



# Emergency Response Plan

**Navex Resources, LLC  
North Cheyenne**

**Kit Carson County, Colorado**



**PREPARED BY:**

**Navex Resources, LLC**  
1020 E. Levee St., Suite 130  
Dallas, TX 75207

December 2021

## 1.0 INTRODUCTION

Navex Resources, LLC (Navex) prepared this Emergency Response Plan (Plan) for two exploratory oil and gas wells in Kit Carson County, Colorado. The wells are anticipated to produce oil and condensate, natural gas, natural gas liquids, and inert gases, including helium. The wells will be in the following locations:

Travis 1-10: SE  $\frac{1}{4}$  NE  $\frac{1}{4}$ , Section 10, Township 11 South, Range 45 West

Pfaffly 1-12: NW  $\frac{1}{4}$  SW  $\frac{1}{4}$ , Section 12, Township 11 South, Range 46 West

Each well will be a conventional vertical well, approximately 6,000 feet deep. Each location will be approximately 3.0 acres during development and will be downsized to 2.0 acres during production. The well pads will be on farmland leased from private landowners. If the exploratory wells are developed for production, oil and condensate will be trucked off site for commercial sale. Produced water will be trucked off site for disposal. Natural gas will be piped underground to tie into the existing Ladder Creek Gathering System operated by Tumbleweed Midstream. Tumbleweed will pipe natural gas underground from its Ladder Creek Helium Plant in Cheyenne Wells, Colorado, to the Colorado Interstate Gas Company's midstream pipeline and will process the natural gas liquids, inert gases, and helium for end users.

This Plan addresses the requirement from the Colorado Oil & Gas Conservation Commission (COGCC) at Rule 304.c.(8) to prepare an Emergency Response Plan and to coordinate its approval with the local emergency response agency. Specifically, COGCC guidance (February 16, 2021) requires that the Plan contain the information listed in Table 1.

**Table 1. Required Content for the Emergency Response Plan**

1	Local response agency and contact information
2	Date the plan was finalized and approved by the local response agency
3	Directions to the location from the nearest public road intersection
4	Ingress and egress information
5	Legal description (quarter section, township, range, latitude, longitude)
6	Operator and staff emergency contact information
7	Listing of mutual aid agencies
8	Staffing of local and mutual aid agencies
9	Description of site setting including the surrounding area
10	Detailed layout of the Oil & Gas Location
11	Detailed description of the equipment and stored material
12	Sensitive areas
13	Potential impacts, prevention, and mitigation
14	Response equipment, instruments, materials
15	Health and safety action levels, decontamination, staging areas
16	Training coordinated with local responders

## 2.0 REPONSE PLAN ELEMENTS

### 1. LOCAL RESPONSE AGENCY

**Table 2. Local Response Agency and Contact**

Agency	Contact	Contact Information
<b>Burlington Volunteer Fire Department</b> 175 Madison St., Burlington, CO 80807	Mark Weber, Fire Chief	(719) 346-9325 (Dispatch) (719) 340-2357 (Cell) rockingcm@gmail.com

### 2. DATE THE PLAN WAS FINALIZED AND APPROVED

This Emergency Response Plan was provided to the local response agency on December 16, 2021 for review. Appendix A demonstrates the coordination activity and local response.

### 3. DIRECTIONS TO THE LOCATION

#### **Travis 1-10**

From Burlington, CO:

South on U.S. 385 for 12 miles to CR G

Right on CR G for 8 miles

Left onto CR 40

South on CR 40 for 1.5 miles to the location sign on the right. Access to Travis 1-10 is approximately ¼ mile west.

#### **Plaffly 1-12**

From Burlington, CO:

South on U.S. 385 for 12 miles to CR G

Right on CR G for 13 miles

Left on CR 35

South on CR 35 for 1.5 miles to the location sign on the left. Access to Plaffly 1-12 is approximately ¼ mile east.

### 4. INGRESS AND EGRESS INFORMATION

#### **Ingress**

Travis 1-10 is approximately ¼ mile west of the intersection with CR 40 on an unsecured dirt road.

Pfaffly 1-12 is approximately ¼ mile east of the intersection with CR 35 on an unsecured dirt road.

#### **Egress**

The access roads will accommodate emergency vehicles. Finished pad surfaces are approximately 2.7 acres during well development and 2.0 acres during production. There is sufficient turn-around for emergency vehicles and equipment.

## 5. LEGAL DESCRIPTION

**Table 3. Legal Description**

	<b>Travis 1-10</b>	<b>Pfaffly 1-12</b>
Qtr Qtr	SE ¼ NE ¼	NW ¼ SW ¼
Section	10	12
Township	11 South	11 South
Range	45 West	46 West
County	Kit Carson	Kit Carson
Lat	39.108632	39.103763
Lon	-102.432658	-102.516761

## 6. OPERATOR AND STAFF EMERGENCY CONTACT INFORMATION

**Table 4. Operator Contact Information**

<b>Operator and Staff</b>	<b>Contact</b>
<b>Principal</b>	Conrad Mirochna (214) 382-3223 conrad@trekresources.com
<b>Operator</b>	Mark Bieker (785) 650-4836 mabieker@gmail.com

## 7. MUTUAL AID AGENCY

Kit Carson County Sheriff's Office  
Travis Belden, Sheriff  
[sheriff@kitcarsoncounty.org](mailto:sheriff@kitcarsoncounty.org)  
Office (719) 346-8934

Kit Carson County Ambulance Service  
Heather Morris, Director of Operations  
[kcems@kitcarsoncounty.org](mailto:kcems@kitcarsoncounty.org)  
Office (719) 346-7878

## 8. STAFFING OF LOCAL AND MUTUAL AID AGENCIES

The Burlington Volunteer Fire Department is staffed with approximately 28 emergency responders. It provides fire and emergency medical services (EMS) to Burlington, Colorado and eastern Kit Carson County.

The Kit Carson ambulance service is staffed with approximately 30 emergency responders. It has 6 ambulances.

The Kit Carson Sheriff's Office provides law enforcement, public safety services, and mutual aid in Kit Carson County. The sheriff is also fire warden for prairie and forest fires in Kit Carson County.

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## 9. SITE SETTING

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The well pads and surrounding areas are shown in Appendix B. The well pads will be on non-irrigated farmland. The surrounding area consists of rangeland and dryland farming. Native vegetation is primarily blue grama, sideoats grama, needleandthread, western wheatgrass and green needlegrass. No residences are located within a 1-mile radius of either location. There are several dry and abandoned and plugged abandoned oil and gas wells near the Pfaffly 1-12 location.

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## 10. DETAILED LAYOUT

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Detailed layouts of the locations are shown in Appendix C.

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## 11. EQUIPMENT AND STORED MATERIALS

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Well drilling on each well pad will require the equipment and material listed below, which will be removed when well drilling is complete. The equipment is shown on the Drill Rig Layout in Appendix C.

- Drill rig
- Water tanks
- Premix tank
- Fuel tank
- Mud skids
- Mud pump
- Closed loop system
- Draw works
- Steel pits
- Drill cuttings trench
- Combustor
- Pipe racks
- Office trailer
- Geology trailer

During production, the well pad will have the equipment and material listed below. The equipment is shown on the Facility Layout in Appendix C.

- 3 300-bbl Oil tanks
- 1 300-bbl Produced water tank
- 1 75-bbl Separator
- Combustor
- Pump jack
- Chemical container for paraffin control in the wellbore
- Buried drill cuttings trench
- Gas meter and buried gas line

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## 12. SENSITIVE AREAS

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There are no sensitive areas affected by the well pads. The nearest waterbodies are upland swales that do not meet criteria to be designated waters of the state or wetlands. They are field verified to be upland swales. One is located approximately 2,540 feet southwest of the Travis 1-10. One is located approximately 630 feet east of Pfaffly 1-12. There are no residences within 1 mile of either location. The nearest residence is approximately 8,770 feet (1.7 miles) southeast of Travis 1-10 and 8,300 feet (1.6 miles) north of Pfaffly 1-12.

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## 13. POTENTIAL IMPACTS, PREVENTION, AND MITIGATION

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Potential impacts include:

- Storm damage
- Lightening
- Fire or wildfire
- Materials spill or release
- Equipment failure
- Motor vehicle or on-site accident

Navex personnel will be on site daily during well drilling and approximately 7 days per week during production. The site operator will monitor for storm-related damages, equipment failure and maintenance needs, and accidental spills or releases.

Tanks on the location will be inside of lined steel secondary containment sized to contain 150 percent of the volume of the largest tank. This prevents release of a spill to the environment. A Spill Prevention and Countermeasure Control (SPCC) Plan for the location will describe controls and spill response.

Material used on the well pad will be properly containerized and stored to prevent exposure to elements and spills. Site equipment will be maintained in good working condition and operated according to training and manufacturer specifications. The well pad will be kept weed free to avoid ignition of vegetation with a vehicle catalytic converter. Staff and vendors will be expected to limit speeds to avoid accidents.

## 14. RESPONSE EQUIPMENT

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Navex will maintain the following equipment and material on site to respond to a spill or accident:

A backhoe will remain on site during well drilling and completion. The equipment can be used to address a spill and to maintain the surfacing on the well pad and access road.

A drum will remain on site during well drilling, completion, and production that contains a shovel, bucket, absorbent pads, and bags of Sphag Sorb or Oil Hog. The spill response materials will support cleanup of small leaks or spills, such as produced water, oil, lubricants, or incidental fuel leaks. The drum will be inspected a minimum of annually, and material will be replenished, if needed.

In the event of a larger incident, Navex will manage and oversee direct support from a third-party provider to respond to an unintentional release and any potential soil contamination.

## 15. HEALTH AND SAFETY ACTION LEVELS

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The drill foreman and support personnel will be on site during well drilling and development. Their presence will provide continuous communication about site conditions and site safety. During production, a well operator will maintain and monitor the site approximately 7 days per week. The operator will observe secondary containment, the separator, and wellhead areas. The operator will monitor for pressure changes in pipelines that could indicate an issue with equipment or valves.

Sensors in the separator, tanks, and flowlines will measure fluid levels in vessels and pressure changes (increases and drops) in flowlines on an ongoing basis. An electronic alert system will remotely alarm the operator for an out of specification reading. The flowline sensors will be installed on the oil/water/gas flowline to the separator and the gas sales line. In response to an alarm, the operator will manually inspect the location to conduct corrective action. Manual ball valves will be used to shut in the well and to isolate equipment for service, when necessary. Valves will be located at each line in and out of the separator, every tank vessel, and before and after the meter on the gas sales line.

An operation and maintenance log will document health, safety, maintenance, and repair issues. The log will be used to record repairs, any preventative maintenance scheduling, and incidents. This information will help to identify site conditions requiring attention.

In the event of an incident, the well pad will be used for a staging area. If an incident warrants leaving the well pad, the access roads can be used for staging areas at the following locations:

Travis 1-10: the access road entrance at the intersection with CR 40.

Pfaffly 1-12: the bend in the access road, approximately ¼ mile south of the well pad.

## 16. TRAINING COORDINATED WITH LOCAL RESPONDERS

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In the event of an emergency requiring first responders, a unified command will be established between the Navex appointed representative on location and first responders. A command post will be established based on conditions present at the time of an incident. Site personnel will be trained on the types of incidents that may occur on site and the appropriate response. Incidents include those listed below. Through this Plan, potential incidents are being coordinated with the local response agency for agency input.

- Injury from equipment operation
- Equipment failure causing injury
- Equipment failure causing fire
- Equipment failure causing pressure release
- Grass fire or wildfire
- Medical emergency
- Slips, trips, falls
- Insect stings and bites
- Weather-related incident
- Motor vehicle accident

Most accidents consist of minor injuries, such as cuts, scrapes, trips, and sprains. Most medical incidents typically involve cold or heat exposure, sunburn, and insect stings and bites. Vehicles operating at the site will be required to carry general first aid supplies. On-site self-treatment is typically sufficient for an incident until personnel are able to leave the site and, if warranted, receive any additional follow up treatment. Notification to the Navex Principal will occur within 24 hours for all health and safety incidents. Serious incidents may require a 911 response.

Personnel will be instructed that the nearest major medical facility is the Kit Carson County Memorial Hospital in Burlington, CO. It is approximately 22 miles from Travis 1-10 and 27 miles from Pfaffly 1-12.

### NEAREST MEDICAL FACILITY

#### **Kit Carson County Memorial Hospital**

286 16<sup>th</sup> St.

Burlington, CO 80807

(719) 346-5311

24-hour Emergency Room

Directions from:

#### **Travis 1-10**

North on CR 40 for 1.5 miles

Right on CR G for 8 miles

Left on U.S. 385 for 12 miles

Right on Rose Avenue/U.S. 24

Left on 16<sup>th</sup> St.

