



BAYSWATER
EXPLORATION & PRODUCTION, LLC

RULE 304.E. SUBSTANTIALLY EQUIVALENT INFORMATION COVER SHEET

Ruby 7-J Pad Oil and Gas Development Plan, Docket #210700120

Ruby 7-J Pad: NESW, Section 7, Township 7 North, Range 65 West

Form 2A Doc #402590095

Weld County, Colorado

The attached 1041 WOGLA Application is being submitted as a substantially equivalent document to the Emergency Response Plan required by COGCC Rule 424.a.

This document was developed for the Weld County 1041 WOGLA.

This document does not conform to COGCC rules or guidance in the following ways:

There are no Public Water System administrators applicable to be listed as a contact in Section 4.

This document should be accepted as substantially equivalent:

The Emergency Response Plan (submitted as pages 63-78 of the 1041 WOGLA Application) was approved by both Ault Pierce Fire Protection District and Weld County OEM on 12/9/2020. In 2016, Ault Pierce became a combination volunteer/professional department, with staffed stations 24/7.

Weld County Oil and Gas Location Assessment 1041 WOGLA Permit Application

Emergency Action Plan (EAP) & *Tactical Response Plan (TRP)*

SITE SAFETY AND EMERGENCY ACTION PLAN

Bayswater Exploration and Production, LLC



**BAYSWATER
EXPLORATION AND PRODUCTION, LLC**

District Office

Bayswater Exploration and Production, LLC

730 17th Street

Suite 500

Denver, Colorado 80202

Ruby 7-J Pad

NESW Section 7, Township 7 North, Range 65 West

Address: TBD

WELD COUNTY, COLORADO

Proposed Spud Date: 2nd Quarter 2021

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SECTION 1
SITE SPECIFIC INFORMATION

Bayswater Exploration and Production, LLC			
Name	Signature	Title	Date
Mark E. Brown	Mark E. Brown <small>Digitally signed by Mark E. Brown Date: 2020.08.24 13:36:17 -06'00'</small>	Operations Manager	8/24/2020
Fire District			
Name	Signature	Title	Date
Adam Ferrell	<i>Adam Ferrell</i>	Captain	12/09/2020

Weld County Office of Emergency Management
Digitally Signed

<div style="display: inline-block; vertical-align: middle;"> <p style="font-size: 2em; margin: 0;">David Burns</p> </div> <div style="display: inline-block; vertical-align: middle; margin-left: 10px;"> <p>Digitally signed by David Burns Date: 2020.12.09 11:46:23 -07'00'</p> </div>

SECTION 2

SITE SPECIFIC INFORMATION

a) Site Safety Requirements and General Information

The minimum personal protective equipment (PPE) to enter any Bayswater Exploration and Production, LLC production location includes hard hat, safety glasses, safety toe boots, fire resistant clothing (FRC), and a 4-gas monitor. All contractors and visitors are responsible for providing their employees with the appropriate training on and use of PPE while on Bayswater Exploration and Production, LLC locations. In addition, all contract personnel entering an Bayswater Exploration and Production, LLC location to perform work must understand and abide by Bayswater Exploration and Production, LLC's contractor expectations relating to environmental, health, and safety requirements.

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

b) Emergency Muster/Assembly point(s)

Ruby 7-J Pad: NESW Section 6, Township 7 North, Range 65 West

c) 911 Address and GPS coordinates

API# – Pending COGCC Permit Approval

Legal Description – NESW Section 7, Township 7 North, Range 65 West

Address - * Address Pending

Directions: From the intersection of Hwy 14 and CR 37, head Easton Hwy 14 for 2350 to a proposed access to the North. Thence North for 2640 feet to the proposed pad and facility.

Town, CO Zip – Weld, Colorado

Lat/Long: Lat: 40.589694 Long: -104.707111

d) Site description

The Ruby 7-J Pad: NESW Section 7, Township 7 North, Range 65 West is an Bayswater Exploration and Production, LLC oil and gas production facility that will have thirty-eight (38) horizontal oil and gas wells along with ten (10) 500 barrel crude oil storage tanks and four (4) 500 barrel produced water tanks located inside a lined secondary containment structure.

e) **Nearby schools and other High Occupancy Buildings**

None within 2500' of location.

f) **Directions to Project Locations**

Ruby 7-J Pad: NESW Section 7, Township 7 North, Range 65 From the intersection of Hwy 14 and CR 37, head East on Hwy 14 for 2350 feet to a proposed access to the North. Thence North for 2640 feet to the proposed pad and facility.

