

Dust Mitigation Plan

North Cheyenne
Oil and Gas Development

Travis 1-10

This Dust Mitigation Plan has been prepared by Navex Resources, LLC (Navex) for its North Cheyenne oil and gas development in Kit Carson County, Colorado. The Plan addresses the Colorado Oil & Gas Conservation Commission (COGCC) requirement at Rule 304.c.(5) to prepare a Dust Mitigation Plan and the dust mitigation criteria in Rule 427.

1.0 Soil Type

Soil types are listed in Table 1. They are shown on the Soil Unit Map submitted with the Form 2A application. The location will be accessed using a new unpaved access road from Kit Carson County Road 40 (CR 40). The off-location flowline will be buried in the access road and along CR 40 under an easement granted by Kit Carson County to a tie in with the existing Ladder Creek Gathering System. The gathering system is operated by third-party Tumbleweed Midstream.

Table 1. Soil Type

Disturbance	Soil Type	Description
Oil and Gas Location	39: Kimst-Richfield	Kimst-Richfield, eroded complex, 1 to 5 percent slopes. The A horizon is 0 to 5 inches of silty clay loam overlaying 5 to 60 inches of clay loam. Well drained. The depth to restrictive feature is more than 60 inches.
Access	39: Kimst-Richfield 74: Richfield	Richfield, silty clay loam, dry, 0 to 2 percent slopes. The A horizon is 0 to 5 inches of silty clay loam overlaying 5 to 60 inches of clay loam. Well drained. The depth to restrictive feature is more than 60 inches.
Flowline	39: Kimst-Richfield 74: Richfield	See above.

Source: Natural Resources Conservation Service, National Cooperative Soil Survey

2.0 Area of Soil Disturbance

The areas of soil disturbance are shown in Table 2. The Oil and Gas Location will be approximately 3.0 acres. The Working Pad Surface will be approximately 2.7 acres. Interim reclamation will reduce the well pad size to 2.0 acres. The reclaimed area will be stabilized and revegetated with a row crop, in accordance with COGCC Rule 1003 and the surface owner's continued use for dryland farming.

The access road will be an anticipated 20 feet wide and 1,070 feet long.

The off-location gas flowline will be an anticipated 3,710 feet long. It will be buried within the 1,070-foot-long access road and along approximately 2,640 feet (0.5 miles) of CR 40 under an easement granted by Kit Carson County on February 3, 2022. The trenching equipment used for the 2-inch-diameter gas flowline will limit the trench width to 8 inches wide.

Table 2. Area of Disturbance

Disturbance	Soil Type	Disturbance (ac)
Oil and Gas Location	39: Kimst-Richfield	3.0 Pre-production 2.0 After interim reclamation
Access	39: Kimst-Richfield 74: Richfield	0.375 Kimst-Richfield 0.125 Richfield 0.500 Total
Flowline	39: Kimst-Richfield 74: Richfield	0.005 Kimst-Richfield outside of access road 0.036 Richfield outside of access road 0.041 Total outside of access road

3.0 Whether Access Roads are Paved

Access will be provided using unpaved CR 40 and an unpaved new access road.

4.0 Anticipated Truck Trips

Table 3 lists anticipated truck trips. Each location is expected to require 2 days to construct. Well drilling is expected to require 7 to 14 days. Completion is expected to require 6 days. Interim reclamation is expected to require 2 days. The short durations will limit vehicle trips and will minimize fugitive dust. The access road has no nearby receptors; the nearest residence is approximately 1.7 miles south.

Table 3. Anticipated Truck Trips

Activity	Estimated Days	Truck Trips ¹
Construction	2	15
Drilling	7 – 14	222
Completion	6	24
Interim Reclamation	2	4
Production	Monthly	124

¹Truck trips are one way.

5.0 Best Management Practices

Best management practices to minimize fugitive dust are shown in Table 4.

Table 4. Best Management Practices

Activity	Best Management Practices
Speed Restrictions	<ul style="list-style-type: none"> Drivers will be instructed to maintain a speed of 20 mph on the access road to minimize fugitive dust, road wear, and erosion.

Activity	Best Management Practices
Regular Road Maintenance	<ul style="list-style-type: none"> Regular inspection will occur for the access road for evidence of inadequate drainage and formation of potholes. Grading, blading, and filling potholes will be performed to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion.
Restricting Construction Activity During High Wind Days	<ul style="list-style-type: none"> The 2-day well pad construction will be scheduled to avoid high-wind warnings issued for Kit Carson County.
Dust Suppression	<ul style="list-style-type: none"> Blowing soil and failure of the soil to stabilize and form a crust on the location during construction and after interim reclamation will indicate that a dust suppression BMP is needed. In that event, a water truck will be used to wet the pad surface.
Interim Reclamation	<ul style="list-style-type: none"> Area not needed for production will be reclaimed in accordance with Rule 1003.
Dust Tracking	<ul style="list-style-type: none"> Aggregate will be placed at the apron where the access road ties into CR 40. The aggregate will serve as a wheel shaker and erosion control for the tie in to the unpaved county road.
Topsoil Stockpile	<ul style="list-style-type: none"> The stockpile will be mounded with a slope of approximately 1:3 to prevent loose soils and promote vegetative growth. Vehicle tracking perpendicular to the slope angle will be used to improve short term stabilization. Vegetation will be allowed to establish, with crimped straw mulching, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity.