

St. Croix Operating, Inc.  
Horseshoe  
Sections 22 and 27, T3S R49W  
Washington County, Colorado

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EMERGENCY RESPONSE PLAN

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St. Croix Operating, Inc. (St. Croix) proposes to operate three new locations in Washington County, Colorado. These locations are included in the Horseshoe Oil and Gas Development Plan. Two of the locations will be producing well locations with a third shared production facilities location. The two producing locations will connect to the production facilities location via off-location flowlines.

This plan has been drafted to comply with COGCC Rules 304.c.(8) and Rule 602.j.

**1. Local Responder Coordinating Agency and Contact Information**

This location is located in Washington County, Colorado, in the Cope Rural Fire Protection District.

The plan was reviewed and received concurrence from Washington County on August 23, 2021. Please see the attached email correspondence.

Washington County Emergency Manager  
100% Full-time

Contact: Bryant McCall  
(970) 630-8662  
150 Ash Avenue  
Akron, CO 80720

Cope Rural Fire Protection District  
100% Volunteer

Contact: (970) 357-4300  
6884 Monroe Ave.  
Cope, CO 80812

Yuma District Hospital  
100% Full-time

Contact: (970) 848-5405  
1000 W. 8<sup>th</sup> Ave.  
Yuma, CO 80759

## 2. Operator Emergency Contact Number

Contact: Paul Melnychenko  
St. Croix Operating, Inc.  
P.O. Box 13799  
Denver, CO 80201  
(303) 489-9298

## 3. Local Responder Mutual Aid Agencies

Southwest Washington County Fire District	100% Volunteer
Otis Fire Department	100% Volunteer
Joes Fire Department	100% Volunteer

## 4. Potential Impacts to the Environment and Nearby Population

This location is located approximately 1.5 miles from the nearest building. It is located adjacent to a public road. In the event of an emergency, there should be minimal impacts to nearby populations. There are no immediate potential environmental impacts to waterways or water bodies.

## 5. Health and Safety Action Levels

### a. Decontamination

- i. St. Croix will have eyewash stations and freshwater available onsite if there are chemicals in use on location that could be hazardous on skin contact.

### b. Staging Areas

- i. Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road YY.

## 6. Site Specific Information

Location Information	
Location Name	Horseshoe #1
COGCC Location ID	Pending
Location Legal Description	NENE Section 27, T3S R49W
Location Latitude and Longitude	39.76870 -102.84307
Directions to location from Cope, Colorado	Head northwest on US-36 W toward Co Rd 7. Turn right onto County Road 7. After approximately 0.6 miles, County Road 7 turns slightly left and becomes

	County Road YY. Head north on County Road YY for 7 miles. The proposed access to the Horseshoe project area will be on the west side of the road.
Description of Site Setting	The site is located in irrigated cropland, near non-irrigated rangeland. There are no immediate potential impacts to waterways or water bodies.
Description of Location Equipment, Fluids, and Potential Hazards	<p>This location will contain a wellhead and an off-location flowline that heads north and northeast from the wellhead.</p> <p>Potential hazards would be a leak from the flowline.</p>
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The off-location flowline undergoes Audio-Visual-Olfactory inspections monthly and annual pressure testing to insure integrity of the line.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the proposed Horseshoe Production Facility, at the intersection of the access road and County Road YY.

Location Information	
Location Name	Horseshoe #2
COGCC Location ID	Pending
Location Legal Description	SWSE Section 22 T3S R49W
Location Latitude and Longitude	39.774169 -102.844095
Directions to location from Cope, Colorado	<p>Head northwest on US-36 W toward Co Rd 7.</p> <p>Turn right onto County Road 7.</p> <p>After approximately 0.6 miles, County Road 7 turns slightly left and becomes County Road YY. Head north on County</p>

	Road YY for 7 miles. The proposed access to the Horseshoe project area will be on the west side of the road.
Description of Site Setting	The site is located in irrigated cropland, near non-irrigated rangeland. There are no immediate potential impacts to waterways or water bodies.
Description of Location Equipment, Fluids, and Potential Hazards	<p>This location will contain a wellhead and an off-location flowline that heads north and northeast from the wellhead.</p> <p>Potential hazards would be a leak from the flowline.</p>
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The off-location flowline undergoes Audio-Visual-Olfactory inspections monthly and annual pressure testing to ensure integrity of the line.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the proposed Horseshoe Production Facility, at the intersection of the access road and County Road YY.

