

NueVida Resources, LLC's Dust Mitigation Plan

For the
Ardourel 33081718 Pad

October 2022

Prepared for:



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1 INTRODUCTION

NueVida Resources, LLC (NueVida) is providing this Dust Mitigation Plan (Plan) to the Colorado Oil and Gas Conservation Commission (COGCC) and Colorado Parks and Wildlife (CPW), and also to the La Plata County Planning Department, the La Plata County Planning Commission, and the La Plata County Board of County Commissioners (the last three individually or collectively as appropriate to their roles, LPC) in compliance with requirements under COGCC's Rule 304.c.(5) and Rule 427, as well as LPC's Land Use Code (LUC) Section 90-124.III.H. related to dust mitigation measures for minor oil and gas facilities. The purpose of this Plan is to address the requirements and mitigate concerns regarding impacts from dust generated by the proposed project.

NueVida proposes to develop the Ardourel 33081718 Pad (Project), a natural gas extraction, and transportation system within 34.51 acres of total disturbance. NueVida plans to initially drill two (2) test wells into the Mancos Formation utilizing horizontal drilling technologies on its leasehold within La Plata County, Colorado. Based on results of the initial wells, an additional six (6) wells may be drilled on the well pad for a total of eight (8) wells. To accommodate these wells, NueVida is proposing a multi-well gas location (well pad), access roads, pipeline, tank pad Temporary Use Area (TUA), and temporary pump pad on private land owned by the Ardourel Trust. The purpose of the wells would be to extract, separate, dehydrate, and transport natural gas from the wells to an above ground header system where three different gathering companies in the area have the ability to transport the gas for additional offsite treatment and processing for gas sales.

When fully operational, the well pad location will include eight-inch inlet and outlet pipelines, two (2) 400-barrel steel water tanks, two (2) two-phase vertical indirect heated vessels, one (1) small vertical fuel gas separator, one (1) dehydrator skid, and one (1) enclosed combustor. The Ardourel tank pad TUA will have approximately fifteen (15) 40,000-barrel tanks and four (4) 20,000-barrel tanks. NueVida will bring in electricity to the well pad for use in its production facilities/operations. La Plata Electric Association (LPEA) has high voltage electricity available at the El Paso Compressor Station, located in the SE/SE of Section 13, Township 33 North, Range 9 West, N.M.P.M. There is currently a low voltage, two-phase overhead line that runs west to east (approximately 380 feet) from the El Paso Station into the SW/SW of Section 18, Township 33 North, Range 8 West, N.M.P.M. This overhead line terminates and is located approximately 400 feet, north of County Road 318, along the lease access road to the well pad. LPEA will upgrade this 400-foot line to a higher voltage (TBD) three-phase line. From this end point, LPEA will install approximately 1,670 feet of new high voltage, three-phase overhead line to the NW end of the well pad. This new power line will run north paralleling the lease access road within existing ROW. LPEA will set an electric meter and supply 480 volt, three-phase service at the NW corner of the well pad. NueVida will set an electric panel from which it will run the electric supply to the various production units, motors/pumps and air supply. NueVida would install an eight (8)-inch HDPE (High Density Polyethylene) buried water pipeline and a ten (10)-inch steel buried gas pipeline from the northwestern corner of the well pad continuing north for 3,901.6 feet to an above ground header system where three different gathering companies would tie to. An additional eight (8)-inch HDPE buried water pipeline would be installed from the northwestern corner of the tank pad TUA continuing north for 966.9 feet to the northwestern corner of the well pad where it would tie to the aforementioned proposed eight (8)-inch HDPE buried water pipeline.

Access to the Project would be from County Road 318 to an existing graveled access road that is currently utilized by a different operator. From the existing graveled access road, two separate access roads will

connect with the tank pad TUA, and two separate access roads will connect to the well pad from the existing access road to accommodate for pass through traffic on both pads.

Construction of the well pad and tank pad TUA and installation of the water storage tanks will take approximately 58 days to complete. Drilling operations will take approximately 40 days to complete for the two wells. The drilling rig will then be removed, and a two-week period will begin for preparation to complete the wells. Completion operations for both wells will take approximately 30 days to complete. After completion, the tanks on the tank pad TUA will be removed, however, the produced water pad will remain in place while testing of the wells occurs to determine if additional wells may be drilled in subsequent years. The tank pad TUAs will be reseeded with use of tackifiers and/or erosion blankets after the removal of the tanks to stabilize the soils from potential erosion.