Hospital is on the right

#### **Pfaffly 1-12**

North on CR 35 for 1.5 miles

Right on CR G for 13 miles

Left on U.S. 385 for 12 miles

Right on Rose Avenue/U.S. 24

Left on 16<sup>th</sup> St.

Hospital is on the right

## **Appendix A**

# **Demonstration of Local Response Agency Coordination**

**Archived:** Thursday, December 16, 2021 1:16:57 PM  
**From:** [Mark Weber](#)  
**Sent:** Thursday, December 16, 2021 12:17:36 PM  
**To:** [gwen.brodsky@aota.tech](mailto:gwen.brodsky@aota.tech)  
**Subject:** Re: Navex Resources, LLC Emergency Response Plan  
**Sensitivity:** Normal

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Thank you for the information

[Mark Weber](#), fire chief

On Thu, Dec 16, 2021, 12:12 PM <[gwen.brodsky@aota.tech](mailto:gwen.brodsky@aota.tech)> wrote:

Chief Weber,

On behalf of Navex Resources, LLC, this email provides an Emergency Response Plan for two shallow, conventional oil and gas wells that Navex proposes to develop in Kit Carson County. The Emergency Response Plan is a permit requirement under state rules administered by the Colorado Oil and Gas Conservation Commission (COGCC). Navex will be applying for a COGCC permit for the well locations in early 2022. The Emergency Response Plan provides details on the well locations, access, equipment on site, potential for hazards, and response materials and procedures.

Your response to this email will help to demonstrate coordination with the local emergency response agency.

Please don't hesitate to let me know if you have questions about the locations that we can help with.

Many thanks,

Gwen

[Gwen Brodsky](#) | Principal Planner

Cell (303) 818-4462

[gwen.brodsky@aota.tech](mailto:gwen.brodsky@aota.tech)

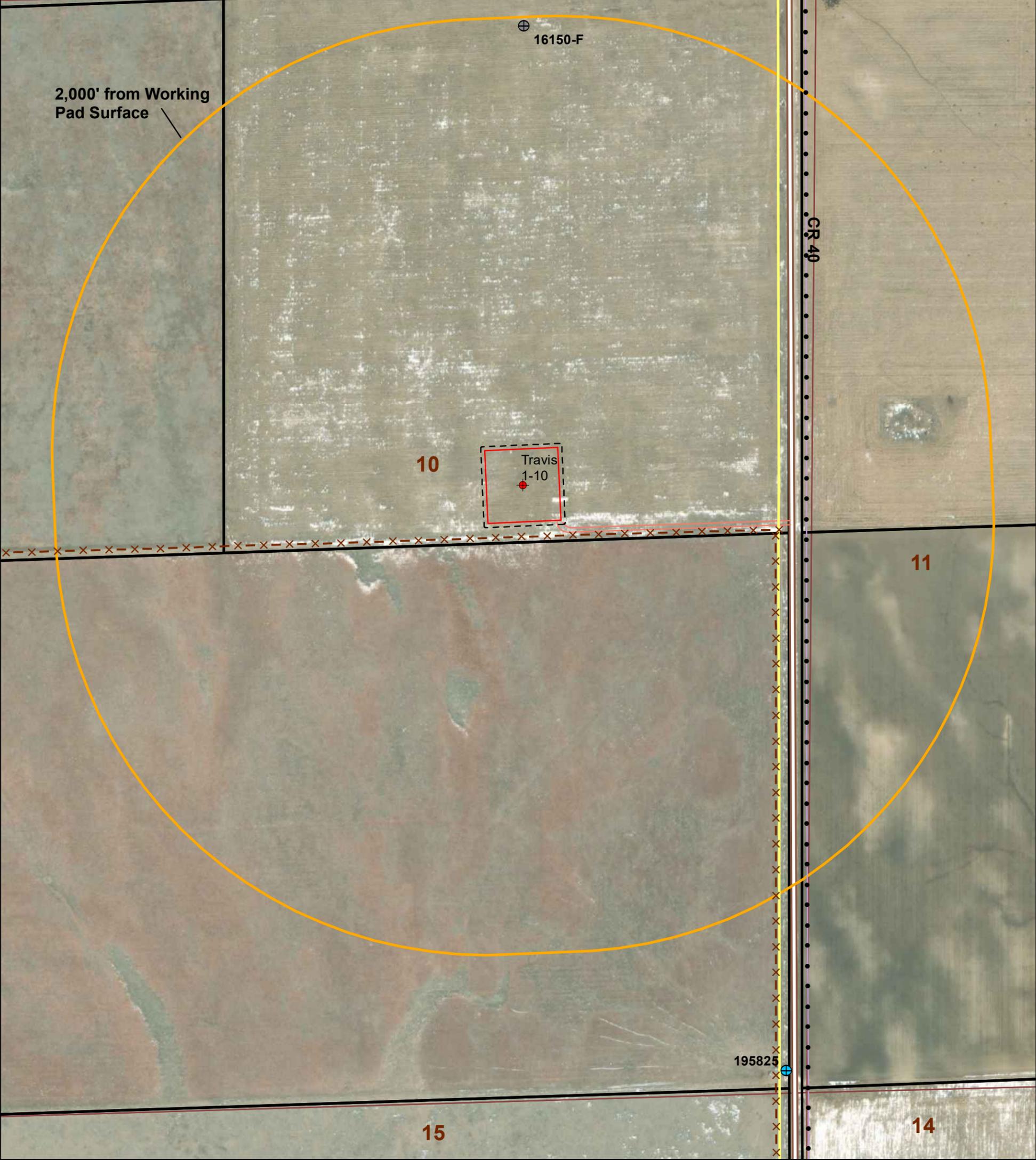
Aota Technical, LLC | Denver, CO

[aota.tech](http://aota.tech)

# **Appendix B**

## **Location Drawings**

Improvements within 2,000' of Working Pad Surface	
Public Road (CR 40)	1,070' E
Above-ground Utility (Transmission)	1,000' E
Above-ground Utility (Telephone)	1,030' E
Fence	70' S



**Aota Technical, LLC**

**NAVEX RESOURCES, LLC**  
Travis 1-10  
**Location Drawing**  
Kit Carson County  
SE1/4NE1/4 Sec. 10, T11S R45W 6th P.M.