Location Information	
Location Name	Horseshoe Production Facility
COGCC Location ID	Pending
Location Legal Description	SESE Section 22 T3S R49W
Location Latitude and Longitude	39.772780 -102.839938
Directions to location from Cope, Colorado	Head northwest on US-36 W toward Co Rd 7. Turn right onto County Road 7. After approximately 0.6 miles, County Road 7 turns slightly left and becomes County Road YY. Head north on County Road YY for 7 miles. The proposed access to the Horseshoe project area will be on the west side of the road.
Description of Site Setting	The site is located in irrigated cropland, near non-irrigated rangeland. There are no immediate potential impacts to waterways or water bodies.
Description of Location Equipment, Fluids, and Potential Hazards	This location will contain a wellhead and an off-location flowline that heads north and northeast from the wellhead.  Potential hazards would be a leak from the flowline.
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The off-location flowline undergoes Audio-Visual-Olfactory inspections monthly and annual pressure testing to ensure integrity of the line.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road YY.

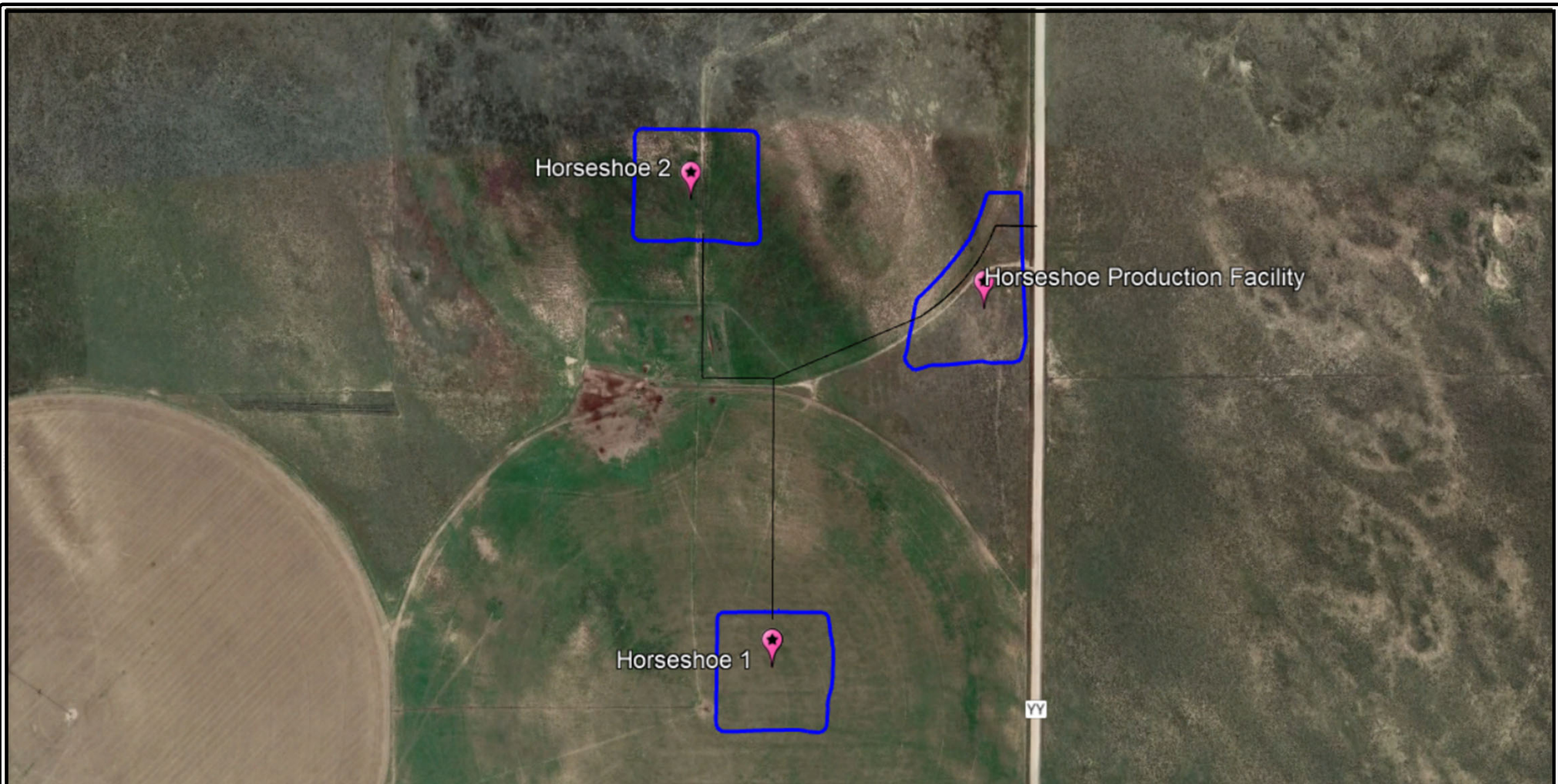
**Attachments:**

Oil and Gas Location Layout Drawings

Emergency Route Maps

Access Road Maps

Washington County Emergency Manager Concurrence with Plan




St. Croix Operating, Inc.  
Horseshoe Project  
Sections 22 and 27, T3S R49W  
Site Locations

