



Emergency Response Plan

CPX Piceance Holdings, LLC

Tepee Park Ranch

Garfield County, Colorado

PREPARED BY:

CPX Piceance Holdings, LLC

34 S. Wynden Dr., Suite 240

Houston, TX 77056

June 2022

Rev.1

1.0 INTRODUCTION

CPX Piceance Holdings, LLC (CPX) prepared an Emergency Response Plan (Plan) in February 2022 for the continued drilling and production of natural gas on Well Pad 25A on Tepee Park Ranch (TPR).

This Revision 1 to the Plan adds information for a temporary water support pad, Pad 25B.

TPR is privately owned and operated by CPX. The pads described above are located in the SW ¼ SE ¼ Section 25, Township 7 South, Range 94 West in Garfield County. The pad coordinates are listed below:

	Well Pad 25A	Temporary Water Support Pad 25B
Lat	39.404522	39.404901
Lon	-107.832789	-107.831352

Well Pad 25A is an existing and operating natural gas well pad. At full build out, it will contain a total of 37 wells: two operating natural gas wells, an additional 34 natural gas wells, and a Class II Underground Injection Control (UIC) well for disposal of water produced on TPR.

Two types of water are planned for storage on Temporary Water Support Pad 25B: (1) recycled produced water to use during well completions; and (2) water from well completions to be used for future well completions or to be stored before disposal in the Class II UIC well on Pad 25A. Water from well completions will pass through a separator and tanks with vapor control on Pad 25A before routing to Pad 25B.

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
Garfield County Sheriff's Office 107 8 th St., Glenwood Springs, CO 81601	Chris Bornholdt Emergency Operations Manager	(970) 945-0453 cbornholdt@garcosheriff.com

2. DATE THE PLAN WAS FINALIZED AND APPROVED

This Emergency Response Plan was coordinated with the local response agency. Appendix A demonstrates the coordination activity and local response.

3. DIRECTIONS TO THE LOCATION

Directions to TPR Pads 25A and 25B from 7th St South and Taugenbaugh Blvd. in Rifle:

West on 7th St. South

L on Garden Lane

R on CR 320

At the fork, L on CR 317 for approximately 5.5 miles

Continue south on FS 824 mile for approximately 2.75 miles to the TPR gate

Continue south on private TPR road for approximately 0.6 mile to Pad 25B

Continue an additional approximately 0.2 mile to Well Pad 25A on the west side of the road

4. INGRESS AND EGRESS INFORMATION

Ingress

TPR is accessed through a secured gate at the southern terminus of FS 824.

Gate access is provided by CPX Operations Manager, Bryan Clark, whose contact information is shown in Table 4.

Egress

The private TPR road is approximately 20' wide. Well Pad 25A is approximately 2.6 acres. Pad 25B is approximately 1.8 acres.

There is sufficient turn-around for emergency vehicles and equipment.

5. LEGAL DESCRIPTION

Table 3. Legal Description

Qtr Qtr	SW ¼ SE ¼	
Section	25	
Township	7 South	
Range	94 West	
County	Garfield	
	25A	25B
Lat	39.404522	39.404901
Lon	-107.832789	-107.831352

6. OPERATOR AND STAFF EMERGENCY CONTACT INFORMATION

Table 4. Operator Contact Information

Operator and Staff	Contact
Principal	Nick Kurtenbach (720) 233-8275 nick@cpxpiceance.com
Operations Manager	Bryan Clark (970) 987-2220 bryan@cpxpiceance.com

7. MUTUAL AID AGENCY

Colorado River Fire Rescue – Station 41

1850 Railroad Ave., Rifle, CO 81650

Orrin Moon, Fire Marshall

orrin.moon@crfr.us

Office (970) 379-2932 (Cell)

8. STAFFING OF LOCAL AND MUTUAL AID AGENCIES

Colorado River Fire Rescue is a fire protection district. It is staffed by a combination of approximately 41 full-time, 9 part-time, and 13 volunteer staff. Under normal conditions, the district maintains three staffed and two unstaffed stations. One additional station is staffed with interagency firefighters. After a failed mill levy in 2020, the district closed Station 43 in South Rifle. The district continues to maintain Station 41 in North Rifle.

The Garfield County Sheriff's Office has approximately 144 staff. The Emergency Management Commander reports that the Sheriff and is assigned a sergeant to support staffing for emergency response.