Date: 1/13/22  
Figure No. **Figure 1**

**Legend**

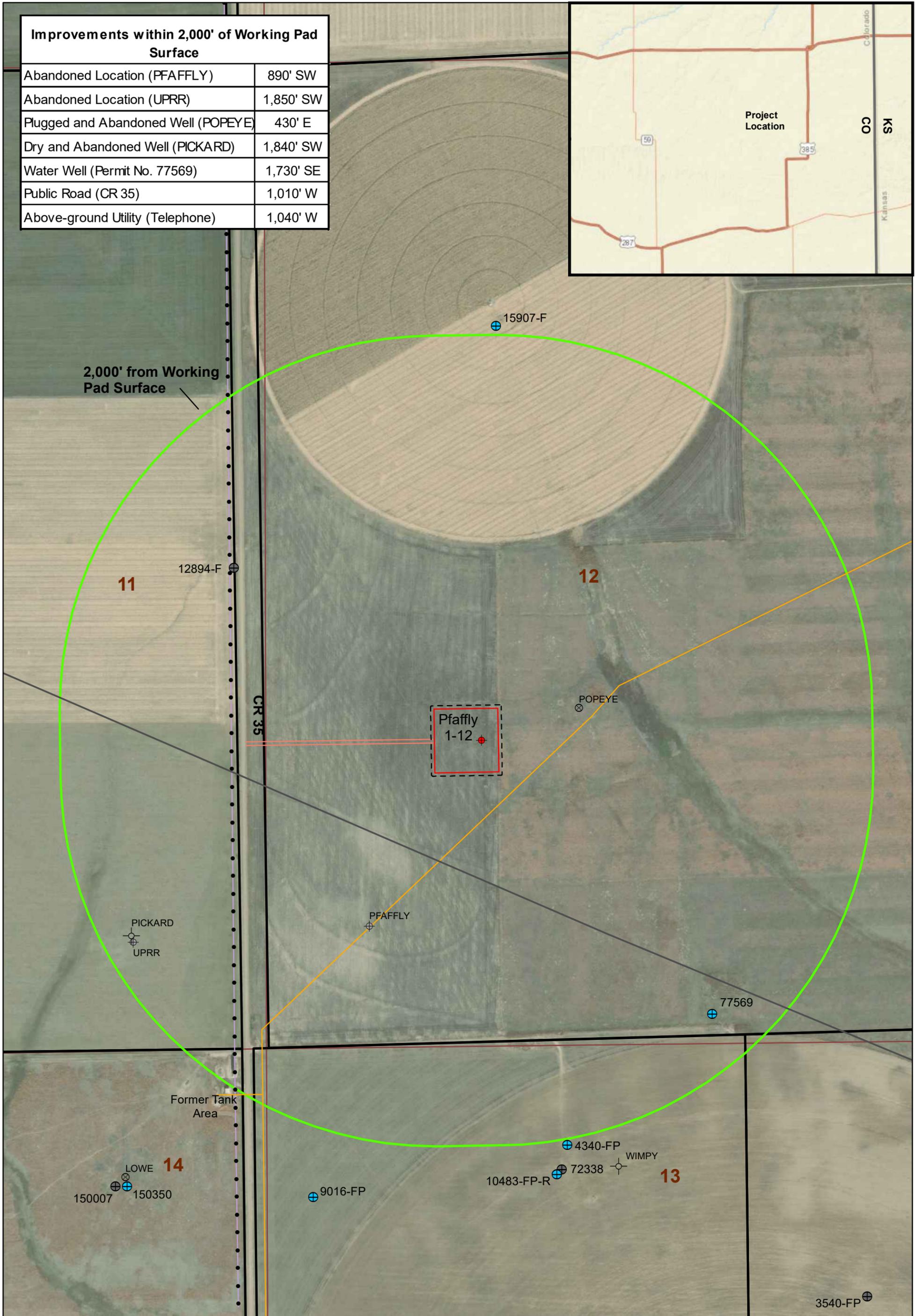
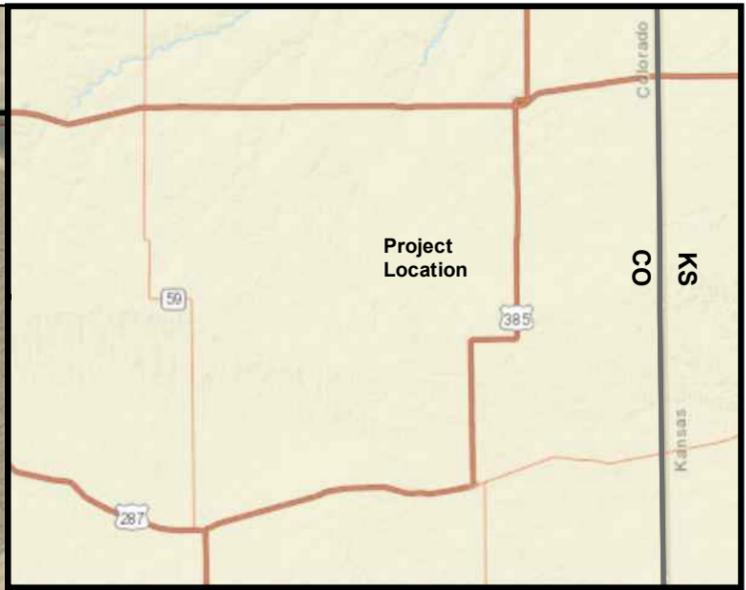
- Proposed Well
- Expired Permit/Undrilled Water Well
- Water Well - Permitted and Drilled
- Working Pad Surface
- Oil and Gas Location
- 2,000' from Working Pad Surface
- New Access Road
- Public Road
- Fence
- Above-ground Transmission Line
- Above-ground Telephone Line
- Parcels

North arrow pointing up.

Scale bar: 0, 125, 250, 500, 750, 1,000 Feet.

Data Source: COGCC GIS Online

Improvements within 2,000' of Working Pad Surface	
Abandoned Location (PFAFFLY)	890' SW
Abandoned Location (UPRR)	1,850' SW
Plugged and Abandoned Well (POPEYE)	430' E
Dry and Abandoned Well (PICKARD)	1,840' SW
Water Well (Permit No. 77569)	1,730' SE
Public Road (CR 35)	1,010' W
Above-ground Utility (Telephone)	1,040' W



**Aota Technical, LLC**

**NAVEX RESOURCES, LLC**

**Pfaffly 1-12**

**Location Drawing**

Kit Carson County  
NW1/4SW1/4 Sec. 12, T11S R46W 6th P.M.