Aerial Imagery May Not Reflect Current Surface Conditions

**Legend**

 Proposed Access Road

 Oil and Gas Location



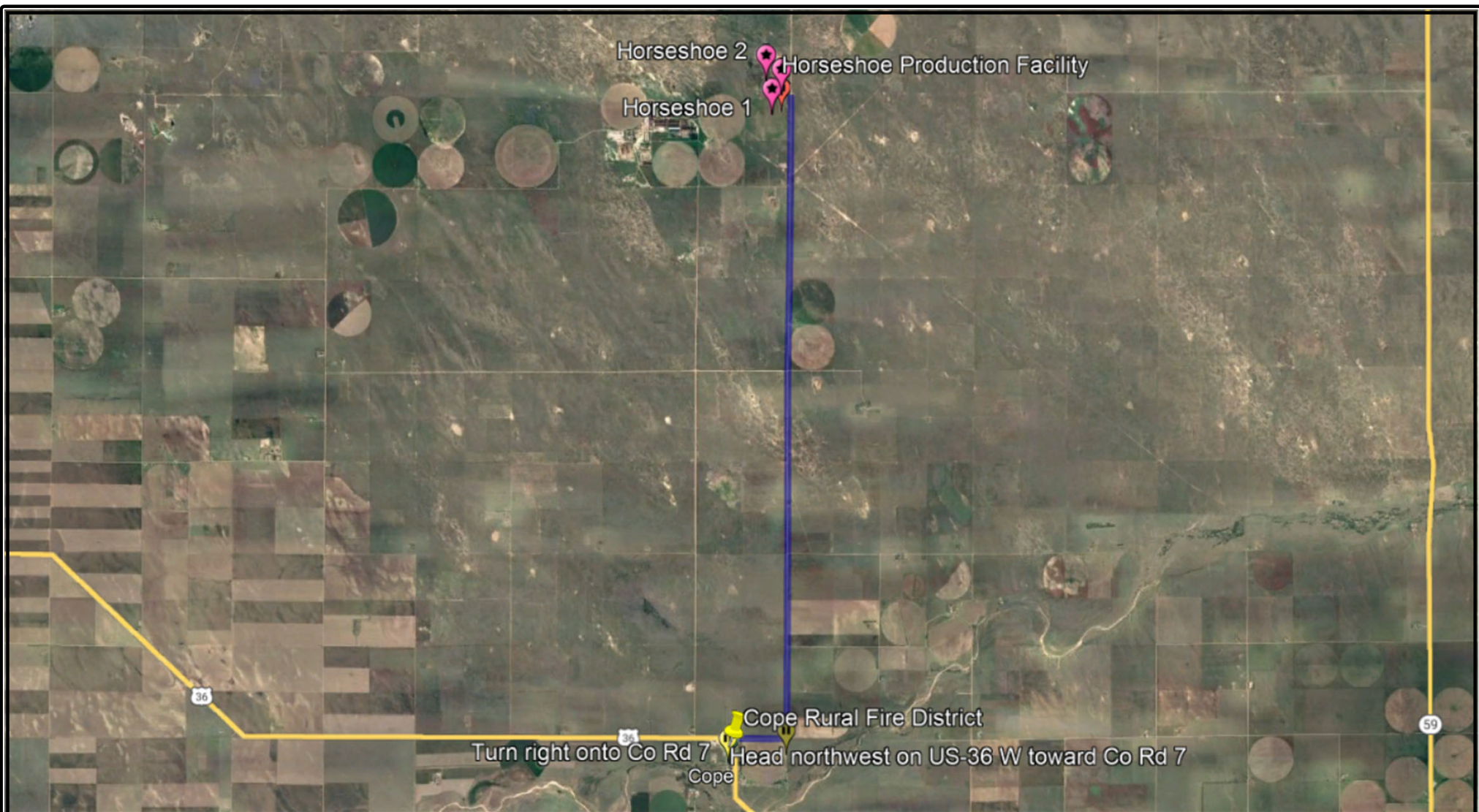
0 ft      500 feet      1,000 feet



Prepared By:  
Ardor Environmental LLC

