

COGCC Water Plan – Front Range #1

RULE 304.C. (18)

Plan Purpose

Front Range Energy (FRE) is a local Windsor, Colorado owned manufacturer of fuel ethanol and other high value co-products. FRE is proud to produce a renewable fuel, which displaces foreign sources of energy while enhancing our national security, cleans up tailpipe emissions, creates American and Colorado jobs, and supports our local, regional, and national economies.

To meet decarbonization targets and to continue to produce clean burning biofuels, Front Range Energy created Carbon Storage Solutions, LLC (CSS) --a wholly owned subsidiary of FRE-- to manage carbon dioxide emissions from the facility. To that end, CSS seeks to develop a project that will capture the CO₂ emissions derived from the ethanol fermentation process and sequester the CO₂ proximal to the FRE facility, creating a net-negative transportation fuel. As part of the Project feasibility, CSS will need to drill and test a single stratigraphic well to examine the feasibility of the subsurface formations for the geologic storage of carbon dioxide.

CSS recognizes the need for developing a responsible water allocation plan as it pertains to Oil and Gas operations. The attached site-specific plan has been prepared in accordance with the Colorado Oil and Gas Conservation Commission (COGCC or Commission) Rule 304.c.(18) for a stratigraphic test well located in Weld County, Colorado.

Operating Requirements

As of January 15, 2021 all new location permits must include a Water Plan. The water plan must identify the planned source of water to be utilized for drilling and completion operations including:

- A. The planned source and volume of all surface water and Groundwater to be used and the coordinates of the planned source of water;
- B. The seller's name and address if water is to be purchased;
- C. If recycled or reused water is anticipated to be used, a description of the source of that water, background concentrations of chemicals listed in Table 437-1, anticipated method of transporting the water, and anticipated volumes to be used in addition to the reuse and recycling plan requirements of Rule 905.a.(3); and
- D. If freshwater is anticipated to be used, a description of why the Operator does not intend to use recycled or reused water.

The operator will maintain a copy of this plan on location throughout the duration of the site drilling and completion operations.

Resources Impacted

CSS' stratigraphic test well will include one single-well pad location. The proposed well pad is located in Weld County, CO. Site-specific information detailing the water plan is included in the form below.

WATER PLAN INFORMATION

FRONT RANGE #1 STRATIGRAPHIC TEST WELL



Project Name:	Front Range #1	Region:	DJ Basin
Report Date:	June 3, 2022	Field Name:	N/A
County, State:	Weld County, Colorado	Proposed Start Date:	4th Quarter 2022
Location (Township):	T6N, R67W, S26	Project Coordinates:	40°27'17.87" (40.454964°) 104°51'35.14" (104.859761°)

A. Planned Source(s) General Information

Source Name	Drilling (bbls)	Completions (bbls)	Source Type	Coordinates
Front Range Energy Process Water	2,500	N/A	Ground Water	40°27'17.87" 104°51'35.14"
Totals	2,500	N/A		2,500

B. Planned Source(s) Seller Information

Source Name	Sellers Name	Address
N/A	N/A	N/A

C. Recycle/Reuse Plan

Source Name	Description	Concentration List	Transport Method
N/A	N/A	N/A	N/A

D. Freshwater Justification

CSS intends to use freshwater for the 2,500 bbls of water needed to drill the stratigraphic test well. Water will be sourced from permitted well water from Front Range Energy's water rights decreed in Case No. 05CW226, Water Division No. 1.

The use of recycled water from oil and gas wells is not proposed given that CSS would have to truck produced water from an offsite oil and gas location, which would result unnecessary truck traffic and environmental risk.

4 Literature Cited

Colorado Oil and Gas Conservation Commission. 2021. Permitting Process 300 Series.
Colorado Department of Natural Resources.