Date: 1/13/22  
Figure No. **Figure 1**

**Legend**

Existing Oil & Gas Wells	Proposed Well	Tumbleweed Midstream Ladder Creek Gathering System
⊗ Plugged & Abandoned	Working Pad Surface	Third-Party Magellan Pipeline
⊖ Dry & Abandoned	Oil and Gas Location	New Access Road
⊕ Abandoned Location	2,000' from Working Pad Surface	Public Road
⊙ Expired Permit/Undrilled Water Well	Parcels	Above-ground Telephone Line
⊕ Water Well - Permitted and Drilled		

Scale: 0 125 250 500 750 1,000 Feet

North Arrow

Data Source: COGCC GIS Online

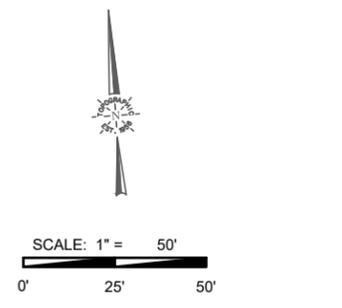
# **Appendix C**

## **Layout Drawings**

KIT CARSON COUNTY

SE 1/4 NE 1/4 SEC. 10

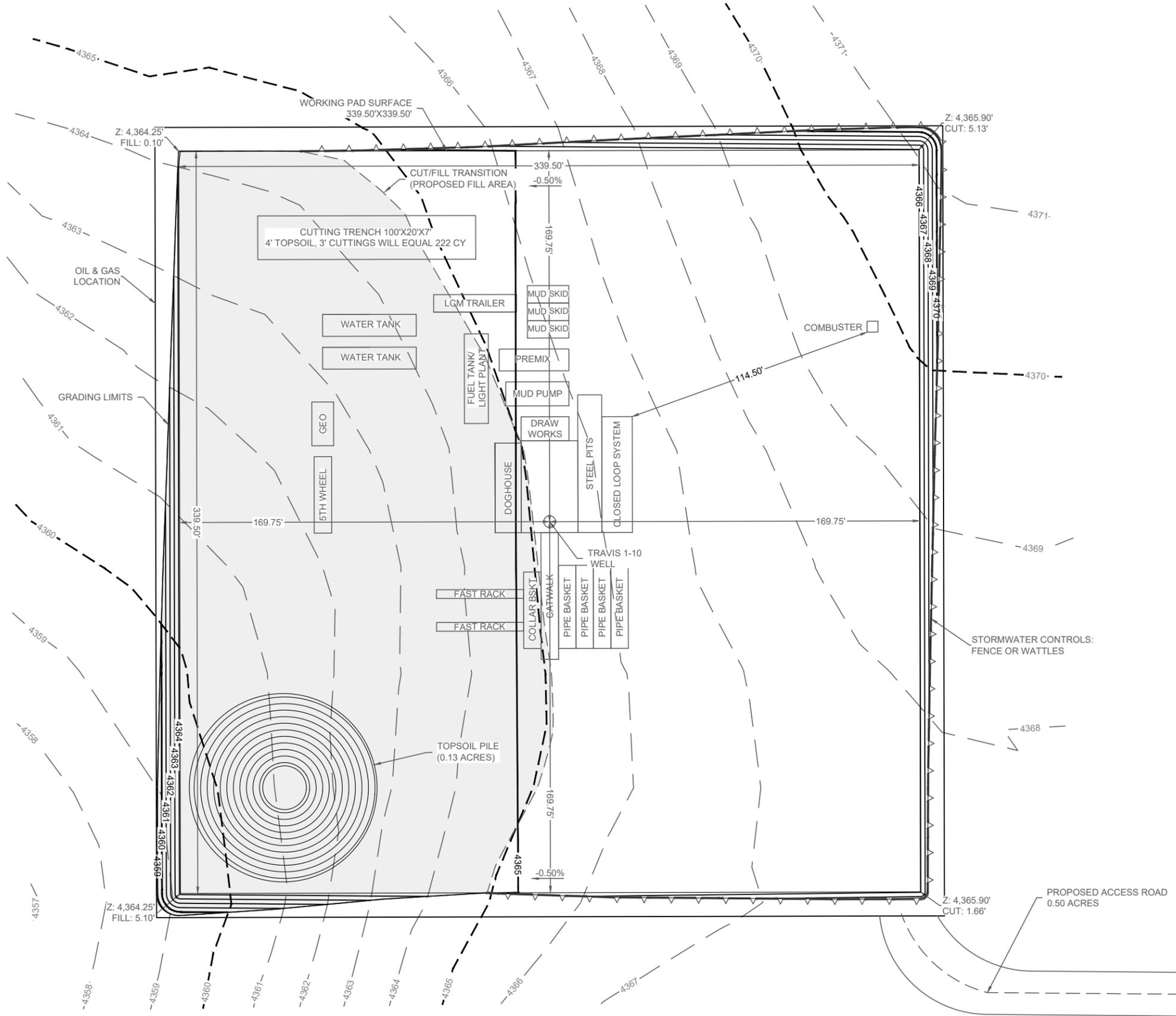
T11S R45W 6<sup>TH</sup> P.M.



- - - - - EXISTING 1' CONTOUR
- - - - - EXISTING 5' CONTOUR
- — — — — PROPOSED 1' CONTOUR
- — — — — PROPOSED 5' CONTOUR
- — — — — STORMWATER CONTROLS: FENCE OR WATTLES
- ▭ FILL AREA
- WELLHEAD

WELLHEAD ELEVATIONS  
 GRADED ELEVATION: 4,365.10'  
 UNGRADED ELEVATION: 4,365.26'

THERE IS NO DISTINCTION BETWEEN RIG LAYOUT AND WELL COMPLETION LAYOUT FOR THIS DEVELOPMENT.