November 4, 2021





St. Croix Operating, Inc.  
Horseshoe Project  
Sections 22 and 27, T3S R49W  
Emergency Route Map

Legend



Emergency Route

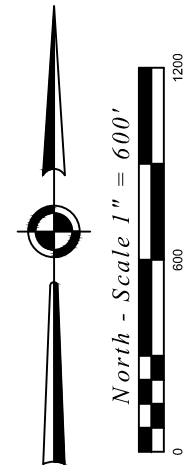
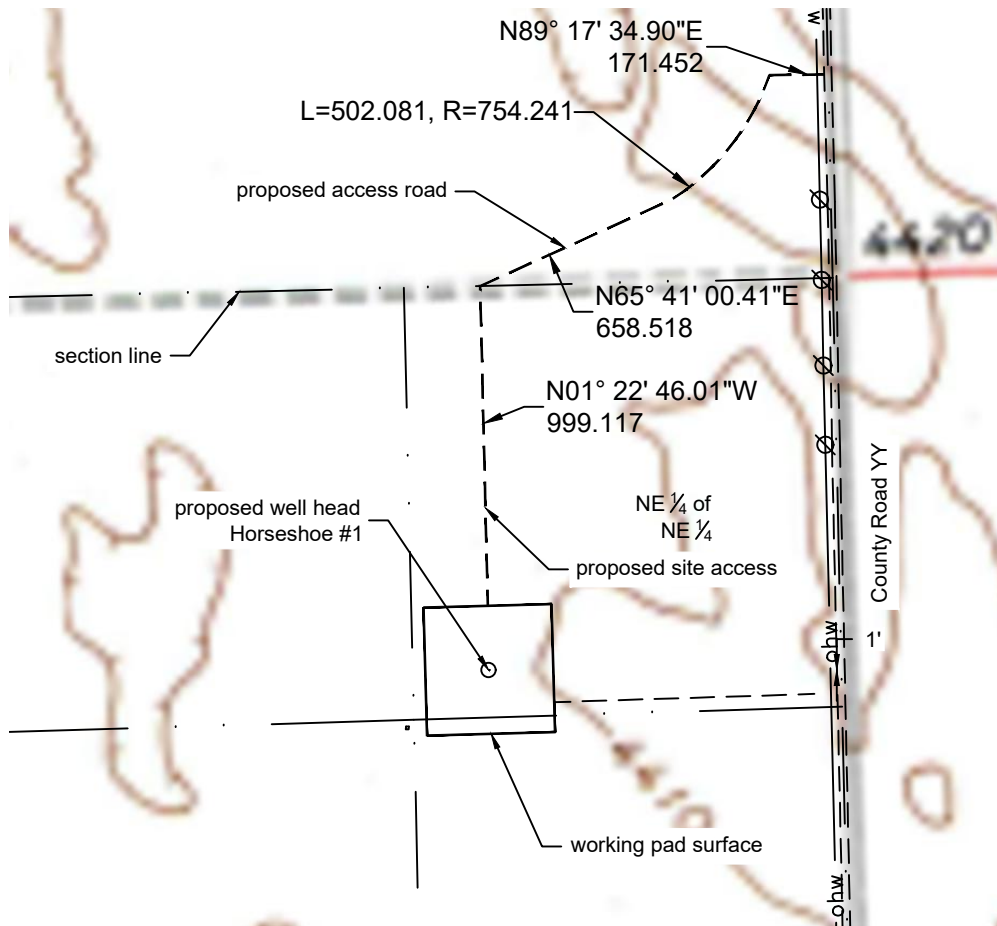