1.1 Project Location

The location for this proposed Project has been selected to meet a variety of technical and logistical needs. Key among these is an acceptable location between the field from which the gas is coming and the plant to which it is being delivered. This Project would be located near Ignacio, Colorado on Parcel Number 595318300056 and will be accessed from County Road 318, Ignacio, CO. The legal location for the project is the W/2 SW/4 of Section 18, Township 33 North, Range 8 West, N.M.P.M. This proposed location is currently occupied by sagebrush (*Artemisia tridentata*) shrubland with sparse pinyon pine (*Pinus edulis*) and Utah juniper (*Juniperus osteosperma*) trees scattered throughout. It is zoned for agricultural use. The location abuts other private properties on three sides and County Road 318 on the southern border.

2 PROJECT DESCRIPTION

2.1 Proposed Disturbance

The 34.51 acres of disturbance is comprised of 29.61 acres of area of disturbance, 4.31 acres of pipeline ROW, and 0.59 acre of existing graveled and two-track roads. The 29.61-acre area of disturbance would include a 6.54-acre level pad area for the well facilities and an additional 14.34-acre leveled pad for the tank pad TUA, 0.09 acre of new access roads, 0.42-acre temporary pump pad, 2.73 acres for TUA topsoil storage, and 5.09 acres of area that could be utilized for storm water management areas. The total 4.41 acres of pipelines will be both within the area of disturbance (0.10 acre) and on 4.31 acres of right-of-way (ROW) outside of the area of disturbance. The associated cut and fill slopes, additional room to implement necessary mitigations and Best Management Practices (BMP), soil storage, and a tank pad TUA are included in the overall surface disturbance. There is an existing graveled and two-track access road that totals 0.59 acre of disturbance. The well pad and all access roads will be graveled and maintained for the pre-production phases of the Project. After drilling and completion phases are finalized, the tank pad TUA, its associated access roads, and a portion of the well pad will be fully reclaimed (approximately 25.31 acres) for the production phase of the Project. Approximately 2.90 acres of the well pad will be leveled and reseeded only, leaving a total of 1.40 acres of long-term disturbance to remain as a graveled surface on the well pad and its associated access roads (see Table 2-1). The existing access road does provide access to an existing well pad location and will continue to be utilized by both NueVida and the existing well pad operator for the life of both wells.

The two Residential Building Units (RBU) nearest the Project are to the south and southwest of the Project location. Each is within the 2,000-foot setback distance. Wildlife species, specifically mule deer,

do have High Priority Habitat (HPH) within the disturbance area of the Project (see Attachment 1). This HPH is considered Mule Deer Severe Winter Range and typically operators are requested to restrict new construction or development activities during the winter closure period of December 1 through April 30. NueVida would not perform any pre-production construction or drilling operations during the closure period. During production, truck traffic would be limited to daylight hours and eight (8) vehicles per week as pumpers or foreman will need to complete routine checks on the well pad location.

Table 2.1 Project Disturbance Estimates for the Proposed Ardourel 33081718 Pad

Area of Disturbance Surface Disturbance (acres)					
Feature	Total Disturbance	New Disturbance	Fully Reclaimed	Reseeded Only	Long-term Disturbance
Well Pad	6.54	6.54	2.61	2.90	1.03
Tank Pad TUA	14.34	14.34	14.34*	-	-
Pump Pad	0.42	0.42	0.42*	-	-
Pipeline Corridor	0.1	0.1	0.1	-	-
New Access Roads for Well Pad	0.07	0.07	-	-	0.07
New Access Roads for Tank Pad TUA	0.02	0.02	0.02*	-	-
Existing Access Roads	0.3	-	-	-	0.3
TUA (Topsoil Storage for Well Pad)	1.55	1.55	1.55	-	-
TUA (Topsoil Storage for Tank Pad TUA)	1.18	1.18	1.18*	-	-
Area of Disturbance for Stormwater BMPs	5.09	5.09	5.09	-	-
Area of Disturbance Total:	29.61	29.31	25.31	2.90	1.40
Outside Area of Disturbance Surface Disturbance (acres)					
Pipeline Corridor	4.31	-	4.31	-	-
Existing Access Roads	0.59	-	-	-	0.59
Outside Area of Disturbance Total:	4.9	-	4.31	-	0.59
Overall Disturbance Total:	34.51	29.31	29.62	2.90	1.99

* Blue text indicates temporary disturbance that may remain for up to 5 years, all other temporary disturbance will be reclaimed no later than 2 years from the start of construction.

