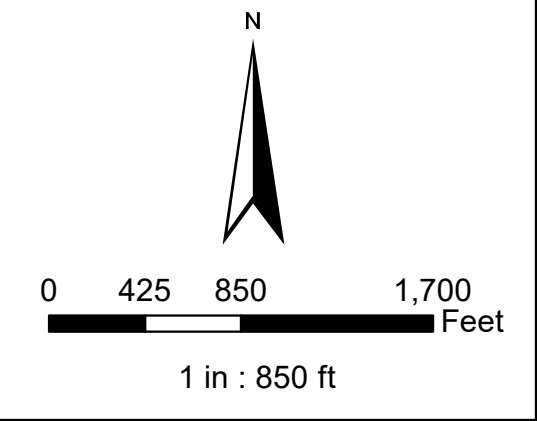
TEP has reviewed the proposed development plan for the Federal 299-23-3 pad and has determined that there are no Geologic Hazards with one mile of the proposed Oil and Gas Location. Please see the Geologic Hazard Map attached to the Form 2A, which include a geologic hazard report prepared by Fox Engineering Solutions, Inc, and a review and certification from a Professional Geologist.

Lesser Impact Area (Rule 304.d.)

TEP is requesting a Lesser Impact Area Exemption Request for the Noise Mitigation Plan and Lighting Mitigation Plan required per Rule 304.b. and has attached a Lesser Impact Area Exemption Request to the Form 2A describing the basis for the exemption request.

COGCC INJECTION WELL PERMITTING

TEP is submitting a Form 31-Intent and Form 33-Intent as part of the Oil and Gas Development Plan, including all attachments and requirements under the 800 Rules, as applicable. The Federal RG 912-23-299D is proposed to inject into the Williams Fork Formation, which is also a hydrocarbon producing formation that also produces water that contains groundwater with total dissolved solids (“TDS”) concentration greater than 10,000 milligrams per liter (“mg/l”). Water samples from the nearby Federal RGU 299-23-1 injection well (API 103-10488) calculated TDS of 18,908 mg/l. All noticing requirements under Rule 803 have been met and attached to the Form 31-Intent.



Legend

Existing Oil and Gas Location	Existing Access Road
Proposed Working Pad Surface	Existing County Road
Proposed Cuttings MGMT Area	
Proposed Oil & Gas Location (LOD)	
Existing Water Pipeline	
Parcel Ownership	

Federal 299-23-3 Pad
Plan of Development Overview Map

TEP ROCKY MOUNTAIN, LLC
Exhibit prepared by: AT
Date prepared: December 16, 2021