

FORM  
2A

Rev  
02/20

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402342785

Date Received:

05/27/2020

Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: 316591

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**316591**

Expiration Date:

**10/06/2023**

This location assessment is included as part of a permit application.

CONSULTATION

- This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- This location is in a sensitive wildlife habitat area.
- This location is in a wildlife restricted surface occupancy area.
- This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 96850  
Name: TEP ROCKY MOUNTAIN LLC  
Address: PO BOX 370  
City: PARACHUTE    State: CO    Zip: 81635

Contact Information

Name: Vicki Schoeber  
Phone: (970) 263-2721  
Fax: ( )  
email: vschoeber@terraep.com

FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): \_\_\_\_\_
- Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- Waste Management Surety ID (Rule 704): \_\_\_\_\_

LOCATION IDENTIFICATION

Name: FEDERAL    Number: RG 41-18-297  
County: RIO BLANCO  
Quarter: NWNE    Section: 18    Township: 2S    Range: 97W    Meridian: 6    Ground Elevation: 6621

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 648 feet FNL from North or South section line  
2087 feet FEL from East or West section line

Latitude: 39.881847    Longitude: -108.322678

GPS Quality Value: 3.2    Type of GPS Quality Value: PDOP    Date of Measurement: 08/23/2019

Instrument Operator's Name: J. KIRKPATRICK

LOCAL GOVERNMENT INFORMATION

County: RIO BLANCO    Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition below.  Yes  No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location.

The local government siting permit type is: Oil or Gas Well Pad Special Use/Building Permit

The local government siting permit was filed on: 04/20/2020

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

Rio Blanco County approved the Oil or Gas Well Pad Special Use/Building Permit #COGW-0002-20 on 4/20/2020.

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Well Site is served by Production Facilities	<u>335602</u>	<u></u>

## FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	<u>17</u>	Oil Tanks*	<u></u>	Condensate Tanks*	<u>6</u>	Water Tanks*	<u>1</u>	Buried Produced Water Vaults*	<u></u>
Drilling Pits	<u>1</u>	Production Pits*	<u></u>	Special Purpose Pits	<u></u>	Multi-Well Pits*	<u></u>	Modular Large Volume Tanks	<u></u>
Pump Jacks	<u></u>	Separators*	<u>20</u>	Injection Pumps*	<u></u>	Cavity Pumps*	<u></u>	Gas Compressors*	<u></u>
Gas or Diesel Motors*	<u></u>	Electric Motors	<u></u>	Electric Generators*	<u></u>	Fuel Tanks*	<u></u>	LACT Unit*	<u></u>
Dehydrator Units*	<u></u>	Vapor Recovery Unit*	<u></u>	VOC Combustor*	<u>3</u>	Flare*	<u></u>	Pigging Station*	<u></u>

## OTHER FACILITIES\*

Other Facility Type	Number
Natural Gas Meter(Bargath/Williams)	<u>1</u>

\*Those facilities indicated by an asterisk (\*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

New pipeline installations will include:  
1 - 8" steel gas pipeline (approx. 1397') installed by Bargath between the meter and existing 16" Bargath gas gathering line  
1 - 6" flexsteel water pipeline (approx. 1502') between separators  
17 - 2" steel wellhead flowlines  
1 - 2" fuel gas line  
3 - 2" flexpipe condensate dump lines  
1 - 2" flexpipe produced water dump line  
1 - 1" steel natural gas supply line  
1 - 4" aluminum surface line from the tank battery to ECDs  
An 80 bbl vent tank will be located in the pipeline ROW and will be used for venting the pipeline.  
See attached Plan of Development Summary for details on the proposed temporary surface pipelines to be used to support remote frac operations.

## CONSTRUCTION

Date planned to commence construction: 10/09/2020 Size of disturbed area during construction in acres: 6.09  
Estimated date that interim reclamation will begin: 05/01/2022 Size of location after interim reclamation in acres: 1.35  
Estimated post-construction ground elevation: 6621

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Recycle/reuse

Cutting Disposal: ONSITE Cuttings Disposal Method: Cuttings trench

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

Centralized E&P Waste Management Facility ID, if applicable: \_\_\_\_\_

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Bureau of Land Management Phone: 970-878-3800

Address: White River Field Office Fax: \_\_\_\_\_

Address: 220 East Market Street Email: \_\_\_\_\_

City: Meeker State: CO Zip: 81641

Surface Owner:  Fee  State  Federal  Indian

Check all that apply. The Surface Owner:  is the mineral owner

is committed to an oil and Gas Lease

has signed the Oil and Gas Lease

is the applicant

The Mineral Owner beneath this Oil and Gas Location is:  Fee  State  Federal  Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: oil and gas lease

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

Date of Rule 306 surface owner consultation \_\_\_\_\_

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s): \_\_\_\_\_

## CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe): \_\_\_\_\_

Subdivided:  Industrial  Commercial  Residential

**Future Land Use (Check all that apply):**

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe): \_\_\_\_\_

Subdivided:  Industrial  Commercial  Residential

## CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	2454 Feet	2289 Feet
Building Unit:	5280 Feet	5280 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	5280 Feet	5280 Feet
Above Ground Utility:	5280 Feet	5280 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	5181 Feet	5145 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.  
 - Enter 5280 for distance greater than 1 mile.  
 - Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.  
 - Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.  
 -For measurement purposes only, Production Facilities should only include those items with an asterisk(\*) on the Facilities Tab.

## SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)?  Yes  No

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- Buffer Zone  
 Exception Zone  
 Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.  
 - Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.  
 - Urban Mitigation Area - as defined in 100-Series Rules.  
 - Large UMA Facility – as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: \_\_\_\_\_

## FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on- or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

## SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 70—Redcreek-Rentsac complex, 5 to 30 percent slopes

NRCS Map Unit Name: 73—Rentsac channery loam, 5 to 50 percent slopes

NRCS Map Unit Name: \_\_\_\_\_

### PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes  No

Plant species from:  NRCS or,  field observation Date of observation: 07/12/2019

List individual species: Bull Thistle

### Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- Alpine (above timberline)
- Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area:  No  Yes

Distance to nearest

downgradient surface water feature: 454 Feet

water well: 4840 Feet

Estimated depth to ground water at Oil and Gas Location 500 Feet

Basis for depth to groundwater and sensitive area determination:

Depth to groundwater was estimated to be deeper than 500 feet bgs based on the closest constructed bedrock industrial/commercial water well, located 4840' east-northeast, Permit No. 68234-F; ExxonMobil; completed in the Mesaverde Formation; total depth – 12,104' bgs; pumping rate – 50 gpm. This well is constructed in a similar topographic/geologic setting and targeted groundwater at depths greater than 500 feet.

The vegetative cover in the immediate vicinity of this well pad is dominated by sage, juniper, and bunch grasses typical of the upland xeric environment. No seeps or springs were identified during the desk top review which would suggest the presence of shallow groundwater.

Location is a sensitive area due to proximity to surface water.

Is the location in a riparian area:  No  Yes

Was an Army Corps of Engineers Section 404 permit filed  No  Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

Is the Location within a Floodplain?  No  Yes Floodplain Data Sources Reviewed (check all that apply)

Federal (FEMA)

State

County

Local

Other \_\_\_\_\_

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 609

## WILDLIFE

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on 07/15/2019

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area

Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)

Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)

Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)

Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## RULE 502.b VARIANCE REQUEST

Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments TEP Rocky Mountain LLC (TEP) is proposing to drill, complete and operate 16 new wells from this existing location which currently has 1 producing well.

The Federal RGU 23-7-297 pad (Loc ID #316408) will be utilized for remote completions operations for the Federal RG 41-18-297 pad. Produced water will be stored at the RG 23-6-297 pad (Loc ID #335602).

A utility tower with two small buildings is located southwest of the well pad, approximately 2447 feet from the closest well and approximately 2270 feet from the closest separators.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: \_\_\_\_\_ Date: 05/27/2020 Email: vschoeber@terraep.com

Print Name: Vicki Schoeber Title: Regulatory Specialist

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved:  \_\_\_\_\_ Director of COGCC Date: 10/7/2020

## Conditions Of Approval

**All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.**

### COA Type

### Description

Wildlife	If TEP plans on conducting drilling operations in April 2021, TEP will consult with BLM and CPW to evaluate the potential impact to wintering big game and determine/agree upon mitigation measures to offset adverse impacts. Prior to commencing operations, TEP will submit and receive approval of a BLM sundry notice (detailing the proposed operations and mitigation required to offset adverse impacts to wintering big game to allow for drilling activities to commence in April 2021); for a Timing Limitation (TL) Exception from the the big game winter period of December 1 to April 30. This exception to allow drilling and/or completion activities to take place within the big game winter TL, has been approved in the September 2020 BLM Environmental Assessment for the Lower Wagonroad Ridge Master Development Plan. Once the BLM approves the TL Exception, TEP will request a waiver from CPW for the Mule Deer Winter Timing Limitation of December 1 to April 15. TEP will submit the CPW waiver on a Form 4 Sundry Notice to COGCC requesting relief from the Mule Deer Winter Timing Limitation prior to conducting operations at the RG 41-18-297 location.
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## Best Management Practices

No	BMP/COA Type	Description
1	Planning	<p>Prior to submittal of the Application for Permit to Drill (BLM-APD/Form 2) and the Oil and Gas Location Assessment (Form 2A), TEP conducted onsite and meetings with the Bureau of Land Management (BLM), Colorado Parks and Wildlife, and the associated private landowners. These onsites and meetings were held to discuss TEP's proposed development plan for the RG 41-18-297 pad and associated support facilities (RGU 23-7-297 Pad, RGU 23-6-297 Pad, Love Ranch Centralized Waste Management Facility). Changes were made to the proposed development plan based on feedback received from all stakeholders and included in the APD/Form 2A.</p> <p>The development plan for the RG 41-18-297 pad was prepared to minimize surface impacts to the greatest extent possible through the development of multiple wells from one location by utilizing directional drilling technology, collocating access road and utility corridors within the same area, and through the transportation of produced water to centralized storage facilities on the RGU 23-6-297 pad, thus minimizing the surface area needed to conduct operations on the RG 41-18-297 pad location.</p>
2	Pre-Construction	<p>Prior to commencement of construction activities, TEP will hold a pre-construction meeting with contractors to review proposed site construction and installation of stormwater control measures. The site will be staked for construction prior to pre-construction meeting. Staking will identify the boundaries of the proposed site to protect existing vegetation in areas that should not be disturbed.</p>
3	General Housekeeping	<p>Storage of material and fluids on location during construction, drilling, completion, and production operations will be conducted in a neat and orderly manner with regards to potential fire hazards on site.</p>
4	Storm Water/Erosion Control	<p>Stormwater BMPs will be in place during all phases of development to control stormwater runoff in a manner that minimizes erosion, transportation of sediment offsite, and site degradation.</p> <p>Stormwater BMP's will include a minimum 2-foot compacted earthen perimeter berm around the entire working pad surface and around the cuttings management areas along the northern portions of the expanded well pad. Topsoil will be windrowed along the western side of the location while and excess spoils material will be placed along the northern portions of the location; both within the disturbed area. There currently is a system of exterior diversion ditches around the disturbed area. These ditches will be upgraded with armoring and rocked check dams and will tie into four sediment catchment basins; one existing along the southern edge of disturbance near the entrance of the pad, and three proposed along the western and northwestern portions (fill slope) of disturbance area. The access road has rocked check dams. Site degradation control measures will include grading, slope stabilization (seeding, mulching, surface roughening of the topsoil and excess soil stockpiles), and the use of gravel and roadbase materials for surfacing.</p> <p>Stormwater controls will be installed with consideration given to worker safety, wildlife, and site access. A post-construction stormwater program will be developed for the facility as required per Rule 1002.f.(3). Stormwater is also addressed under a field-wide Stormwater Management Plan (CDPHE Certification COR404628).</p> <p>See the 'Construction Layout Drawings' and 'Interim Reclamation and Stormwater Plan' attachments for the existing and planned stormwater BMPs proposed for installation at the location for further details.</p>
5	Dust control	<p>Fugitive dust control measures will be employed during all phase of development to minimize dust pollution. Dust control measures include but are not limited to the application of fresh water via water trucks along access roads during construction, drilling, and completion operations, speed restrictions, periodic road maintenance, road surfacing (i.e. gravel), and automation of wells to reduce truck traffic. Dust control measures will be employed on an as needed based during all phases of development</p>
6	Construction	<p>All construction equipment and materials will be contained within the proposed limits of the oil and gas location, access roads, or pipeline corridors. Topsoil will be stripped from the site and segregated from subsoil for reuse during pad reclamation. Fugitive dust control measures will be implemented as described in the dust control section.</p>