2.2 Soil Type Descriptions

Soil types found within the Project disturbance include Arboles clay, 3 to 12 percent slopes, Falfa clay loam, 3 to 8 percent slopes, and Zyme clay loam, 3 to 25 percent slopes according to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (see Table 2-2). The majority of the project would be within Arboles clay, 3 to 12 percent slopes (20.73 acres of total surface disturbance). Falfa clay loam, 3 to 8 percent slopes would be found primarily on the well pad and pipeline areas (13.07 acres of total surface disturbance) and a small portion of the pipeline would be found within Zyme clay loam, 3 to 25 percent slopes (0.73 acre of total surface disturbance).

Falfa clay loam, 3 to 8 percent slopes is a deep, well-drained soil with slow permeability. Erosion hazard for this soil is moderate and in areas where irrigation is utilized, water erosion may need managed. Proper vegetation growth will help maintain soil stabilization and minimize erosion from water. This soil type does have a high shrink-swell potential and a low soil strength.

Arboles clay, 3 to 12 percent slopes is also a deep, well-drained soil with a fine textured alluvium derived from shale. In most undisturbed soil areas, the surface layer will be a silty clay loam. Permeability of the Arboles clay, 3 to 12 percent slopes is slow and it has a medium runoff potential. Erosion hazard is moderate as well and when the soil is dry, deep wide cracks can be visible at the surface. Sagebrush is a dominant shrub in areas left as rangeland. This soil type does have a high shrink-swell potential and a low soil strength.

Zyme clay loam, 3 to 25 percent slopes This soil type consists of well drained soils that formed from residuum weathered from shale. Zyme soils are typically located on crest, side slopes, ridges, hills and base slopes. Slopes range from 3 to 25 percent. This soil is well drained and a negligible to very high runoff depending on slope and moderately slow to slow permeability. This soil is not prime farmland, the depth to restrictive feature is 6 to 20 inches to paralithic bedrock and greater than 80 inches to water table.

Table 2.2. Soil Types and Disturbance Estimates for the Proposed Ardourel Pad

Soil Type	Surface Disturbance (acres)
Arboles clay, 3 to 12 percent slopes	20.73
Falfa clay loam, 3 to 8 percent slopes	13.06
Zyme clay loam, 3 to 25 percent slopes	0.72
Total:	34.51

2.3 Vegetation Descriptions

The Project is entirely zoned as agricultural use according to zoning specified by La Plata County. It is within sagebrush shrubland habitat with some sparse pinyon-juniper trees scattered throughout the well pad and temporary tank pad. Areas surrounding the Project location are comprised of sagebrush shrublands or pinyon-juniper woodlands.

2.4 Truck Traffic Descriptions

Each stage of the Project will have differing amounts of truck traffic. Pre-production activities will experience the greatest amount of traffic as the Project is constructed, drilled, completed, and interim

reclaimed. The production phase of the well pad will have minimal traffic, and trips will be limited to monitoring or maintenance activities associated to the Project. The estimated round-trip truck trips per each stage of the Project is listed below in Table 2-3 and is further broken down per pickup or semi-truck.

Table 2.3. Estimated Round-trip Truck Trips per Phase for Proposed Ardourel 33081718 Pad

Phase of Project	Total Estimated Pickup Truck Trips	Total Estimated Semi-Truck Trips
Construction (pre-production)	314	833
Drilling (pre-production)	600	235
Completion (pre-production)	456	1,344
Interim reclamation (production)	60	43
Production	34/month (12,240/30 years)	0

3 DUST SOURCES AND BEST MANAGEMENT PRACTICES

NueVida has taken into account the amount of truck trips for each phase of the Project that have the potential for creating dust. Dust may also be caused from seasonal winds in the area, particularly in places of exposed soil prior to the successful establishment of vegetation in reclaimed areas. Any dust from Project truck traffic could have effects on houses or residents in the surrounding area and on wildlife that may be utilizing the area for grazing or bedding down. Dust can also impact vegetation growth and overall health of vegetation if dust suppression is not being managed. Wind in the area typically comes out of the southwest. As the pinyon-juniper trees and sagebrush vegetation would remain on the west side of the access road, it would aid as a wind break to reduce dust blowing from the access road.