9. SITE SETTING

TPR and the surrounding area are shown in Appendix B. The pads are located on private land at approximately 9,100' in elevation. Well Pad 25A was constructed in 2008 and is approximately 2.6 acres. Pad 25B is forecasted

to be constructed in 2022 and will be approximately 1.8 acres. The pad surfaces are bare ground with no vegetation. They are surrounded by cut and fill dirt work. The surrounding area is aspen woodlands. The border with U.S. Forest Service land is approximately 2,000' north of the pads. Beaver Creek, a perennial stream, runs through TPR and is approximately 930' to 1,440' downgradient.

The nearest residence is greater than 1 mile northwest. The only structure within a 1/2-mile radius of the well pad is an unoccupied, unimproved cabin on TPR used to store outdoor gear, tables, tools, and other non-hazardous supplies.

10. DETAILED LAYOUT

Detailed layouts of the pads are shown in Appendix C. At full build out, Well Pad 25A will have an anticipated 9 quad separators, 7 produced water tanks, and 1 condensate tank inside of lined steel secondary containment. The pad will have an enclosed combustor. Pad 25B will have an anticipate 10 to 15 10,000-bbl or 15,000-bbl water tanks inside of containment and potential for a gunbarrel tank for additional capture of any residual condensate. Pad 25B will be decommissioned when well completions are finished on TPR.

Three existing buried flowlines tie into the northwest side of Well Pad 25A, cross TPR, and continue in a buried flowline trench adjacent to FS 824 to CPX's production pad on private property near the intersection of FS 824 and CR 317. The flowlines transport natural gas, condensate, and produced water or freshwater.

11. EQUIPMENT AND STORED MATERIALS

New well drilling on Well Pad 25A will require the equipment and stored material listed below. The equipment is shown in Appendix C. The equipment will be removed when drilling and well completion is finished.

- Company man housing
- Directional house
- Mud engineering
- Tool pusher shed
- Change house
- Utility Shed
- Air handler
- Office
- Water tanks
- Flare stack
- Gel tank and bar tank
- Drill cuttings trench
- Drill rig
- Generator house
- Diesel tank
- Pump skid
- Mixing skid
- Process skid
- Suction tank
- Shale shaker
- Mud tanks
- Totes of drilling support chemicals

During production, equipment and material stored on the Well Pad are anticipated to include the following:

- 7 450-bbl produced water tanks
- 1 450-bbl condensate tank
- 8 quad separators
- Combustor
- Injection pump for corrosion control chemical injection

A Spill Prevention Control and Countermeasure (SPCC) Plan will be updated and maintained for the location.

Temporary Water Support Pad 25B will require the equipment listed below and shown in Appendix C. The pad will be decommissioned when well completions are finished on TPR.

10 – 15 Modular large volume tanks

110-HP Transfer pump

2 5,000-kW Generators

12. SENSITIVE AREAS

There are no sensitive areas affected by the pads. Beaver Creek is located approximately 930' to 1,440' downgradient. Groundwater in this area is an estimated 40' to 80' deep. There is no residential development. The nearest residence is greater than 1 mile northwest.

13. POTENTIAL IMPACTS, PREVENTION, AND MITIGATION

Potential impacts include:

- Storm damage
- Lightening
- Wildfire
- Spill or release
- Equipment failure
- Motor vehicle or on-site accident

Personnel will be on site continuously during well drilling and completions. During production, CPX personnel will be on site daily for operations and maintenance. The field staff live within 15 minutes of TPR, which facilitates a consistent on-site presence to detect a problem at the location. Staff will monitor for storm-related damages, equipment failure and maintenance needs, and accidental spills or releases.

Tanks are 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. The SPCC Plan for the location describes additional controls and response.

Material used on a 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. Pads 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 and overturned vehicles.

14. RESPONSE EQUIPMENT

CPX maintains spill response material to respond to a spill or accident, consisting of booms and absorbents. The response materials will support cleanup of small leaks or spills, such as produced water, oil, lubricants, or incidental fuel leaks. The drum where response material is stored will be inspected a minimum of annually, and material will be replenished, if needed.