7	Drilling/Completion Operations	Closed loop drilling system will be utilized during drilling of all wells at this location, which eliminates the need for a fluid-containing reserve pit. TEP will utilize remote centralized hydraulic fracturing operations during well completion operations minimizing un-necessary traffic and activities at the pad location. Water used for remote completions operations will be transported through existing pipelines minimizing vehicle traffic on existing roadways. TEP will ensure 110 percent secondary containment for any volume of fluids contained at the well site during drilling and completions operations.
8	Interim Reclamation	Certified weed-free native seed in seed mixes that have been agreed to by BLM and CPW will be used. Soil samples may be taken following site reclamation to analyze soil characteristics and determine if soil amendments should be added to topsoil during reclamation activities to promote vegetation growth. TEP will conduct period monitoring of reclamation success as required by Federal and State regulations.
9	CPW-Wildlife - Avoidance-Black Bear	The operator agrees to report bear conflicts immediately to CPW staff.
10	CPW-Wildlife - Mitigation-Deer and Elk	The RG 41-18-297 pad falls within CPW-identified mule deer critical winter range. Based on the current drilling schedule (as of June 1, 2020), TEP is proposing to begin drilling operations on this well pad in April 2021, which would occur during the BLM Big Game Winter Range Timing Limitation of December 1 to April 30 annually. However, delays associated with ongoing and upcoming drilling operation may delay drilling activities on the RG 41-18-297 until later in 2021. For this reason, TEP will consult with CPW and BLM prior to any proposed operations, including construction, drilling, or completion operations, which may occur during the Big Game Winter Range Timing Limitation. Consultation will begin approximately 1 to 2 months prior to proposed winter operations. During consultation, wildlife impacts will be evaluated to determine if compensatory mitigation will be required to offset adverse impacts to wildlife. Compensatory mitigation will be agreed upon by all parties, and if required, a sundry notice will be submitted to BLM detailing the proposed operations and mitigation required to offset adverse impacts to wintering big game. However, if drilling at this location is delayed beyond the winter timing limitation of April 30, no compensatory mitigation measures will be required.
11	CPW-Wildlife - Minimization-Deer and Elk	TEP is proposing to install a produced water pipeline between the RG 41-18-297 pad and TEP's existing water management system, which will minimize the long-term operational activities on the oil and gas location, reduce truck traffic to the location, and minimize the overall disturbance footprint at the RG 41-18-297 pad. TEP will be upgrading facilities at the RGU 23-6-297 pad to support centralized storage and management of produced water from the RG 41-18-297 pad. These upgrades will reduce surface disturbance, operational activities, and impacts to wildlife and habitat resources at the RG 41-18-297 pad.
12	CPW-Wildlife - Minimization-Deer and Elk	The operator and its contractors agree to restrict well site visitations to portions of the day between 10:00 a.m. and 3:00 p.m. when possible, during winter season (December 1 through April 15) within CPW-identified mule deer critical winter range and elk winter concentration areas.
13	CPW-Wildlife - Minimization-Deer and Elk	TEP will preclude from the use of aggressive CPW-identified non-native grasses and shrubs in mule deer and elk habitat and will reclaim the site using BLM- and CPW-identified native shrubs, grasses and forbs appropriate to the ecological site disturbed. Certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife, will be used. Any seed mix planned for interim reclamation will be approved by BLM and CPW prior to implementation. TEP will use certified, weed free grass hay, straw, hay or other mulch materials used for the reseeding and reclamation of disturbed areas. Soil amendments may be added to topsoil during reclamation activities to promote vegetation growth.
14	CPW-Wildlife - Minimization-Deer and Elk	To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to the posted speed restrictions. Remote telemetry equipment will be installed on location to minimize site visits and truck traffic.
15	CPW-Wildlife - Minimization-Black Bear	The operator will implement Rule 1204.a.1 by storing all garbage, trash, and debris in enclosed bear proof trash containers and transported to an approved disposal facility once per week during drilling and completions operations. No garbage, trash, and debris will be disposed of on location. The well site and access road will be kept free of trash and debris at all times.