Prepared By:  
Ardor Environmental LLC

August 19, 2021



# Access Road Map



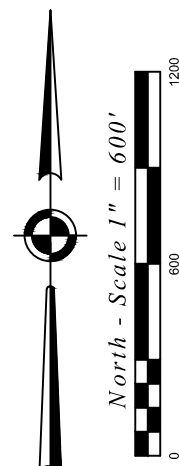
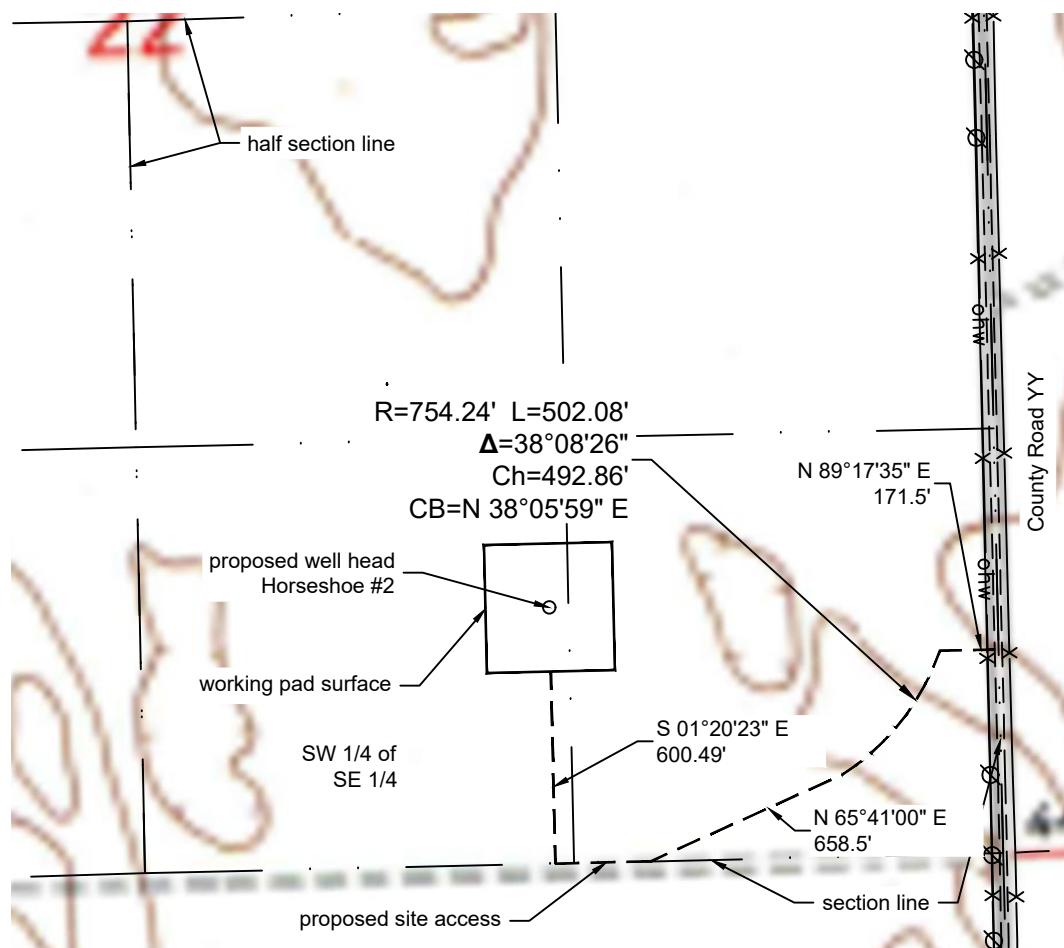
Distance from Proposed Well to nearest :		Direction
Building:	5280'	S
Building Unit:	5280'	S
High Occupancy Building Unit:	5280'	S
Designated Outside Activity Area:	5280'	S
Public Road:	1085'	E
Aboveground Utility:	1064'	E
Railroad:	5280'	S
Property Line:	1100'	E
School Facility:	5280'	SE
School Property Line:	5280'	SE
Child Care Center:	5280'	S