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

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

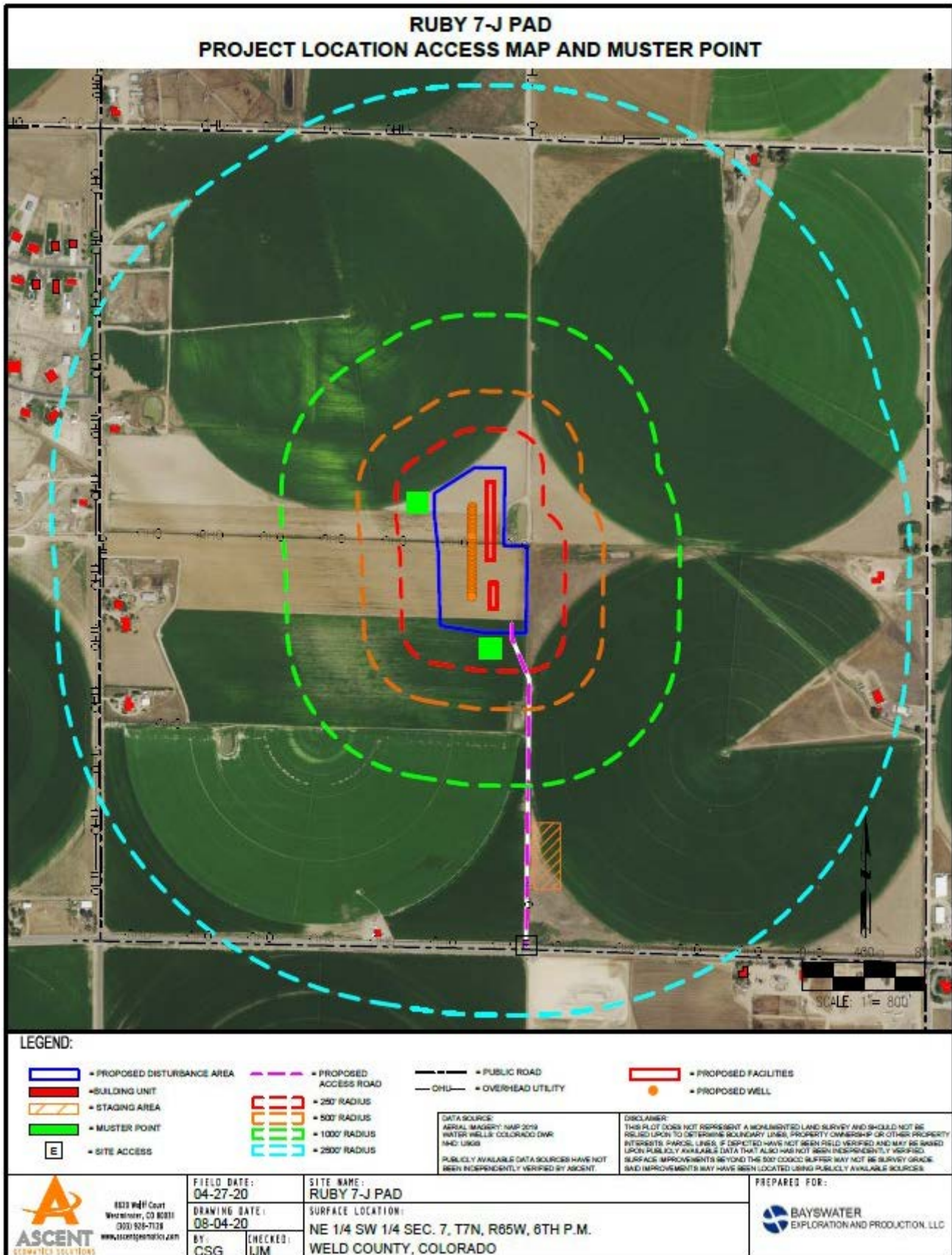
During drilling and completion activities all employees and approved visitors to the Ruby 7-J Pad will be required to enter through the location entrance and will be required to sign in with the wellsite supervisor on location at that time and will be provided with a detailed safety briefing of current operations and all safety precautions that must be adhered to while on location. In addition, all who enter the location must also sign out upon their departure. Wellsite personnel are required to account for all persons entering or leaving location during active operations and in the event of an incident.

