

St. Croix Operating, Inc.
Horseshoe #1
NENE Section 27, T3S R50W
Washington County, Colorado

DUST MITIGATION PLAN

St. Croix Operating, Inc. (St. Croix) has drafted this plan in accordance with Rule 304.c.(5) and Rule 427.

SITE DESCRIPTION:

The soils the road and location will be constructed on are primarily sandy soils.

The project proposes a new location for one well, the Horseshoe #1. This location will require a new access road. All production facilities will be located on the proposed Horseshoe Production Facility location to the northeast. An off-location flowline will be constructed with the access road to connect the wellhead to the production equipment at the Horseshoe Production Facility.

The proposed access road to the proposed Horseshoe #1 location is 2,314 feet from the county road. The proposed disturbance corridor for the access road is approximately 1.06 acres.

The proposed Horseshoe #1 location is proposed to be 5.83 acres of disturbance.

No utility corridors are being proposed for this location.

An off-location flowline (OLF) will be constructed to connect the Horseshoe #1 location to the proposed Horseshoe Production Facility location. The OLF is proposed to be 1,658 feet in length, and the construction disturbance will be 30 feet wide, for a total of 1.14 acres of disturbance to be fully reclaimed when construction is completed.

SOIL TYPES WITHIN PROJECT AREA:

Map Unit	Soil Series	Additional Information	Project Components
70	Valent sand, 3-9 Percent slopes	Dunes, hills; Noncalcareous eolian sands	Proposed Horseshoe #1 Location, Access Road, and Off-Location Flowline

INGRESS/EGRESS TO THE OIL AND GAS LOCATION:

The proposed access road will be an unpaved road. There will be no turn lanes. Tracking pads are not being proposed for use on this location.

Speed restrictions on lease roads will be utilized to minimize dust. An average of 25 mph is currently anticipated to be used for most vehicles.

Design and surface roads based on the traffic, speed, and type of vehicles to reduce, dust, mud, and environmental damage.

CONSTRUCTION:

- During the construction of the access road and well pad, dust mitigation may occur at least weekly, dependent upon need.
- Construction activities may be limited or deferred on high-wind days to restrict potential fugitive dust, specifically activities that involve moving dirt will be deferred on high wind days to prevent fugitive dust and soil loss.
- Anticipated truck trips, including water trucks for dust mitigation, during this phase is approximately 54 round trips.

DRILLING:

- During drilling operations, dust mitigation may occur at least weekly, dependent upon need.
- Anticipated truck trips, including water trucks for dust mitigation, during this phase is approximately 272 round trips.

COMPLETIONS:

- During completion operations, dust mitigation may occur at least weekly, dependent upon need.
- Anticipated truck trips, including water trucks for dust mitigation, during this phase is approximately 105 round trips.
- Completion operations will not use sand or other products that could potentially exacerbate dust in the area.

PRODUCTION:

- During the production phase of the well pad, traffic is significantly reduced from previous stages of activity. Therefore dust mitigation will also lessen significantly. Dust mitigation will occur on an as-needed basis only.
- Anticipated truck trips during the initial year of the production phase are one light-duty truck per day.

BEST MANAGEMENT PRACTICES:

- St. Croix will utilize freshwater for dust suppression practices.
- Speed restrictions on the access roads will be utilized to minimize dust. An average of 25 mph is currently anticipated to be used for most vehicles.
- Construction activities may be limited or deferred on high-wind days to restrict potential fugitive dust, specifically activities that involve moving dirt will be deferred on high wind days to prevent fugitive dust and soil loss.
- Topsoil and stockpiled soils will be stabilized through either wheel packing, tackifiers, seeding practices, or erosion control blankets.

Truck Trips Per Operational Activity

Phase	Number of Days	Light Vehicle Roundtrips Per Day	Heavy Vehicle Roundtrips Per Day	Total Vehicle Roundtrips	Total Vehicle Trips
Construction	7	8	8	54	108
Drilling	11	28	20	272	544
Completion	8	12	22	105	210
Flowback	30	2	4	64	128