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

In the event of a significant water loss on Pad 25B, water will be contained inside of secondary containment and will flow to a 5-foot by 5-foot steel sump installed at grade on the pad. If the capacity of the sump is exceeded, a 5-hp pump will be used to pump water to an emergency standby tank on CPX's Pad 2 in Section 13, Township 7 South, Range 94 West, at the intersection of FS 824 and CR 317. Water will flow to Pad 2 using CPX's existing bidirectional 8" water flowline. Residual water, if any, will be removed using a vacuum truck. The emergency standby tank on Pad 2 will be 10,000 or 15,000 bbl.

15. HEALTH AND SAFETY ACTION LEVELS

Personnel will be on site continuously during well drilling and completions. Their presence will provide continuous communication about site conditions and site safety. During production CPX personnel will be on site daily for operations and maintenance.

During completions, the operator will monitor tank and flowline integrity, volumes, and secondary containment for evidence of leaks or spills. During production, the operator will observe secondary containment, the separators, and wellhead areas. The operator will monitor for pressure drops in pipelines that could indicate an issue with equipment or valves.

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, Well Pad 25A will be used for a staging area. If Well Pad 25A is not available, nearby Well Pad 36A will be used for staging. Well Pad 36A is undeveloped and does not contain producing wells at this time.

16. TRAINING COORDINATED WITH LOCAL RESPONDERS

In the event of an emergency requiring first responders, a unified command will be established between the CPX appointed representative on location and first responders from Colorado River Fire Rescue. 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 Colorado River Fire Rescue 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 CPX 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 Grand River Hospital in Rifle, CO. It is approximately 12 miles from Well Pad 25A.

NEAREST MEDICAL FACILITY

Grand River Hospital

501 Airport Road
Rifle, CO 81650
(970) 625-1510
24-hour Emergency Room

Directions from TPR

- North on TPR road to FS 824
- North on FS to CR 317
- L on CR 317 for approximately 5.5 miles
- R at fork with CR 320
- L on Garden Lane
- R on 7th St. South
- East on 7th St. South
- Stay straight at the traffic circle
- 7th St. South becomes Airport Rd.
- In 1/3 mile, R into the hospital entrance

Appendices

- Appendix A Demonstration of Local Response Agency Coordination
- Appendix B Location Drawing
- Appendix C Layout Drawings

Appendix A

Demonstration of Local Response Agency Coordination

Archived: Tuesday, June 21, 2022 8:32:32 AM
From: [Chris Bornholdt](#)
Sent: Tuesday, June 21, 2022 8:11:36 AM
To: gwen.brodsky@aota.tech
Subject: RE: CPX Piceance Holdings Emergency Response Plan
Sensitivity: Normal

Received

From: gwen.brodsky@aota.tech <gwen.brodsky@aota.tech>
Sent: Thursday, June 16, 2022 2:59 PM
To: [Chris Bornholdt](mailto:cbornholdt@garcosheriff.com) <cbornholdt@garcosheriff.com>
Cc: [Nick Kurtenbach](mailto:nick@cpxpiceance.com) <nick@cpxpiceance.com>; 'Bryan Clark' <bryan@cpxpiceance.com>
Subject: CPX Piceance Holdings Emergency Response Plan

Commander Bornholdt,

This email provides the Emergency Response Plan for CPX Piceance Holdings, LLC. It's updated from the version you reviewed in March 2022. Your previous review for CPX's Well Pad 25A is documented in Appendix A of the Plan. The current update describes a new proposed *Temporary Water Support Pad*, Pad 25B. CPX plans to apply for a Colorado Oil and Gas Conservation Commission permit for Pad 25B during Q3 2022. The Emergency Response Plan is a requirement under state rules administered by COGCC. The Emergency Response Plan is cumulative. It describes the original Well Pad 25A and this addition of Pad 25B. Pad 25B will be located on CPX's privately owned Tepee Park Ranch, south of Rifle.

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

Thank you, and please don't hesitate to let me know if you have questions that we can help with.

Regards,
Gwen

[Gwen Brodsky](#) | Principal Planner
Cell (303) 818-4462
gwen.brodsky@aota.tech

Aota Technical, LLC | Denver, CO
aota.tech

----- Forwarded message -----

From: **Chris Bornholdt** <cbornholdt@garcosheriff.com>
Date: Thu, Mar 24, 2022 at 11:28 AM
Subject: Tepee Park Ranch Emergency Response Plan
To: bryan@cpxpiceance.com <bryan@cpxpiceance.com>

Hello,

Sorry for the delay in getting back to you on this, not sure where it ended up. I reviewed your plan and approve it as the LEPC chair. Thanks for your hard work and making sure the proper channels are followed.