Once drilling and completion activities are finalized, the site will transition to its production phase and no unauthorized personnel will be allowed on location without first contacting a company representative. At this point, the primary chemicals stored on site will be crude oil and produced water.

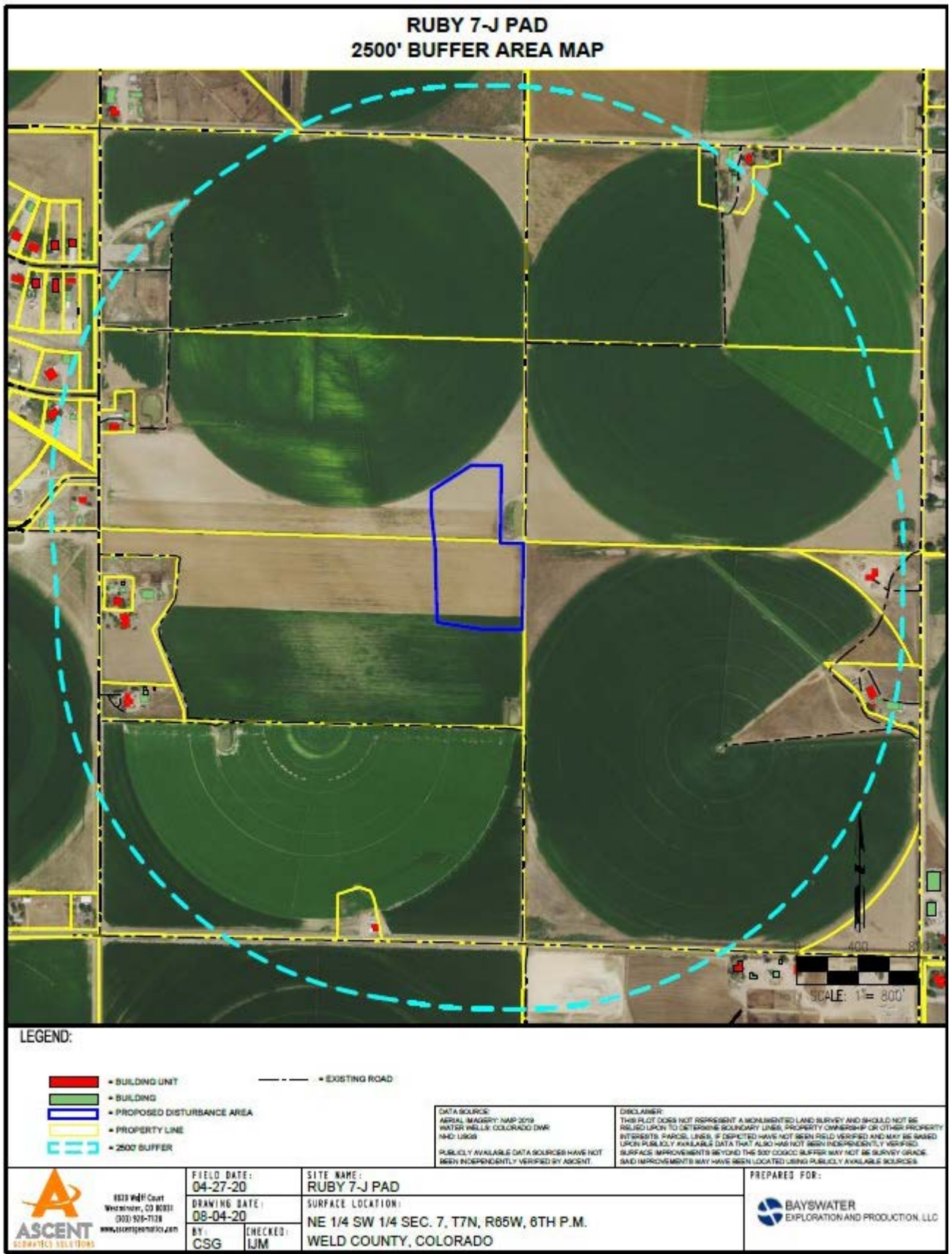
Section 3
Project Area Map
 250', 500', 1,000' Buffer



