
DUST MITIGATION PLAN

BNL | ENTERPRISE

BBB 33 SESE 2860

Sec. 33 T28S R60W (SE/4 SE/4)

Las Animas County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application
and consistent with the requirements of Rule 427.a.

May 4, 2022

BNL (Enterprise) Inc. Las Animas County, Colorado

Dust Mitigation Plan

Project Summary:

BNL (Enterprise) Inc.'s ("BNL's") proposed BBB 33 SESE 2860 "Location" is in Sec. 33 T28S R60W in Las Animas County, Colorado. BNL plans to drill and test one *helium* well. If the well produces commercial quantities of helium the well will be shut-in for a period of six to nine months until helium production/processing facilities can be constructed at an offsite facility location. The helium facility will be on lands outside of the Oil and Gas Development Plan. The facility will be constructed on private surface. The landowner agreement provides for the installation of the gas gathering line. The production/processing facilities will not require an Oil and Gas Development Plan. BNL will use a 130-mil rig liner during the drilling and testing of the well. The rig liner will be placed under critical wellsite components including the rig and any diesel motors. The entire location will not be lined. Minimal soil will be disturbed during this time. The well will be drilled vertically to no more than 2,500 feet and will not require hydraulic fracturing. The proposed location is fee surface and fee minerals with a total pad disturbance of ± 1.2 acres. During the drilling and testing phase, the existing access road will be minimally upgraded to allow for construction and, if needed, emergency vehicles. If the well proves to be of commercial quantities, the road will be crowned and ditched, in consultation with the private surface owner and any other owners along the access route. The graded site elevation is expected to be approximately 5,424'. No federal lands or minerals are involved in this project. All operations would be conducted in compliance with all federal, state, and local applicable laws, rules, and regulations.

Plan

Project Overview:

BNL's Dust Mitigation Plan is intended to facilitate compliance with the applicable regulations of the Colorado Oil and Gas Conservation Commission, the Colorado Department of Public Health and Environment and Las Animas County.

BNL's development of the BBB 33 SESE 2860 Location requires earth disturbing activities and travel on unpaved roads which has the potential to produce fugitive dust emissions.

Dust associated with the Location activities and traffic on roads will be minimized throughout all phases such that there are minimal visible dust emissions from the Location or associated roads to the maximum extent practicable given wind and other weather conditions.

No proppant will be used in completion operations.

Any chemical application will have Safety Data Sheets on location.

Compliance with Rule 427.a.

1. Wellpad soil types:

WV – Almagre-Villedry complex, 1 to 4 percent slopes

Access Road soil types:

TsD – Travessilla sandy loam, 1 to 9 percent slopes

WV – Almagre-Villedry complex, 1 to 4 percent slopes

Flowline soil types:

TsD – Travessilla sandy loam, 1 to 9 percent slopes

WV – Almagre-Villedry complex, 1 to 4 percent slopes

2. Proposed vehicle speed limit: 20 MPH or less on roads; 5 MPH or less on the Location.

3. Total disturbed area: 10.6 acres

- Wellpad: 1.2 acres
- Access Road: 2.1 acres (a portion of the flowlines will be installed in the access road ROW and is included in this disturbance calculation.)
- Flowline to the Central Delivery Point: 7.3 acres (disturbance of flowlines not utilizing common access road construction.)
- **Total Acres of disturbance: 10.6 acres**

4. Access roads will not be paved. During the drilling and testing phase, the existing access road will be minimally upgraded to allow for construction and if needed emergency vehicles. If the well proves to be commercial, road will be crowned (with a minimum of 4 inches of gravel) and ditched, as agreed to by the private surface owner. Road surfacing material will consist of limestone, scoria or river rock or as agreed upon by the private surface owner and will be sourced as locally as possible to minimize travel distance.

5. Number of truck trips during the Construction, Drilling, Completion and Production stages:

Phase of Development	Monthly Truck Trips	Yearly Truck Trips
Construction (Wellpad & Access)	96	96
Drilling/Testing/Completion	104	104
Production/Daily Operations	30	365
Total Truck Trips	230	565

Traffic counts are approximate, based on round trips, and may vary due to circumstances.