Thanks Again



Commander Chris Bornholdt

Emergency Operations

Garfield County Sheriff's Office

107 8th Street

Glenwood Springs, CO 81601

1-970-945-0453 x 1012

cbornholdt@garcosheriff.com

Archived: Tuesday, February 8, 2022 10:00:44 AM

From: gwen.brodsky@aota.tech

Sent: Tuesday, February 8, 2022 8:57:01 AM

To: cbornholdt@garcosheriff.com

Cc: Nick Kurtenbach; 'Bryan Clark'

Subject: Emergency Response Plan - CPX Piceance Holdings

Sensitivity: Normal

Attachments:

[Emergency Response Plan_CPX Piceance Holdings 0222.pdf](#) 

Mr. Bornholdt,

On behalf of CPX Piceance Holdings, LLC, this email provides an Emergency Response Plan for the continued development of natural gas wells that CPX proposes to develop on CPX's privately owned Tepee Park Ranch, south of Rifle. I believe you have previously reviewed similar plans submitted by other operations. The Emergency Response Plan is a permit requirement under state rules administered by the Colorado Oil and Gas Conservation Commission (COGCC). CPX plans to apply 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 us to demonstrate to the COGCC our coordination with the local emergency response agency.

Thank you, and please don't hesitate to let me know if you have questions that we can help with.