Project Location Access Map and Muster Point



2500 Foot Buffer Area Map



Section 4
List of Emergency Contacts

a) Energy Company

Name	Office Phone	Emergency/Cell
Bayswater Exploration and Production, LLC 730 17 th Street Suite 500 Denver, Colorado 80202	303-893-2503	720-515-2297
Field Office and Address 228 7 th Street Eaton, Colorado 80615	303-893-2503	720-515-2297
Bayswater Exploration and Production, LLC EHS on-call emergency number	n/a	720-515-2297
EHS Supervisor – Kevin Kane	303-893-2503 x216	303-859-5988
EHS Safety – Kevin Kane	303-893-2503 x216	303-859-5988
EHS – Environmental – Brad Rogers	303-893-2503 x204	303-229-1128

b) Energy Company community/media relations

Name	Office	Cell Phone
Steve Struna	303-893-2503	n/a

c) First Responders

Name	Emergency	Office Number
Ault Pierce Fire Protection District Station 1	911	970-834-2848
Ault Police Department	911	970-834-1336
Weld County Sheriff	911	970-356-4015
Colorado State Highway Patrol	911	970-506-4999

d) Regulator Contacts

Name	Office Phone	Cell Phone
COGCC	303-894-2100	none
CDPHE	877-518-5608	none
Colorado Parks & Wildlife	303-291-7227	none
National Response Center	800-424-8802	none

e) Medical Facilities

Name	Office Phone	Cell Phone
Northern Colorado Medical Center	970-352-4121	none
Medical Center of the Rockies	970-624-2500	none

f) Spill Response Organization

Name	Office Phone	Cell Phone
Clean Harbors Environmental Services Inc.	303-289-8031	281-784-4700 (24-Hr.)
LT Environmental	303-433-9788	303-549-3262 (24-Hr.)
Resilient RM	281-535-2834	860-916-8133 (24-Hr.)

g) Fire, explosion, associated with loss of well control

Name	Office Phone
Ault Pierce Fire Protection District Station 1	970-834-2848
Center for Toxicology and Environmental Health, LLC (CTEH)	866-869-2834
Wild Well Control, Inc	817-247-8175 (Main) 281-784-4700 (24-Hr.)
Northern Colorado Medical Facility (Burn Unit)	970-810-4121
Weld County Office of Emergency Management (Roy Rudisill)	970-304-6540

h) Government Agencies

Name	Office Phone
Ault Police Department	911 or 970-834-1336
Weld County Sheriff's Office	911 or 970-356-4015
COGCC	303-894-2100
CDPHE	877-518-5608
Weld County (Amanda Petzold, OGED)	970-400-3585

i) Railroad Emergency Response

Name	Office Phone
Union Pacific Railroad	888-877-7267

Section 5

Spill Response and Clean Up

a) Spill Response

There are multiple types of hydrocarbons which can be released/spilled during oil and gas production and exploration. Most commonly released are unrefined products such as crude oil and produced water. Refined petroleum products such as diesel, gasoline, and motor oil spills are less common, but still equally important to mitigate. If a spill is found reportable, it will be mitigated in accordance with Colorado Oil and Gas Conservation Commission (COGCC) and Colorado Department of Public Health and Environment (CDPHE) guidelines.

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

In the event of a large incident requiring outside assistance, Bayswater Exploration and Production, LLC has contracted with Spill response contractor. Spill response contractor possesses a working knowledge of oil and gas operations, emergency response and Incident Command. Once notified Spill response contractor personal can be on location within 12 hours.

b) Spill Reporting

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

- A spill/release will be reported to the COGCC if released material is property of Bayswater and meets the COGCC reporting thresholds (see below), an example would be crude oil released from a separator or produced water from a water tank.
- A spill/release will be reported to the Weld County LEPC if released material is property of Bayswater and meets the COGCC reporting thresholds (see below),
- A spill/release will be reported to the CDPHE if released material is in the custody of a third party for spills that meet CDPHE reporting thresholds, are of any size that impact or threaten to impact waters of the state, a residence or occupied structure, livestock or public byway. An example would be an oil hauler over filling a truck and spills product onto the ground next to a flowing irrigation ditch.