**TOPOGRAPHIC**  
 LOYALTY INNOVATION LEGACY

1400 EVERMAN PARKWAY, STE. 146  
 FORT WORTH, TEXAS 76140  
 TELEPHONE: (817) 744-7512  
 FAX: (817) 744-7548  
 WWW.TOPOGRAPHIC.COM

**PRELIMINARY DRILL RIG LAYOUT**

**TRAVIS #1-10**

**TREK RESOURCES INC.**

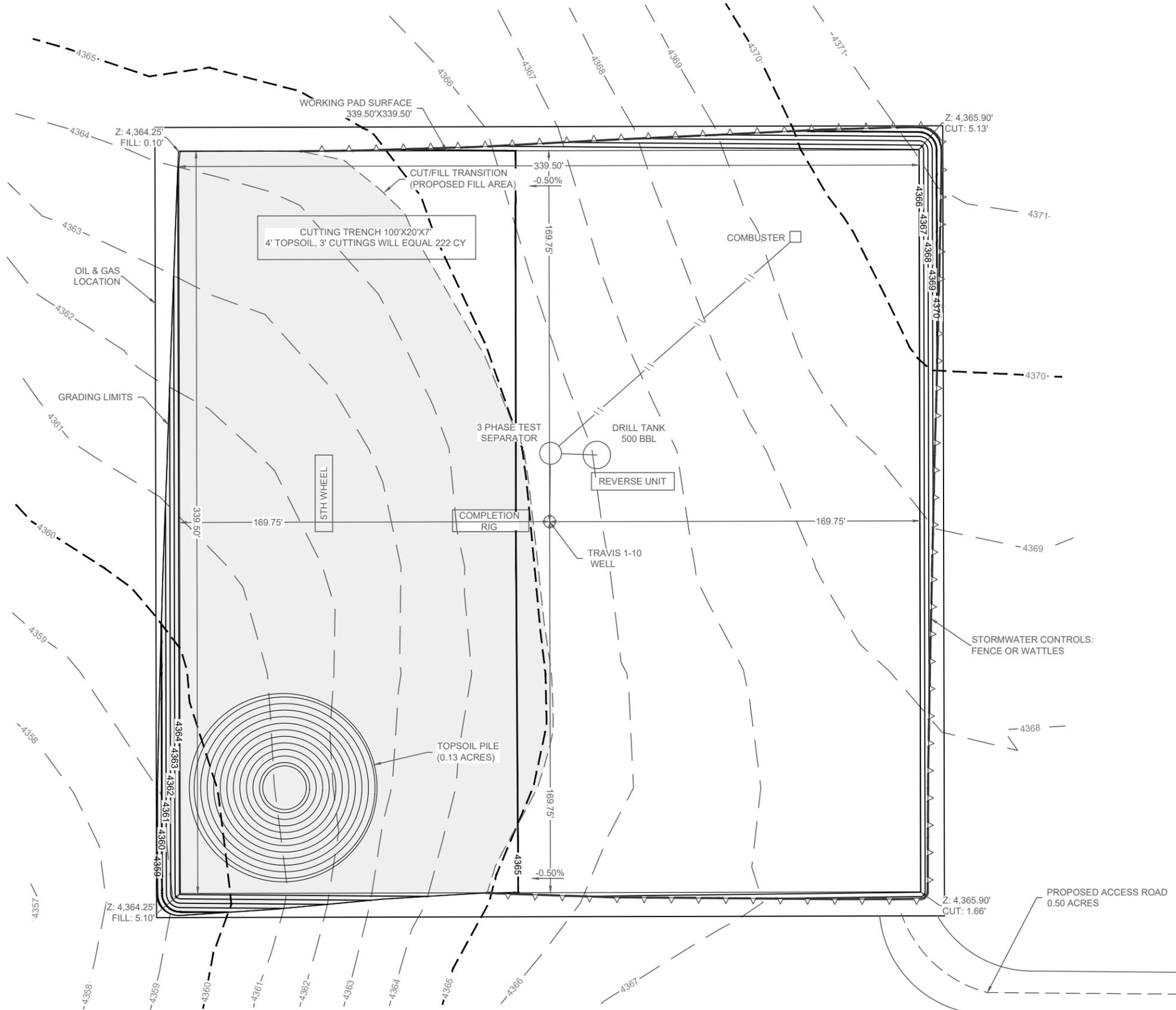
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DATE:	12/01/21
DRAWN BY:	TJM
REVIEWED BY:	CCC
SCALE:	1" = 50'
SHEET:	3 OF 6
REVISION:	
XXX	XXXXXX
XXX	XXXXXX
XXX	XXXXXX

KIT CARSON COUNTY

SE 1/4 NE 1/4 SEC. 10

T11S R45W 6<sup>TH</sup> P.M.



--- EXISTING 1' CONTOUR

--- EXISTING 5' CONTOUR

--- PROPOSED 1' CONTOUR

--- PROPOSED 5' CONTOUR

--- STORMWATER CONTROLS: FENCE OR WATTLES

--- PROPOSED PIPELINE

■ FILL AREA

○ WELLHEAD

WELLHEAD ELEVATIONS

GRADED ELEVATION: 4,365.10'  
UNGRADED ELEVATION: 4,365.26'



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WELL COMPLETION & STIMULATION LAYOUT

TRAVIS #1-10

TREK RESOURCES INC.

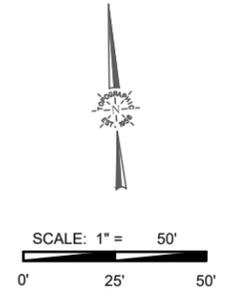
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KIT CARSON COUNTY