Regards,

Gwen

Gwen Brodsky | Principal Planner

Cell (303) 818-4462

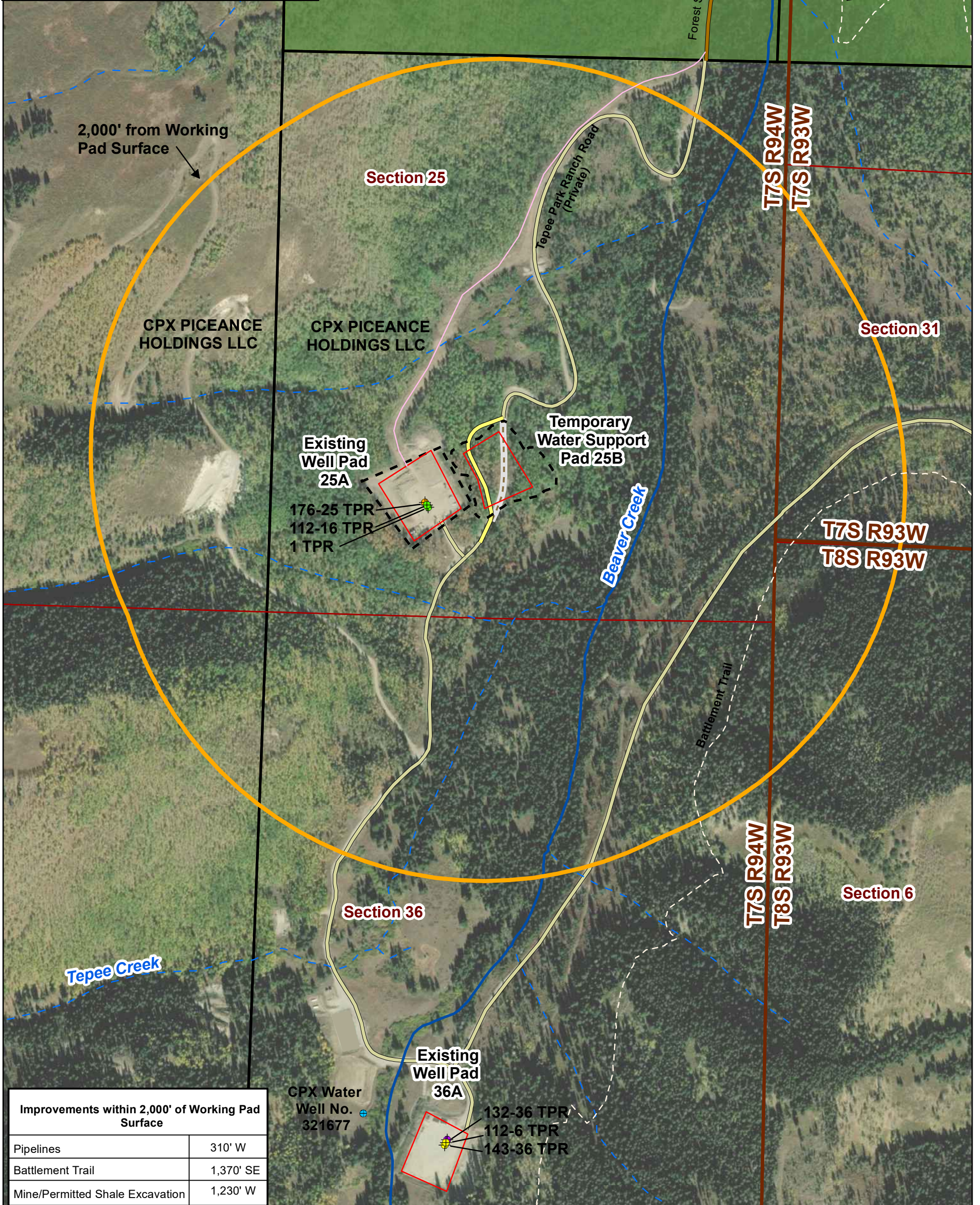
gwen.brodsky@aota.tech

Aota Technical, LLC | Denver, CO

aota.tech

Appendix B

Location Drawing

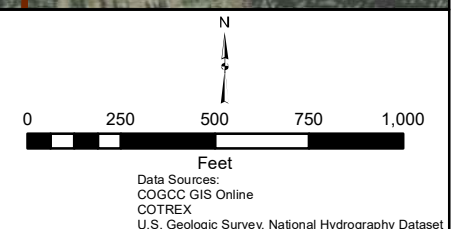


Improvements within 2,000' of Working Pad Surface	
Pipelines	310' W
Battlement Trail	1,370' SE
Mine/Permitted Shale Excavation	1,230' W

Aota Technical, LLC
CPX Piceance Holdings, LLC
Tepee Park Ranch
Temporary Water Support Pad 25B
Location Drawing
 Garfield County
 SW1/4SE1/4 Sec. 25, T7S R94W, 6th P.M.
 Date: 6/3/22
 Figure No.: **Figure 1**