There are three release volume thresholds which determine if a hydrocarbon spill is reportable. These are:

1. If crude oil or produced water is released **INSIDE** secondary containment and volume is greater than **5 barrels**.
2. If crude oil or produced water is **OUTSIDE** secondary containment and volume is greater than
3. **1 barrel**.
4. If more than **25 gallons** of petroleum product such as diesel, gasoline or motor oil is spilled
5. **OUTSIDE** of secondary containment.

Once a spill is determined reportable, there is a 24-hour deadline to make initial notification to the COGCC or CDPHE depending on product ownership. Spills/releases in the custody of Bayswater will be reported by a Company representative. Spills/releases in the custody of a third party will be reported by the responsible company's EHS Department to the appropriate agency and to Bayswater.

These regulatory guidelines will be strictly followed by Bayswater and any contractors operating under Bayswater guidance during all activities at the Ruby 7-J Pad.

Section 6

Reportable quantities

a) Reportable quantities

Mandated by Section 312 of the Emergency Planning and Community Right-To-Know Act (EPCRA) – also known as SARA Title III – the Tier II form captures information about the types, quantities, and locations of hazardous chemicals at a given facility. The form also lists contact information for the facility’s designated emergency point-of-contact.

Any facility that is required to maintain MSDSs (or SDSs) under the Occupational Safety and Health Administration (OSHA) regulations for hazardous chemicals stored or used in the work place.

Facilities with chemicals in quantities that equal or exceed the lists of lists thresholds must report.

- Propane, benzene, propene and methane are on the lists of lists and are known to be in crude oil. In addition, diesel is on the lists of lists and may be stored on sites during construction.

b. Reportable requirements

If your facility will meet the requirements under 40 CFR, you must submit your Tier II report to the state every year before March 1st.

These regulatory guidelines will be strictly followed by Bayswater and any contractors operating under Bayswater guidance during all activities at the Ruby 7-J Pad.

Section 7

Evacuation Information

a. Evacuation Plan Procedures (public)

The procedure to be used in alerting nearby persons in the event of any occurrence that could pose a threat to life or property will be arranged and completed with public officials in detail.

In the event of an actual emergency, the following steps will be immediately taken:

1. The Bayswater representative will immediately notify proper authorities, including the sheriff's office, highway patrol, and any other public officials as described above and will enlist their assistance in warning residents and transients in the calculated radius of exposure.
2. Bayswater will coordinate with local authorities to warn residents' down-wind of the location and within radius of exposure from the well site. Additional evacuation zones may be necessary as the situation warrants.
3. The Bayswater representative will coordinate with appropriate emergency personnel to divert traffic in the vicinity away from the potentially dangerous area. No trespassing and warning signs will be posted at the entrance to the well site. The contract company will monitor essential and non-essential traffic on-site.
4. General:
 - a. The area included within the radius of exposure is considered to be the zone with the maximum potential hazard. When it is determined that conditions exist which create an additional area (beyond the initial zone of maximum potential hazard) vulnerable to possible hazard, public areas in the additional hazardous area will be evacuated.
 - b. In the event of a disaster, after the public areas have been evacuated and traffic stopped, it is expected that local civil authorities will have arrived and within a few hours will have assumed direction of and control of the public, including all public areas. Bayswater will cooperate with these authorities to the fullest extent and will exert every effort by careful advice to such authorities to prevent panic or rumors.
 - c. Bayswater will dispatch appropriate personnel to the disaster site as soon as possible. The company's personnel will cooperate with and provide such information to civil authorities as they might require.

Section 8
Coordination with First Responder Agencies

- a) Bayswater will communicate drill spud, completion operations and Production Turn-In-Line dates to the Weld County Office of Emergency Management for coordination/communication with local first responders. These start dates will be provided a minimum of 7 business days prior to commencement or change in oil and gas development operations.
- b) In the event of an emergency requiring First Responders, Unified Command will be established between the Bayswater appointed company man on location and First Responders present. Unified Command post will be established based on conditions present at time of incident.
- c) Bayswater is an active member of Front Range Emergency Resource Corporative (FRERC) and a solution is being sought thorough a cooperative effort including other operators, First Responders and Weld County. The Ault Fire Department District, which is the closest first responding unit to this site has immediate access to foam resources.
- d) Bayswater's EHS representative and first responders identified in this Site Safety and Emergency Action Plan have reviewed this plan and discussed coordination efforts in the event of an emergency situation requiring first responder assistance.