6. Plan for Suppressing Fugitive Dust Caused by Wind:

- Stop work orders will be issued during high wind conditions, when possible, with contiguous activities on location (sustained winds of 25 MPH or greater).
- Regular road maintenance will be implemented to mitigate fugitive dust.
- Avoid unnecessary work on dust generating on high wind days.
- Natural or artificial windbreaks may be utilized as appropriate.
- Utilize gravel in high wind areas on specific portions of roads and wellpads.

7. Best Management Practices:

- BNL will use a 130-mil rig liner during the drilling and testing of the well. The rig liner will be placed under critical wellsite components including the rig and any diesel motors. The entire location will not be lined.
- The wellpad will be constructed to a minimum size to accommodate all equipment but allowing for maximum safety precautions. The rig mat will eliminate fugitive dust from the wellpad. See attached product specs.
- Utilize existing vegetation, trees slash or brush piles to cover disturbed areas not used for vehicle traffic.
- Application of fresh water during dry season.
- Applications of approved chemicals may be applied to areas not needed for traffic to form a less erodible soil.
- Operations will be confined to the wellpad working surface.
- Continuous monitoring of disturbed areas to evaluate additional BMPs needed.
- Fresh water application to disturbed areas during construction.
- Fresh water or magnesium chloride application to graveled surfaced of the Location and associated roads.
- Speed limit signs will be posted per surface owner agreement.
- Contractors will be notified of speed limits if no signs are posted.
- Regular road maintenance such as grading and adding additional gravel as needed.

Las Animas County Area, Colorado, Parts of Huerfano and Las Animas Counties

TsD—Travessilla sandy loam, 1 to 9 percent slopes

Map Unit Setting

National map unit symbol: 2q08y
Elevation: 4,700 to 6,500 feet
Mean annual precipitation: 11 to 16 inches
Mean annual air temperature: 48 to 54 degrees F
Frost-free period: 130 to 170 days
Farmland classification: Not prime farmland

Map Unit Composition

Travessilla and similar soils: 75 percent
Minor components: 25 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Travessilla

Setting

Landform: Scarps
Landform position (two-dimensional): Shoulder, summit
Landform position (three-dimensional): Crest
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Slope alluvium and/or residuum weathered from sandstone

Typical profile

A - 0 to 5 inches: sandy loam
AC - 5 to 11 inches: sandy loam
Bk - 11 to 14 inches: sandy loam
R - 14 to 79 inches: bedrock

Properties and qualities

Slope: 1 to 9 percent
Depth to restrictive feature: 10 to 20 inches to lithic bedrock
Drainage class: Well drained
Capacity of the most limiting layer to transmit water (Ksat): Moderately low to moderately high (0.06 to 0.20 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 15 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water capacity: Very low (about 1.6 inches)

Interpretive groups

Land capability classification (irrigated): 6s
Land capability classification (nonirrigated): 6s
Hydrologic Soil Group: D
Ecological site: R069XY053CO - Sandstone Breaks LRU's A & B
Forage suitability group: Needs Field Review (G069XW050CO)
Other vegetative classification: Needs Field Review (G069XW050CO), Sandstone Breaks #53 (069XY053CO_2)
Hydric soil rating: No

Minor Components

Rock outcrop

Percent of map unit: 10 percent
Landform: Scarps
Hydric soil rating: No

Olney, bedrock substratum

Percent of map unit: 4 percent
Landform: Ridges
Landform position (three-dimensional): Interfluve, side slope
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R069XY026CO - Sandy Plains LRU's A & B
Other vegetative classification: Sandy Plains (069XY026CO_1)
Hydric soil rating: No

Villedry

Percent of map unit: 4 percent
Landform: Interfluves, plains
Landform position (two-dimensional): Shoulder, summit, backslope
Landform position (three-dimensional): Rise
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R069XY006CO - Loamy Plains, LRU's A & B 10-14 Inches, P.Z.
Other vegetative classification: Loamy Plains #6 (069XY006CO_2)
Hydric soil rating: No

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Percent of map unit: 4 percent
Landform: Plains
Landform position (three-dimensional): Talf
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R069XY006CO - Loamy Plains, LRU's A & B 10-14 Inches, P.Z.
Hydric soil rating: No

Villegreen

Percent of map unit: 3 percent
Landform: Plains
Landform position (two-dimensional): Backslope, shoulder