16	CPW-Wildlife - Minimization-RAPTORS	Exclusionary devices will be installed to prevent bird and other wildlife from accessing equipment stacks , vents, and openings.
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Total: 16 comment(s)

### Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2109261	AERIAL PHOTO MAP
2109262	SENSITIVE WILDLIFE HABITAT (SWH) AREAS MAP
2109266	OBJECTIVE CRITERIA REVIEW MEMO
2109304	APPROVED BLM ENVIRONMENTAL ASSESSMENT, LOWER WAGONROAD RIDGE MDP
2109305	APPROVED BLM APD FOR THE FEDERAL RG 543-18-297 WELL
21092601	BLM's FINDING OF NO SIGNIFICANT IMPACTS, SIGNED
210342785	BLM's DECISION RECORD, SIGNED
402342785	FORM 2A SUBMITTED
402398673	ACCESS ROAD MAP
402398674	CONST. LAYOUT DRAWINGS
402398677	HYDROLOGY MAP
402398678	INTERIM RECLAMATION AND STORMWATER CONTROL PLAN
402398680	LOCATION DRAWING
402398681	MULTI-WELL PLAN
402398684	REFERENCE AREA MAP
402398687	SENSITIVE AREA DATA
402398689	WASTE MANAGEMENT PLAN
402398708	LOCATION PICTURES
402398710	NRCS MAP UNIT DESC
402398711	NRCS MAP UNIT DESC
402398712	REFERENCE AREA PICTURES
402399285	FACILITY LAYOUT DRAWING
402399295	OBJECTIVE CRITERIA REVIEW CHECKLIST
402399745	PLAN OF DEVELOPMENT SUMMARY AND DRAWINGS
402406244	DOW CONSULTATION

Total Attach: 25 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Final Review	Final Review task completed	10/07/2020
OGLA	10/06/2020 - The Objective Criteria Review Memo (Doc# 2109266) is attached to this Form 2A; following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181; passed the OGLA task.	10/06/2020
OGLA	10/06/2020 - revised the ' Objective Criteria Review Memo' to include updated Federal approvals and ; received the BLM Finding of No Significant Impacts and Decision Record for the Lower Wagonroad Ridge Master Development Plan from operator; attached both documents to this Form 2A;	10/06/2020
OGLA	09/30/2020 - received the approved BLM Environmental Assessment for the Lower Wagonroad Ridge Master Development Plan and one of the sixteen approved BLM APDs for the Federal RG 543-18-297 Well; attached both documents to this Form 2A;	09/30/2020
OGLA	06/30/2020 - conducted further director review; final approval delayed on approval of the Federal APDs, slated for August 2020 per the BLM White River Field Office;	06/30/2020
Permit	Passed Permit review.	06/24/2020