During completion operations, NueVida will make use of proppants while hydraulic fracturing operations are conducted. This will involve 100 mesh sand and 40/70 mesh sand to be delivered to the location by trucking in closed metal containers. Dust control socks will be placed on the sand masters or mountain movers and storage bins to control the spread of fugitive silica dust. Additionally, a Total Dust Control System (Sierra Frac Sand, LLC or equivalent) will be implemented to control the release of fugitive dust from inspection hatches on any bulk storage movers, transfer bels, “T” or “V” belts leading to the blender hopper, or drop points throughout the activities of unloading, storing, or transferring of sand used in the hydraulic fracturing operation. NueVida is committed to the continued management of fugitive dust during all phases of the Project by the implementation of the below mentioned Best Management Practices (BMP).

The BMPs that would be used for the Project to eliminate and mitigate fugitive dust include, but are not limited to, regular road maintenance, speed restrictions for vehicles, and regular application of non-potable water during high traffic periods. The access roads and leveled pad surfaces will be graveled during the pre-production phases to provide stable working surfaces. Chances of wind creating dust on disturbed surfaces is greater but would be mitigated with water control measures during the high traffic periods, especially during the pre-production phases. Mule deer are not likely to be impacted by any fugitive dust because NueVida has agreed to adhere to timing restrictions from December 1 until April 30 and will not have any pre-production activities take place during the closure period. Once the wells have

been completed and are in production, interim reclamation will occur on the well pad to reduce the overall exposed surface. The temporary tank pad would be fully reclaimed after drilling and completion activities and revegetation to the native vegetation will minimize dust caused by wind. Truck traffic will be limited to one to two vehicles per day during the production phase, therefore dust from vehicles will be minimal.

Based off several onsite field visits with COGCC, CPW, La Plata County personnel, environmental consultants, and the landowner, NueVida is committed to implementing the below avoidance and mitigation measures to reduce fugitive dust from activities associated with the Project.

BMPs for All Phases

- Regular road maintenance (including grading and compacting the road surface with water suppression if heavy truck traffic or weather events cause the road to deteriorate).
- Speed restrictions keeping traffic to 10 miles per hour when on the access roads.
- Application of non-potable water (or other alternatives such as magnesium chloride, etc.) during periods of heavy truck traffic.