Legend

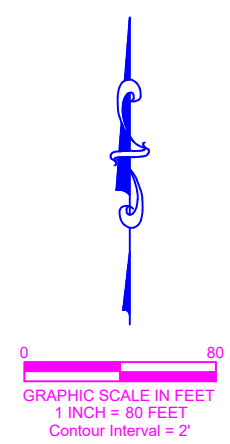
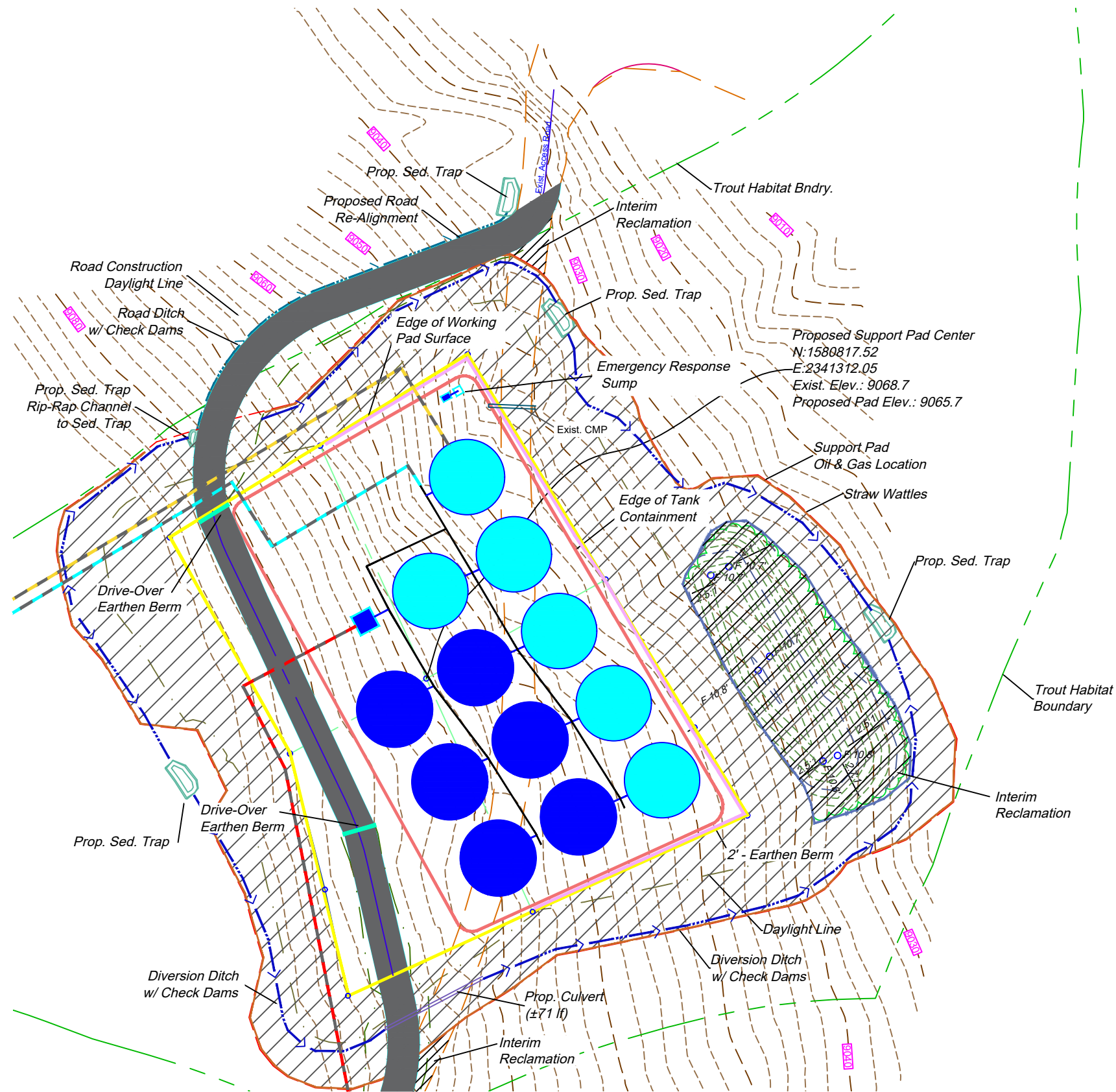
Oil & Gas Wells	Working Pad Surface	Forest Service Road
Drilled and Producing	2,000 from Working Pad Surface	Private Road
Drilled	Trail	Private Road Reroute and Access
Drilled/Uncompleted "DUC"	Off-Location Flowlines	Reclaimed Private Road
Well Permitted	Forest Service Jurisdiction	Perennial Stream
Water Well	Parcels	Intermittent Stream



Appendix C

Layout Drawings

PRELIMINARY



- LEGEND -

- 10K bbl WATER STORAGE TANK (50ft DIAMETER)
- 15K bbl HARPOON TANK (55ft DIAMETER)
- EDGE OF WORKING PAD SURFACE
- PROPOSED ROAD
- SUPPORT PAD OIL & GAS LOCATION
- DRIVE OVER BERM
- 2' MIN EARTH BERM
- DIVERSION DITCH
- STRAW WATTLES
- WATER FROM WELL COMPLETIONS
- WATER TRANSFER LINE TO REMOTE FRAC PAD
- WATER TRANSFER LINE FROM 8" FLEX STEEL
- 4' SECONDARY CONTAINMENT (MUSCLE WALL)
- 12" MANIFOLD (STEEL)
- 4" RUBBER HOSE
- PUMP
- EMERGENCY FLUID SUMP (STEEL)
- HYDROMULCH /SEED

Notes:

1. Water storage will total approximately 150,000 bbls in modular large volume tanks (MLVTs). Tank procurement is dependent on availability. Tanks are forecasted to be either 10,000-bbl or 15,000-bbl in size, or approximately 10 to 15 tanks.
2. Secondary Containment Capacity: +150% total capacity.
3. Pad 25B will be used only for temporary water storage. It will not contain wells.
4. Pad located on private surface. Gate locked at main entrance.

Temporary Water Support Pad 25B
Facility Layout

	DATE: 06/27/22		
	PROJECT: CPX		
	DESIGNED BY: JAS		
	DRAWN BY: TPP		