OGLA	06/23/2020 - provided the CPW-agreed upon big game (deer and elk) mitigation BMP for director review by management and staff; OGLA task to pending;	06/23/2020
OGLA	06/23/2020 - passed OGLA-181 task; second director review completed; finalized 'Objective Criteria Review Memo';	06/23/2020
DOW	<p>This Form 2A # 402342785 is being submitted by TEP for reconstruction and expansion of the existing Federal RG 41-18-297 well-pad facility (COGCC Loc ID 316591) for the 16 proposed wells on Federal surface in Section 18 of Township 2 South, Range 97 West, 6th P.M. in Rio Blanco County. All sixteen proposed wells would be directionally drilled into Federal minerals as follows: seven on Federal Lease COC 003453; seven on Federal Lease COC 057285; and two on Federal Lease COC 070220. The pad is accessed along an existing 5.7 mile access road from Rio Blanco County Road 85, entirely on Federal surface.</p> <p>The existing RG 41-18-297 pad is 0.78-acres and currently supports production of one existing natural gas well. The pad would be expanded to a 6.09-acre footprint to accommodate the development of the 16 proposed wells and proposed infrastructure including twenty separators, six 500bbl condensate tanks, one 500bbl produced water tank, one 80bbl blowdown tank / vent tank, three VOC combustors, and one 7,200 cubic yard drilling pit. Proposed pipelines include one 8 steel gas pipeline (approx. 1397), one 6 flexsteel water pipeline (approx. 1502) between separators, seventeen 2 steel wellhead flowlines, one 2 fuel gas line, three 2 flexpipe condensate dump lines, one 2 flexpipe produced water dump line, one 1 steel natural gas supply line, and one 4 aluminum surface line from the tank battery to ECDs. The pipeline easement would consist of a 25' permanent easement with an additional 15' wide temporary workspace, and the gas and water pipelines would be collocated in the same trench. The operator would also install five temporary surface frac lines between the RGU 23-7-297 pad and the RG 41- 18-297 pad to conduct remote well completions operations on the RGU 23-7-297 pad. The proposed pipelines and frac lines would follow existing access roads or pipeline corridors.</p> <p>CPW attended an on-site consultation on July 15, 2019 with TEP and BLM. The Federal RG 41-18-297 pad and access road fall within Mule Deer Critical Winter Range (Severe Winter Range and Winter Concentration Area) Sensitive Wildlife Habitat (SWH). Stipulations include a Timing Limitation (TL) from Dec 1 to April 30 for big game critical winter range, and a raptor survey required by BLM. CPW advised the addition of perch deterrents on the poles for the overhead powerlines proposed along BLM Road 1019 from CR 24. CPW requested wildlife-friendly fencing around reclamation areas, if they were to be fenced. Additionally, CPW advised that the project area falls within the Square S cattle grazing allotment (South Ryan pasture), and that the operator would have to give the grazing permittee 72 hours notice before commencing operations and fix any range structures (ie, fence) damaged during the project.</p> <p>On May 14, 2020, the operator contacted CPW for a pre-app review of locations included in the recently submitted Lower Wagonroad Ridge Master Development Plan (LWRMDP) to the BLM White River Field Office. The LWRMDP includes development of 51 natural gas wells on three existing well pads (RG 41-18-297 pad, RGU 23-7-297 pad and RGU 44-1-298 pad), one produced water disposal well (Federal RG 33-22-299) on the existing Federal 299-23-3 pad, installation of additional facilities on the RGU 23-6-297 pad, and construction of a new Centralized Waste Management Facility. The operator proposed to begin construction, if permitting allowed, of the RG 41-18-297 pad and RGU 23-7-297 pad in fall 2020, in order to complete construction prior to the Dec. 1- April 30 Big Game Winter Range TL for these two locations.</p> <p>The operator expects to begin drilling operations on the RG 41-18-297 pad in late April 2021, during the Big Game Winter Range TL. However, delays associated with ongoing and upcoming drilling operation may delay drilling activities on the RG 41-18-297 until later in 2021. The operator will consult with CPW and BLM 1-2 months prior to any proposed operations, including construction, drilling, or completion operations scheduled to occur during the Big Game Winter Range TL to determine if compensatory mitigation will be required to offset adverse impacts to wildlife.</p> <p>The operator requested to meet with CPW and the BLM later in 2020 once their development schedule was solidified, to review any changes to the development schedule and to determine if any additional mitigation measures may be required. The operator proposed the following planning and operational measures, included in the LWRMDP, to</p>	06/23/2020