BMPs for Pre-Production Phases

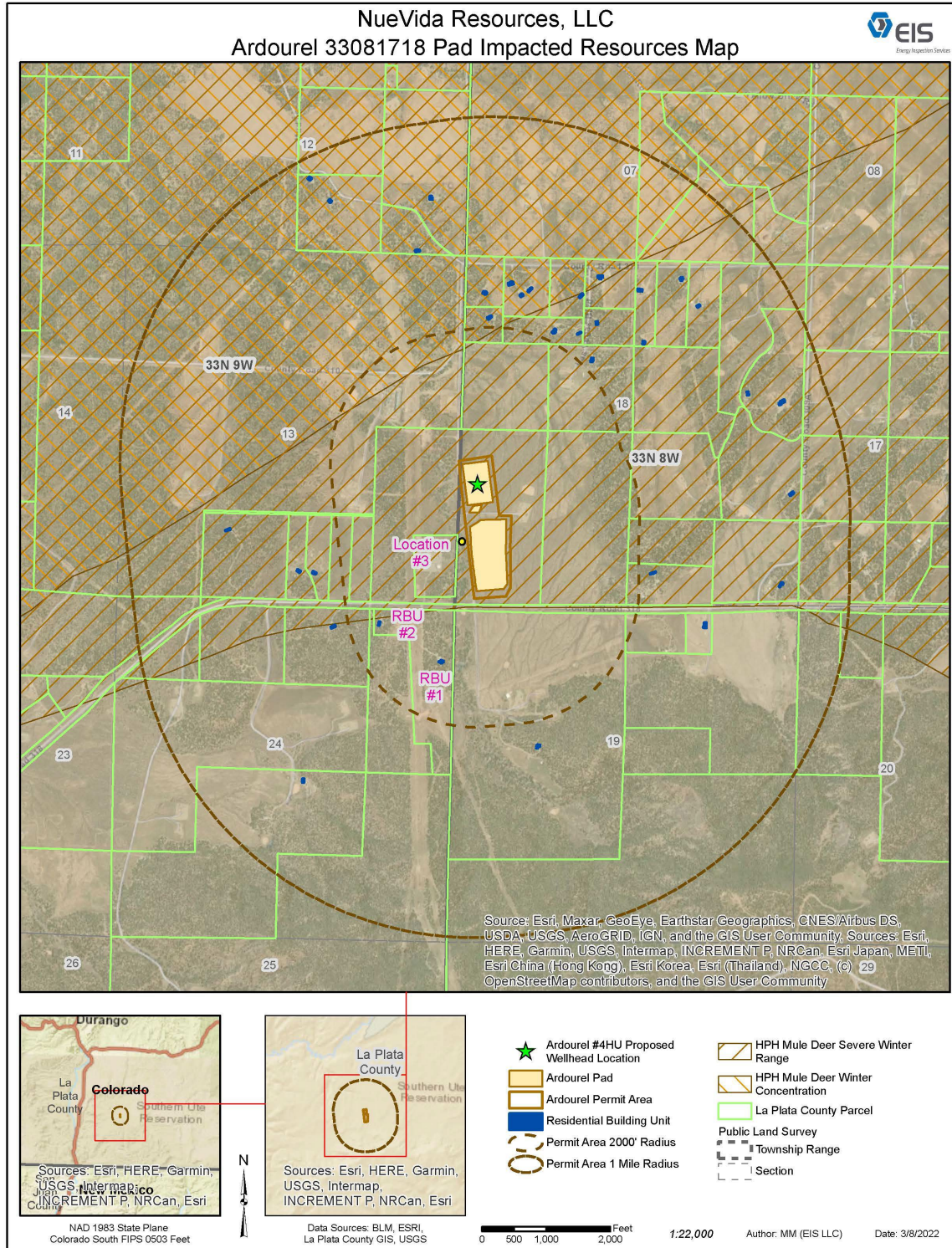
- Timing restrictions for construction activities to occur outside the restriction window of December 1 to April 30.
- Prior to the winter closure or the summer seeding window closure, unseeded slopes shall be mulched with two tons of mulching material (weed free) per acre and mechanically crimped into topsoil.
- Topsoil storage piles will be stabilized by seeding with use of tackifiers and/ or erosion control blankets, while being stored before full reclamation of the water storage pad.
- Use of dust control socks and a Total Dust Control System to minimize fugitive silica dust from releasing during activities related to unloading, storing, or transferring of sand during the hydraulic fracturing operation.

BMPs for Production Phase

- Interim reclamation and reseeding of exposed surfaces to reduce bare ground exposure.
- Two tons of certified weed free hay or two and half tons of certified weed free straw per acre would be applied and mechanically crimped into the soil after reseeding.
- Production facilities will have automation that will help reduce pumper and/or foreman time on location for monitoring operational activities of the wells and equipment, especially during inclement weather.