SE 1/4 NE 1/4 SEC. 10

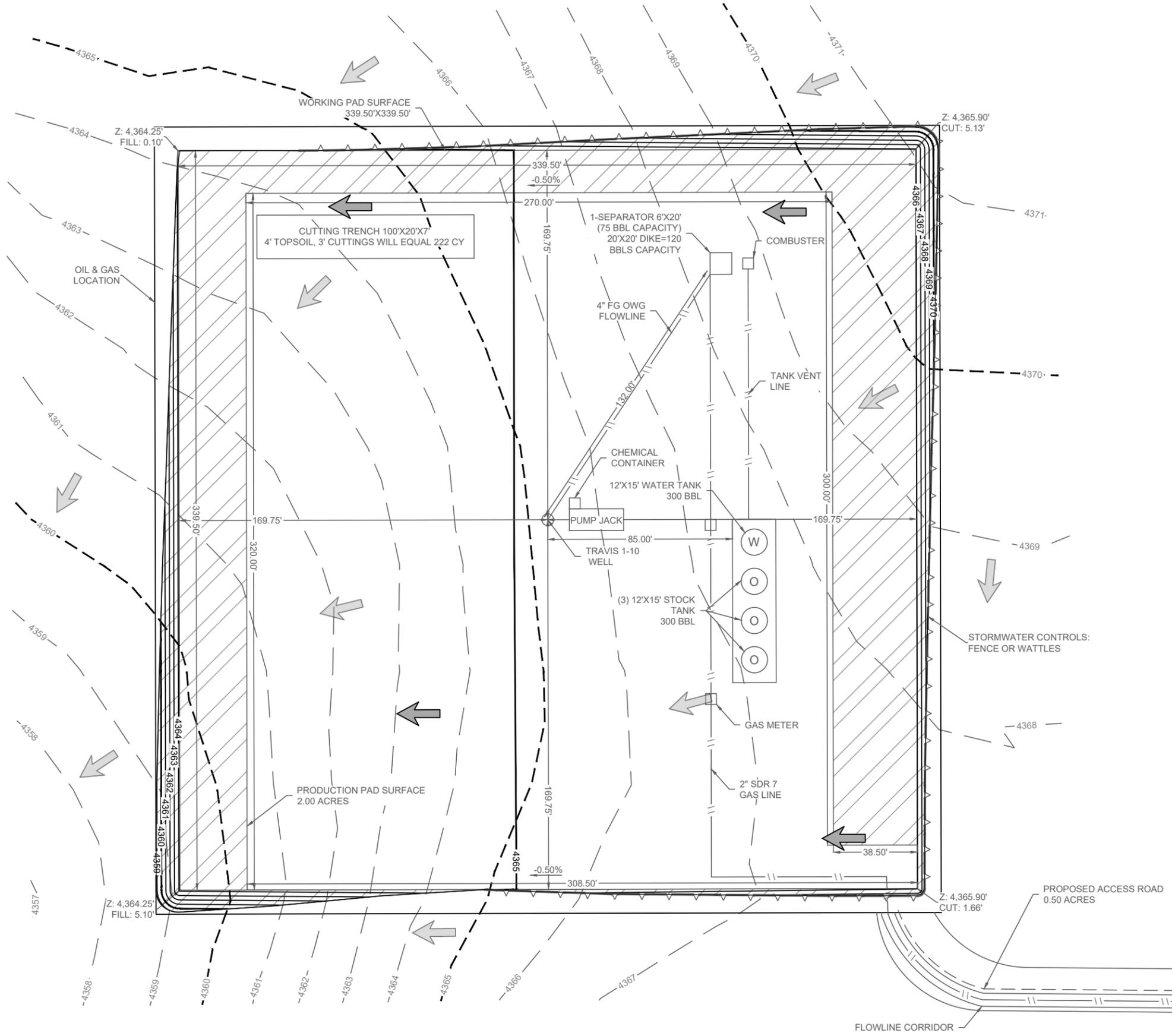
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- EXISTING 1' CONTOUR
- EXISTING 5' CONTOUR
- PROPOSED 1' CONTOUR
- PROPOSED 5' CONTOUR
- STORMWATER CONTROLS: FENCE OR WATTLES
- PROPOSED PIPELINE
- RECLAMATION AREA
- WELLHEAD
- ➔ PROPOSED DRAINAGE
- ➔ EXISTING DRAINAGE

WELLHEAD ELEVATIONS  
 GRADED ELEVATION: 4,365.10'  
 UNGRADED ELEVATION: 4,365.26'

DISTURBANCE ACREAGES:  
 ORIGINAL DISTURBED AREA: 3.00 ACRES  
 INTERIM RECLAMATION AREA: 1.00 ACRES  
 UNRECLAIMED AREA: 2.00 ACRES  
 FLOWLINE ROW: 0.55 ACRES



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**FACILITIES LAYOUT**

**TRAVIS #1-10**

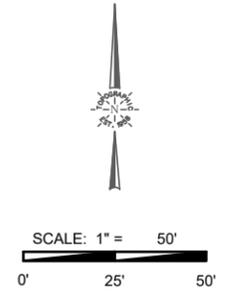
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KIT CARSON COUNTY

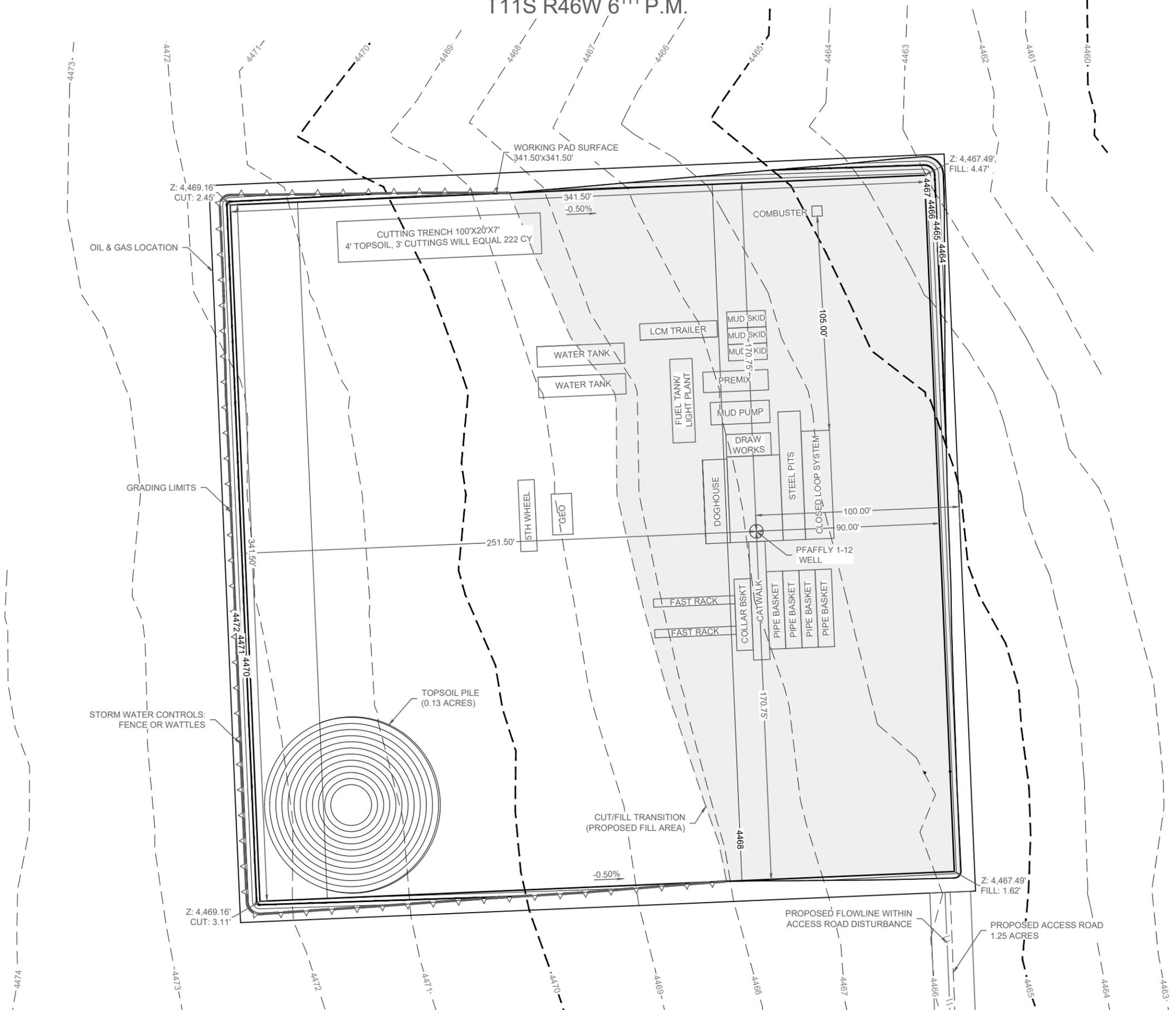
NW 1/4 SE 1/4 SEC. 12  
T11S R46W 6TH P.M.