minimize impacts to wildlife:

1. TEP will utilize the existing RGU 23-6-297 pad as a centralized produced water storage facility for produced water from the RG 41-18-297 pad and RGU 23-7-297 pad minimizing truck traffic to the well pads. Pipelines will be installed from the production facilities on the well pads, and produced water will gravity feed into the tank battery on the RGU 23-6-297 pad. Initially, TEP had planned to install permanent pumps, tanks, and additional pipelines on the RG 41-18-297 pad and RGU 23-7-297 pad to manage produced water from the proposed wells. Centralizing water storage minimizes vehicle traffic and pumping operations to a single location.

2. TEP will install temporary surface pipelines and permanent buried pipelines to transport produced water during frac operations minimizing truck traffic. A significant amount of produced water is used for completions operations. Trucking that volume of water would significantly increase vehicle traffic and would increase the potential for wildlife related traffic accidents. Pumping water via pipelines minimizes impacts to wildlife.

3. TEP evaluated multiple sites for drilling operations, and determined that impacts to wildlife habitat would be greatly reduced by utilizing existing well pads to the greatest extent possible. We will further minimize impacts to wildlife habitat by conducting completions operations remotely from a nearby existing pad locations.

4. TEP will install exclusionary devices to prevent wildlife from accessing equipment stakes, vents, and openings.

5. Proposed permanent pipelines will be collocated within existing pipeline corridors or access roads wherever possible to minimize impacts to wildlife habitat.

TEP proposed the following Wildlife Best Management Practices (BMPs) to include in all of the Form 2As for locations included in the LWRMDP:

1. To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions.

2. During post-development production operations, TEP will make best efforts to minimize operations at these locations during winter months by maximizing operations when possible between 10:00am to 3:00pm when wildlife activity is minimal.

3. TEP agrees to report any bear conflicts immediately to CPW. TEP will implement COGCC Rule 1204.a.1 by utilizing bear proof dumpsters and trash receptacles for all food related trash. All garbage and trash will be stored in enclosed bear proof trash containers and transported to an approved disposal facility periodically and upon completion of planned operations on the location.

4. TEP will preclude from the use of aggressive CPW-identified non-native grasses and shrubs in mule deer habitat and will reclaim the site using CPW-identified native shrubs, grasses, and forbs appropriate to the ecological site disturbed.

5. Certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife, will be used.

6. TEP will use certified, weed free grass hay, straw, or other mulch materials used for the reseeded and reclamation of disturbed areas.

CPW reviewed the LWRMDP, specifically the RG-41-18-297 pad, RGU 23-7-297 and Federal 299-23-3 pads. CPW expressed support for TEP using and expanding existing pad sites in lieu of constructing entirely new pads, and utilizing existing roads, pipeline corridors and infrastructure to the greatest extent possible to minimize new disturbance to wildlife habitat. CPW also expressed support for the planning and operational measures included in the LWRMDP and proposed Best Management Practices for these sites. Since the RG-41-18-297 pad is scheduled to start drilling in late April during the Big Game Winter Range Timing Limitation of Dec 1-April 30, CWP requested to meet with TEP and the BLM WRFO (as soon as feasible per COVID restrictions) to discuss potential compensatory mitigation measures if the drilling start date cant be moved to after April 30.