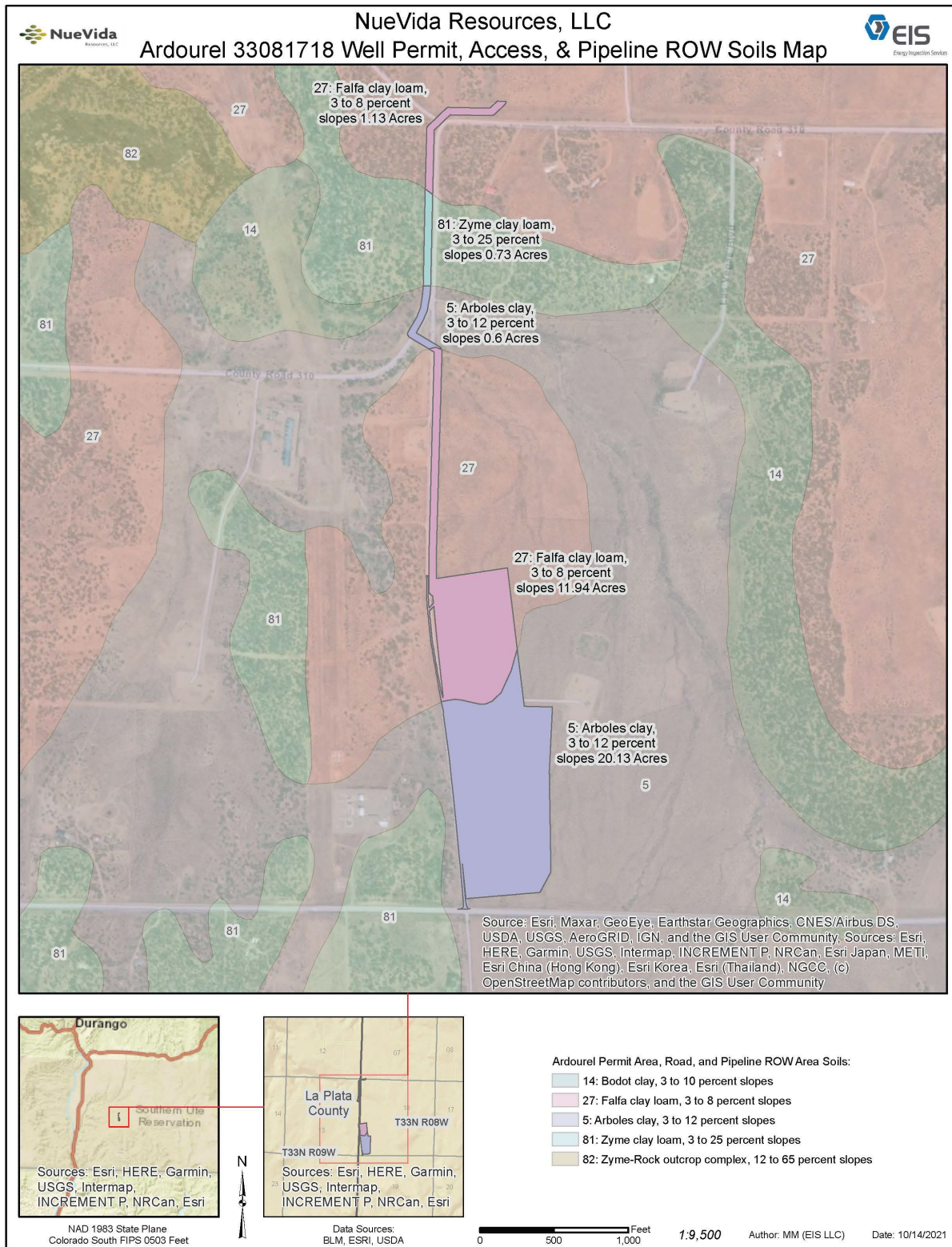
4 LIST OF APPENDICES

Appendix I. Map of Potentially Impacted Resources



Ardourel 33081718 Pad Dust Mitigation Plan

Appendix II. Map of Soil Types



Ardourel 33081718 Pad Dust Mitigation Plan

Appendix III. NRCS Soil Descriptions

Map Unit Description: Arboles clay, 3 to 12 percent slopes---La Plata County Area, Colorado

La Plata County Area, Colorado

5—Arboles clay, 3 to 12 percent slopes

Map Unit Setting

National map unit symbol: 1yp0
Elevation: 6,000 to 7,000 feet
Mean annual precipitation: 14 to 18 inches
Mean annual air temperature: 47 to 50 degrees F
Frost-free period: 110 to 130 days
Farmland classification: Not prime farmland

Map Unit Composition

Arboles and similar soils: 80 percent
Minor components: 20 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Arboles

Setting

Landform: Valleys
Landform position (three-dimensional): Side slope, base slope
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Fine-textured alluvium derived from shale

Typical profile

H1 - 0 to 6 inches: clay
H2 - 6 to 30 inches: clay, silty clay
H2 - 6 to 30 inches: clay loam, silty clay loam, clay
H3 - 30 to 60 inches:
H3 - 30 to 60 inches:
H3 - 30 to 60 inches:

Properties and qualities

Slope: 3 to 12 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: High
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: 10 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Very high (about 23.0 inches)



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

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Ardourel 33081718 Pad Dust Mitigation Plan

Map Unit Description: Arboles clay, 3 to 12 percent slopes---La Plata County Area, Colorado