Distance from Proposed drill pad to nearest :		Direction:
Building:	5280'	S
Residential Building Unit:	5280'	S
High Occupancy Building Unit:	5280'	S
Designated Outside Activity Area:	5280'	S
Public Road:	885'	E
Aboveground Utility:	865'	E
Railroad:	5280'	S
Property Line:	899'	E
School Facility:	5280'	SE
Disproportionately Impacted Comm:	5280'	SE
Child Care Center:	5280'	S

C:\Users\bahor\OneDrive\for Brett\21028\dwg\21028\_ACC.dwg October 20, 2021 -- 11:44am

Well Name:		Field Date 07.12.2021	Prepared for:	Project#: 21028.001
Horseshoe #1		Party Chief BAB		
S27-T03S-R49W-6 PM		Survey Tech N/A		
Washington County, CO		Proj. Manager BAB	PLS Corporation 532 West 66th Street Loveland, Colorado 80538 970.669.2100 - info@plscorporation.com	

# Access Road Map



## Distance from Proposed Well to nearest:

Building:	5280'
Building Unit:	5280'
High Occupancy Building Unit:	5280'
Designated Outside Activity Area:	5280'
Public Road:	1388'
Aboveground Utility:	1366'
Railroad:	5280'
Property Line:	1400'
School Facility:	5280'
School Property Line:	5280'
Child Care Center:	5280'
RBU or HOBV within DI Comm:	5280'

## Direction:

S
S
S
S
E
E
S
E
SE
SE
S
S

## Distance from Proposed drill pad to nearest:

Building:	5280'
Residential Building Unit:	5280'
High Occupancy Building Unit:	5280'
Designated Outside Activity Area:	5280'
Public Road:	1188'
Aboveground Utility:	1166'
Railroad:	5280'
Property Line:	1200'
School Facility:	5280'
Disproportionately Impacted Comm:	5280'
Child Care Center:	5280'
RBU or HOBV within DI Comm:	5280'

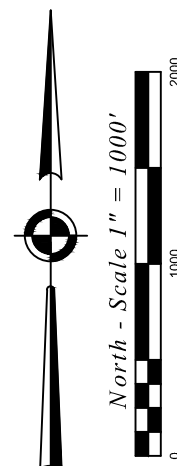
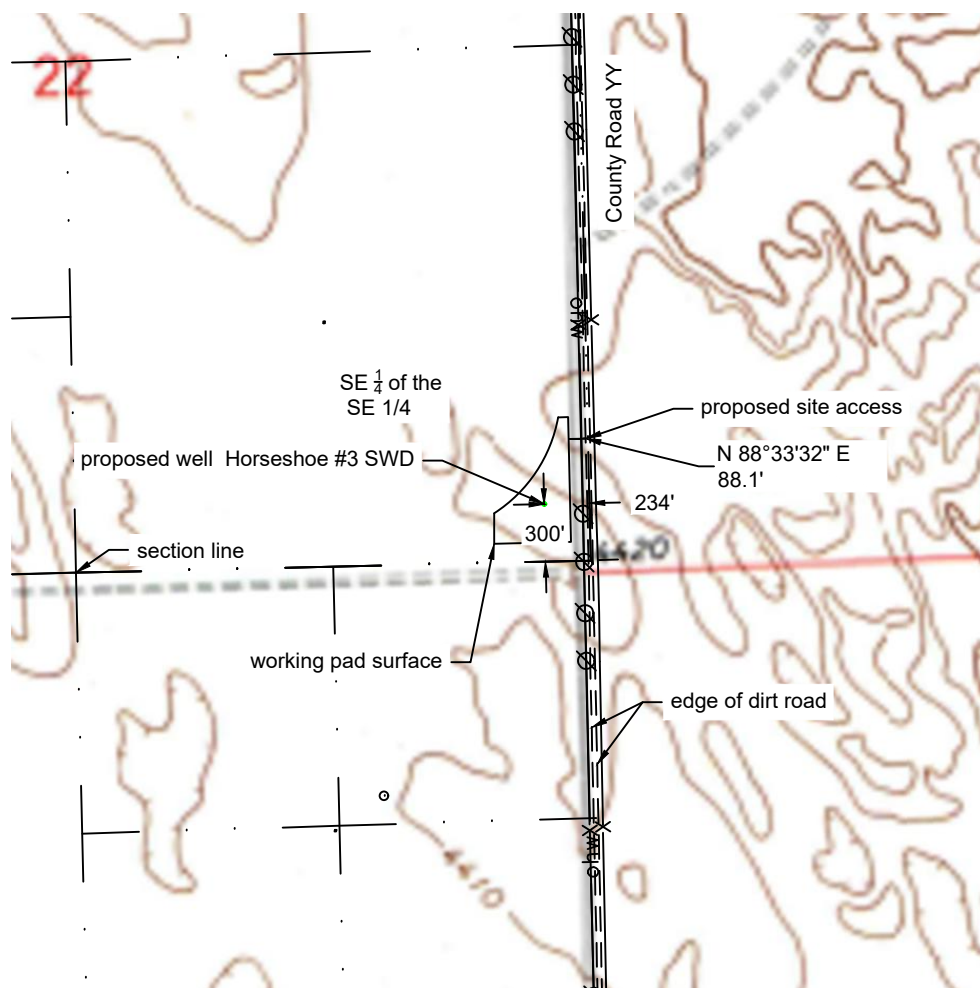
## Direction:

S
S
S
S
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S
E
SE
SE
S
S

C:\Users\plscg\OneDrive\for Brett\21029\dwg\21029\_Acc.dwg October 25, 2021 - 1:36pm

Well Name:	<b>Horseshoe #2</b>	Field Date <b>07.12.2021</b>	Prepared for:	Project#: <b>21029.001</b>
		Party Chief <b>BAB</b>	<b>St Croix Operating, Inc.</b>	
S22-T03S-R49W-6 PM		Survey Tech <b>N/A</b>		
Washington County, CO		Proj. Manager <b>BAB</b>		
PLS Corporation 532 West 66th Street Loveland, Colorado 80538 970.669.2100 - info@plscorporation.com				

# Access Road Map



## Legend:

— ohw —	overhead utility wire
-----	section line
-----	edge dirt road
-----	access road

## Distance from Proposed Well to nearest :

		Direction
Building:	5280'	S
Building Unit:	5280'	S
High Occupancy Building Unit:	5280'	S
Designated Outside Activity Area:	5280'	S
Public Road:	219'	E
Aboveground Utility:	200'	E
Railroad:	5280'	S
Property Line:	234'	E
School Facility:	5280'	SE
School Property Line:	5280'	SE
Child Care Center:	5280'	S

## Distance from Proposed drill pad to nearest :

		Direction:
Building:	5280'	S
Residential Building Unit:	5280'	S
High Occupancy Building Unit:	5280'	S
Designated Outside Activity Area:	5280'	S
Public Road:	85'	E
Aboveground Utility:	66'	E
Railroad:	5280'	S
Property Line:	100'	E
School Facility:	5280'	SE
Disproportionately Impacted Comm:	5280'	SE
Child Care Center:	5280'	S

C:\Users\plscg\OneDrive\for Brett\21028\dwg\21028\_PF\_Acc.dwg October 19, 2021 - 9:08am

Well Name: <b>Horseshoe Production Facility</b>	Field Date <b>10.07.2021</b>	Prepared for: <b>St Croix Operating, Inc.</b>
S22-T03S-R49W-6 PM	Party Chief <b>BAB</b>	Project#: <b>21117.001</b>
Washington County, CO	Survey Tech <b>N/A</b>	PLS Corporation 532 West 66th Street Loveland, Colorado 80538 970.669.2100 - info@plscorporation.com
	Proj. Manager <b>BAB</b>	

**From:** [Bryant McCall](#)  
**To:** [jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)  
**Subject:** Re: Horseshoe Emergency Response Plan  
**Date:** Wednesday, November 10, 2021 1:30:33 PM  
**Attachments:** [image001.png](#)

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It looks pretty good to me, but the well is located in the Cope Rural Fire District, not South West Washington County Fire.

On Thu, Nov 4, 2021 at 6:48 PM <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)> wrote:

Good evening Bryant,

St. Croix is in the process of proposing another project to COGCC. It is a little further east from the last one, even closer to Cope so I utilized the same contact information from Vaquero.

If you would please take a look at it when you get a chance and let me know if you concur with the plan, I would appreciate it.

Thanks,

Jessica

Jessica Donahue

Compliance Specialist

(303) 888-4862



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Bryant McCall

Washington County OEM  
[oem@co.washington.co.us](mailto:oem@co.washington.co.us)  
1-970-630-8662