	<p>Per the Form 2A, TEP's Operator Proposed Wildlife BMPs for the RG-41-18-297 pad include:</p> <ol style="list-style-type: none"> <li>1. Black Bear: The operator agrees to report bear conflicts immediately to CPW staff.</li> <li>2. Black Bear: The operator will implement Rule 1204.a.1 (also see General Operating Recommendations).</li> <li>3. Deer and Elk: The operator agrees to preclude the use of aggressive CPW-identified non-native grasses and shrubs in mule deer and elk habitat restoration.</li> <li>4. Deer and Elk: To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to the posted speed restrictions.</li> <li>5. Deer and Elk: The operator agrees to use certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife. TEP will use certified weed free grass hay, straw, hay, or other mulch materials used for the reseeded and reclamation of disturbed areas.</li> <li>6. Raptors: Exclusionary devices will be installed to prevent bird and other wildlife from access equipment stacks, vents, and openings.</li> <li>7. Deer and Elk: The operator and its contractors agree to restrict well site visitations to portions of the day between 10:00 a.m. and 3:00 p.m. when possible, during winter season (Dec 1 through April 15) within CPW-identified mule deer critical winter range and elk winter concentration areas.</li> </ol> <p>Additional Operator-Proposed BMPs that will minimize impacts to wildlife include:</p> <p>(1) Planning- The development plan for the RG 41-18-297 pad was prepared to minimize surface impacts to the greatest extent possible through the development of multiple wells from one location by utilizing directional drilling technology, collocating access road and utility corridors within the same area, and through the transportation of produced water to centralized storage facilities on the RGU 23-6-297 pad, thus minimizing the surface area needed to conduct operations on the RG 41-18-297 pad location.</p> <p>(3) General Housekeeping- The well site and access road will be kept free of trash and debris at all time. Disposal of garbage and trash will occur approximately once per week during drilling and completions operations.</p> <p>Due to the fact that the operator will be completing construction activity on this site prior to Dec. 1, in addition to utilizing existing pad sites, roads and pipeline corridors and centralizing fluid management to minimize vehicle traffic and site visitation, CPW is not proposing any additional wildlife BMPs at this location. The operator will consult with CPW and BLM to discuss compensatory mitigation options if drilling operations are scheduled to occur during the Big Game Winter Range TL of Dec. 1 to April 30. CPW does not object to the proposed operations.</p> <p>Elissa Slezak, June 23, 2020</p>	
OGLA	06/17/2020 - attached revised Sensitive Area Data and Operator Objective Criteria Checklist; renamed attachments called "OTHER" to better identify the information submitted; added compensatory mitigation BMP from TEP;	06/17/2020
OGLA	06/16/2020 - completed 'Objective Criteria Review Memo'; prepared Objective Criteria Document (OCD) with the objective criteria memo, pertinent maps and attachments (Wildlife Maps, Aerial Map, Access Road and Pipeline Maps, Hydrology Map, Stormwater Control Drawings, and Interim Reclamation Plan), and portions of the current Form 2A; emailed OCD to the director in preparation for director review on 06-16-2020;	06/16/2020
OGLA	06/15/2020 - received revised Sensitive Area Data and Operator Objective Criteria Checklist; revised wildlife and operational BMPs per TEP; continued detailed technical OGLA review; prepared draft 'Objective Criteria Review Memo';	06/15/2020

OGLA	06/11/2020 - initiated OGLA review; requested revised Sensitive Area Data and Operator Objective Criteria Checklist attachments; requested construction, drilling, and completion time frames;	06/11/2020
OGLA	05/28/2020 - COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria #5.c, #6, and #12.	05/28/2020
OGLA	Passed Completeness.	05/28/2020

Total: 15 comment(s)