Interpretive groups

Land capability classification (irrigated): 4e

Land capability classification (nonirrigated): 4e

Hydrologic Soil Group: C

Ecological site: R036XY289CO - Clayey Foothills

Hydric soil rating: No

Minor Components

Bodot

Percent of map unit: 15 percent

Hydric soil rating: No

Other soils

Percent of map unit: 4 percent

Hydric soil rating: No

Aquents

Percent of map unit: 1 percent

Landform: Depressions

Hydric soil rating: Yes

Data Source Information

Soil Survey Area: La Plata County Area, Colorado

Survey Area Data: Version 19, Sep 1, 2021

Ardourel 33081718 Pad Dust Mitigation Plan

Map Unit Description: Falfa clay loam, 3 to 8 percent slopes—La Plata County Area, Colorado

La Plata County Area, Colorado

27—Falfa clay loam, 3 to 8 percent slopes

Map Unit Setting

National map unit symbol: 1yn6
Elevation: 6,500 to 7,000 feet
Mean annual precipitation: 15 to 18 inches
Mean annual air temperature: 48 to 49 degrees F
Frost-free period: 100 to 120 days
Farmland classification: Not prime farmland

Map Unit Composition

Falfa and similar soils: 80 percent
Minor components: 20 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Falfa

Setting

Landform: Mesas
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Calcareous loess

Typical profile

H1 - 0 to 9 inches: clay loam
H2 - 9 to 34 inches: clay, silty clay, clay loam
H2 - 9 to 34 inches: clay, silty clay, clay loam
H2 - 9 to 34 inches: loam, clay loam
H3 - 34 to 57 inches:
H3 - 34 to 57 inches:
H3 - 34 to 57 inches:
H4 - 57 to 60 inches:
H4 - 57 to 60 inches:

Properties and qualities

Slope: 3 to 8 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: High
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: 10 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Very high (about 25.9 inches)

Ardourel 33081718 Pad Dust Mitigation Plan

Map Unit Description: Falfa clay loam, 3 to 8 percent slopes--La Plata County Area, Colorado

Interpretive groups

Land capability classification (irrigated): 4e

Land capability classification (nonirrigated): 4e

Hydrologic Soil Group: C

Ecological site: R036XY289CO - Clayey Foothills

Other vegetative classification: Loamy Foothill (048AY284CO)

Hydric soil rating: No

Minor Components

Other soils

Percent of map unit: 10 percent

Hydric soil rating: No

Corta

Percent of map unit: 8 percent

Hydric soil rating: No

Aquents

Percent of map unit: 2 percent

Landform: Depressions

Hydric soil rating: Yes

Data Source Information

Soil Survey Area: La Plata County Area, Colorado

Survey Area Data: Version 19, Sep 1, 2021

Ardourel 33081718 Pad Dust Mitigation Plan

Map Unit Description: Zyme clay loam, 3 to 25 percent slopes--La Plata County Area, Colorado

La Plata County Area, Colorado

81—Zyme clay loam, 3 to 25 percent slopes

Map Unit Setting

National map unit symbol: 1yq4
Elevation: 6,000 to 7,000 feet
Mean annual precipitation: 14 to 18 inches
Mean annual air temperature: 45 to 50 degrees F
Frost-free period: 110 to 130 days
Farmland classification: Not prime farmland

Map Unit Composition

Zyme and similar soils: 70 percent
Minor components: 30 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Zyme

Setting

Landform: Ridges, hills
Landform position (three-dimensional): Crest, side slope, base slope
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Residuum weathered from shale

Typical profile

H1 - 0 to 4 inches: clay loam
H2 - 4 to 10 inches: silty clay loam, clay, clay loam
H2 - 4 to 10 inches: weathered bedrock
H2 - 4 to 10 inches:
H3 - 10 to 14 inches:

Properties and qualities

Slope: 3 to 25 percent
Depth to restrictive feature: 6 to 20 inches to paralithic bedrock
Drainage class: Well drained
Runoff class: High
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: 10 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Low (about 3.7 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Ardourel 33081718 Pad Dust Mitigation Plan

Map Unit Description: Zyme clay loam, 3 to 25 percent slopes--La Plata County Area, Colorado

Land capability classification (nonirrigated): 6e
Hydrologic Soil Group: D
Ecological site: R036XY446CO - Southwestern Mountain -
(Pinyon-Juniper)
Hydric soil rating: No

Minor Components

Bodot

Percent of map unit: 15 percent
Hydric soil rating: No

Arboles

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

Other soils

Percent of map unit: 5 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: La Plata County Area, Colorado
Survey Area Data: Version 19, Sep 1, 2021



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

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