Landform position (three-dimensional): Rise
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R067BY002CO - Loamy Plains
Other vegetative classification: Loamy Plains #2 (067XY002CO_2)
Hydric soil rating: No

Data Source Information

Soil Survey Area: Las Animas County Area, Colorado, Parts of Huerfano and Las Animas Counties
Survey Area Data: Version 23, Jun 5, 2020

Las Animas County Area, Colorado, Parts of Huerfano and Las Animas Counties

WV—Almagre-Villedry complex, 1 to 4 percent slopes

Map Unit Setting

National map unit symbol: 2rgqf
Elevation: 4,500 to 6,500 feet
Mean annual precipitation: 12 to 14 inches
Mean annual air temperature: 48 to 54 degrees F
Frost-free period: 125 to 170 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Almagre and similar soils: 47 percent
Villedry and similar soils: 35 percent
Minor components: 18 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Almagre

Setting

Landform: Interfluves
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Loess over residuum weathered from sandstone

Typical profile

A - 0 to 5 inches: silt loam
BA - 5 to 9 inches: silt loam
Bt - 9 to 23 inches: silty clay loam
Btk - 23 to 30 inches: silty clay loam
Bk1 - 30 to 40 inches: silt loam
Bk2 - 40 to 50 inches: loam
R - 50 to 79 inches: bedrock

Properties and qualities

Slope: 1 to 4 percent
Depth to restrictive feature: 40 to 59 inches to lithic bedrock
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately low to moderately high (0.06 to 0.20 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 40 percent
Gypsum, maximum content: 4 percent

Maximum salinity: Nonsaline to slightly saline (1.0 to 4.0 mmhos/cm)
Sodium adsorption ratio, maximum: 6.0
Available water supply, 0 to 60 inches: High (about 9.2 inches)

Interpretive groups

Land capability classification (irrigated): 3e
Land capability classification (nonirrigated): 4c
Hydrologic Soil Group: C
Ecological site: R069XY006CO - Loamy Plains, LRU's A and B
10-14 Inches, P.Z.
Forage suitability group: Loamy (G069XW017CO)
Other vegetative classification: Loamy Plains #6 (069XY006CO_2), Loamy (G069XW017CO)
Hydric soil rating: No

Description of Villedry

Setting

Landform: Interfluves
Landform position (two-dimensional): Shoulder, backslope
Landform position (three-dimensional): Side slope
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Loess over residuum weathered from sandstone

Typical profile

A - 0 to 4 inches: silt loam
BA - 4 to 7 inches: silt loam
Bt - 7 to 15 inches: silty clay loam
Btk - 15 to 25 inches: silty clay loam
Bk1 - 25 to 33 inches: clay loam
2Bk2 - 33 to 38 inches: gravelly loam
R - 38 to 70 inches: bedrock

Properties and qualities

Slope: 1 to 4 percent
Depth to restrictive feature: 20 to 39 inches to lithic bedrock
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately high (0.00 to 0.20 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 40 percent
Gypsum, maximum content: 2 percent
Maximum salinity: Nonsaline to very slightly saline (1.0 to 3.0 mmhos/cm)
Sodium adsorption ratio, maximum: 5.0
Available water supply, 0 to 60 inches: Moderate (about 6.6 inches)

Interpretive groups

Land capability classification (irrigated): 3e
Land capability classification (nonirrigated): 4c
Hydrologic Soil Group: C
Ecological site: R069XY006CO - Loamy Plains, LRU's A and B
10-14 Inches, P.Z.
Forage suitability group: Loamy (G069XW017CO)
Other vegetative classification: Loamy Plains #6
(069XY006CO_2), Loamy (G069XW017CO)
Hydric soil rating: No

Minor Components

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Percent of map unit: 10 percent
Landform: Interfluves
Landform position (two-dimensional): Summit
Landform position (three-dimensional): Interfluve
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R069XY006CO - Loamy Plains, LRU's A and B
10-14 Inches, P.Z.
Other vegetative classification: Loamy Plains #6 (069XY006CO_2),
Loamy (G069XW017CO)
Hydric soil rating: No