- - - - - EXISTING 1' CONTOUR
- - - - - EXISTING 5' CONTOUR
- PROPOSED 1' CONTOUR
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- ▭ FILL AREA
- WELLHEAD

WELLHEAD ELEVATIONS  
GRADED ELEVATION: 4,467.93'  
UNGRADED ELEVATION: 4,466.88'

THERE IS NO DISTINCTION BETWEEN RIG LAYOUT AND WELL COMPLETION LAYOUT FOR THIS DEVELOPMENT.



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**PRELIMINARY DRILL RIG LAYOUT**

**PFAFFLY #1-12**

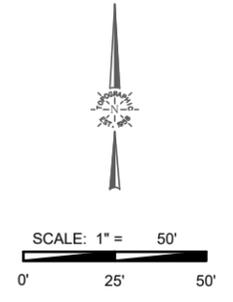
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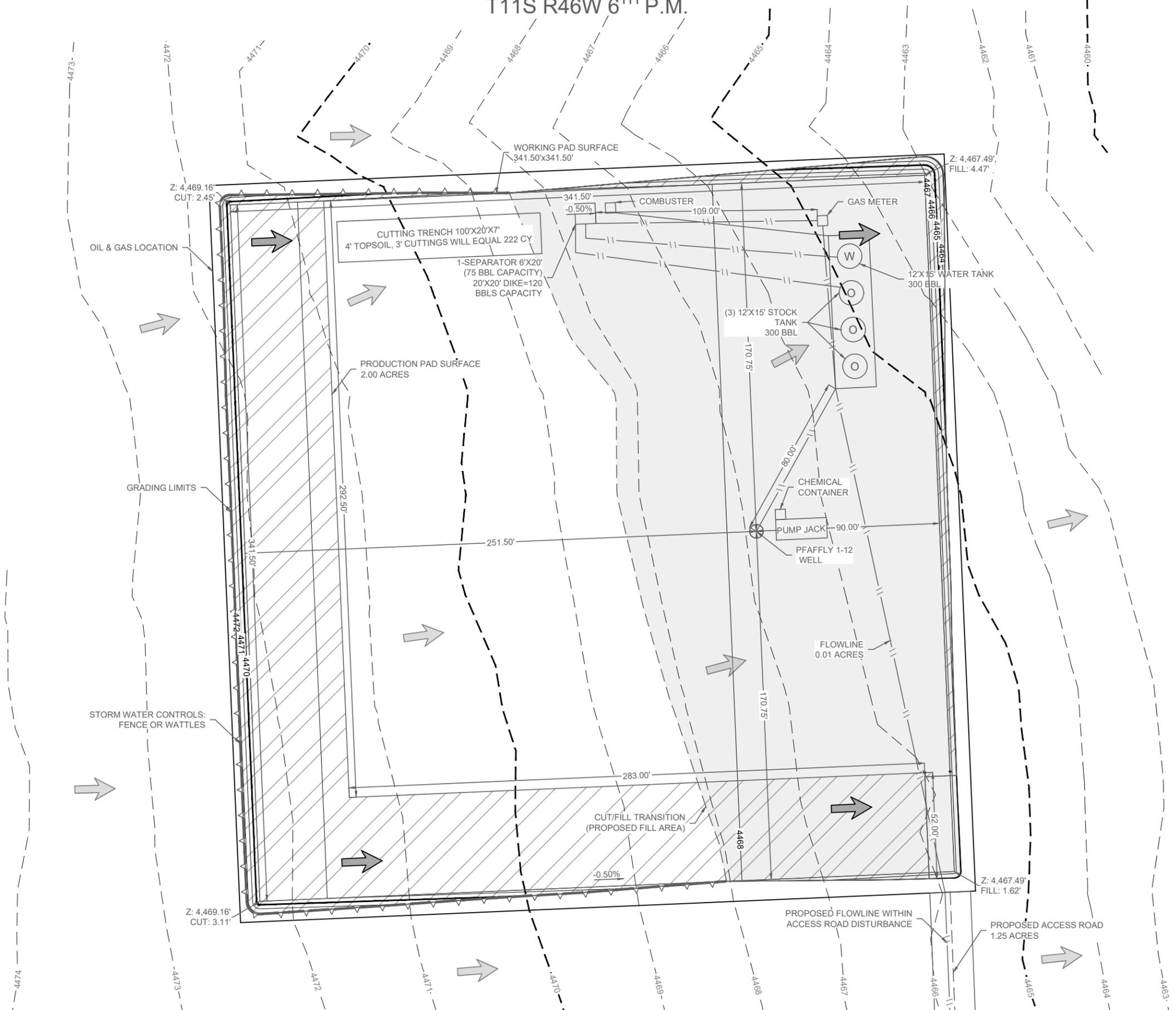
KIT CARSON COUNTY  
 NW 1/4 SE 1/4 SEC. 12  
 T11S R46W 6TH P.M.



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- ▨ RECLAMATION AREA
- WELLHEAD
- ➔ PROPOSED DRAINAGE
- ➔ EXISTING DRAINAGE

WELLHEAD ELEVATIONS  
 GRADED ELEVATION: 4,467.93'  
 UNGRADED ELEVATION: 4,466.88'

DISTURBANCE ACREAGES:  
 ORIGINAL DISTURBANCE (AC): 3.00  
 INTERIM RECLAIM AREA (AC): 1.00  
 UNRECLAIMED AREA (AC): 2.00  
 FLOWLINE ROW (AC): 0.01



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**FACILITIES LAYOUT**

**PFAFFLY #1-12**

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