Travessilla

Percent of map unit: 6 percent
Landform: Scarps
Landform position (two-dimensional): Summit, shoulder
Landform position (three-dimensional): Crest
Down-slope shape: Convex
Across-slope shape: Convex
Ecological site: R069XY053CO - Sandstone Breaks LRU's A and B
Other vegetative classification: Needs Field Review
(G069XW050CO), Sandstone Breaks #53 (069XY053CO_2)
Hydric soil rating: No

Rock outcrop

Percent of map unit: 2 percent
Landform: Scarps
Hydric soil rating: No

Data Source Information

Soil Survey Area: Las Animas County Area, Colorado, Parts of Huerfano and Las Animas Counties
Survey Area Data: Version 24, Aug 31, 2021

PIG Well Pad Liner — 130 mil

Product Information:

Cover your drill site with this ultra-durable, composite liner to protect workers and the environment.

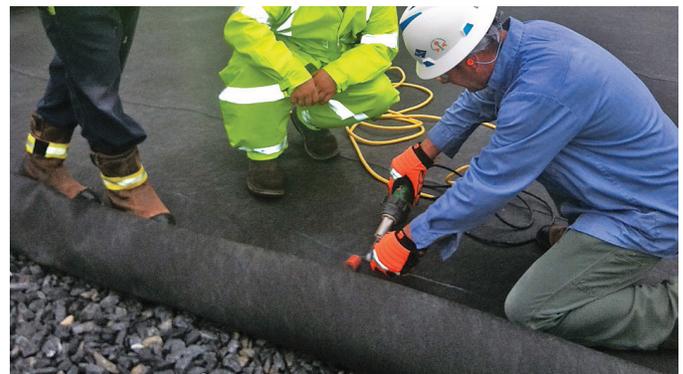
- Goes down over gravel subbase as a single layer — eliminates multiple-layer installation
- Polypropylene composite consists of three barrier films sandwiched by two layers of needle-punched geotextile with heat-fused surfaces
- Offers 3X more tear resistance and 5X more puncture resistance than standard 30-mil HDPE liners
- High-traction surface minimizes slip-and-fall injuries in wet or dry conditions
- Versatile liner can be used to create secondary containment structures on-site for frac tanks, cylindrical tanks and drill cuttings
- Welds easily for liquidtight installation
- Won't stretch or crack like HDPE
- Patent No. 9,517,596

PIG® Well Pad Liner – 130 mil			
Item #	Master Roll Approx. Dimensions	Approx. Weight	Color
MAT7000	18'W x 450'L	1,615 lbs.	Dark Gray
MAT7010	6'W x 920'L	1,085 lbs.	Dark Gray

Always in stock. 24/7 customer service. Contact your New Pig Energy sales representative for pricing details.

**Need a custom solution for your drilling operation?
Call the New Pig Energy secondary containment
experts at 1-855-PIG-LINER (744-5463).**

See back for additional product specifications.



New Pig Energy

*Secondary Containment
from the Leak & Spill Experts.®*

Phone: 1-855-PIG-LINER

Email: pigliner@newpigenergy.com

Online: newpigenergy.com

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PIG Well Pad Liner — 130 mil

Product Specifications:

	MAT7000	MAT7010
Composition:	Polypropylene	Polypropylene
Color:	Dark Gray	Dark Gray
UV Resistant:	Yes	Yes
Master Roll Width:	18' (5.5 m)	6' (1.8 m)
Thickness:	130 mil	130 mil
Approximate Roll Length:	450' (137.2 m)	920' (280.4 m)
Approximate Roll Weight:	1,615 lbs. (732.6 kg)	1,085 lbs. (492.1 kg)
Core Dia.:	4" (10.2 cm)	3" (7.6 cm)
Recyclable:	Yes	Yes

Testing Information:

MATERIAL	THICKNESS	TENSILE PROPERTIES (MAX STRENGTH)		PUNCTURE RESISTANCE	TEAR RESISTANCE	
		A-Break lb/in-width	B-Break lb/in-width		A	B
PIG Well Pad Liner – 130 mil	ASTM D 5994	ASTM D 6693/GRI, 2 ipm rate		ASTM D 4833	ASTM D 1004 (lbs.)	
	Mils			(lbs.)		
	168	159	112	314	81	67

Top Side Absorbency: Water = 3.31 gal / 100 sq ft; Oil = 3.42 gal / 100 sq ft

Permittivity (ASTM D 4491) = 0

Calculated Darcy Coefficient of Permeability = 0



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