COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

DIRECTOR'S RECOMMENDATION

Docket Nos. 220300066 and 220800201

CPX Piceance Holdings LLC (CPX), Operator Number 10639

TPR 25A Pad OGDP (OGDP ID #482255) and
TPR Pad 25B (OGDP ID# 482775)

Pursuant to Rule 306, the Director[1] submits to the Commission this recommendation for **APPROVAL** of *two* CPX Oil and Gas Development Plans (OGDPs) located in Garfield County.

The underlying permit documents in support of this Recommendation may be found through the Colorado Oil and Gas Conservation Commission (COGCC) website under "Permits".

TPR Pad 25A ("25A Pad")	***TPR Pad 25B ("25B Support Pad")***
Docket No. 220300066	***Docket No. 220800201***
Form 2C #402953217	Form 2C #403092745
Form 2A #402860020	Form 2A #403077002
Form 2B #402889799	Form 2B #403092743

All supporting hearing documents, including CPX's OGDP hearing application may be found in the COGCC's eFiling System, under Docket Nos. 220300066 and 220800201.

BACKGROUND

On March 31, 2022, CPX filed a Form 2C, Oil and Gas Development Plan Certification, hearing application, and all required components for the TPR 25A Pad ("25A Pad") OGDP application. Staff returned the hearing application to CPX twice for corrections. The application was deemed complete on May 31, 2022.

On August 2, 2022, CPX filed a Form 2C, hearing application, and all required components for the TPR Pad 25B (Temporary Water Support Pad, "25B Support Pad") OGDP application. The application was deemed complete on August 21, 2022.

During technical review of the 25A Pad application and completeness review of the 25B Support Pad application, Staff determined that the operations proposed in the two OGDPs are necessarily dependent on each other such that the two applications should be reviewed and considered concurrently. CPX requested that staff continue reviewing the individual applications concurrently to avoid restarting the application process and to potentially meet CPX's

[1] Any term not defined in this Director's Recommendation may be found in the COGCC's 100 Series Rules,https://cogcc.state.co.us/reg.html#/rules

anticipated timeline for commencement of operations in the Fall of 2022. Staff completed the technical review of both OGDP applications concurrently and through a comprehensive "single OGDP" lens. This Director's Recommendation describes Staff's review of both OGDP applications as a single development plan.

This Director's Recommendation is based on the content of both applications as of September 18, 2022. No additional revisions will be made to the applications prior to the Commission Hearing scheduled for September 21, 2022.

PROPOSED DEVELOPMENT

The 25A Pad OGDP proposes a reoccupation of the existing TPR 25A Location (Location ID# 334457) for the development of minerals. The OGDP is located in Township 7 South, Range 94 West, portions of Sections 25 and 26, and Township 8 South, Range 94 West, portions of Section 6 (Application Lands). The Location is within a sparsely populated area of unincorporated Garfield County, on land that is owned by CPX (Tepee Park Ranch) and surrounded by the White River National Forest, approximately 9 miles south-southwest of the City of Rifle. There are no Residential Building Units (RBUs) or High Occupancy Building Units (HOBUs) within one mile of the Location; the Location is not within a Disproportionately Impacted (DI) Community. The Location and associated access road and pipeline corridor are in High Priority Habitat (HPH).

The 25A Pad Location currently has three existing wells: two are producing and one is drilled but not completed (DUC). The 25A Pad OGPD proposes to add an additional 34 wells, for a total of 37 wells on the pad. The OGDP also proposes to convert the DUC well into a class II Underground Injection Control (UIC) well for the disposal of produced water generated by the new wells. CPX submitted a Form 31 (#402948794) Underground Injection Formation Permit Application, a Form 33 (#402985833) Injection Well Permit Application, and a Form 2 (#403056476) Application for Permit to Drill/Recomplete concurrent with this Form 2A as required by Rule 803.b.(1). Additional surface equipment will include 36 separators, 7 produced water tanks, 1 condensate tank, 7 injection pumps, and other associated equipment to support the production of 36 gas wells and one UIC well. Drill cuttings will be buried in a cuttings trench onsite.

The 25B Support Pad OGDP proposes a new Location immediately adjacent to the existing TPR 25A Pad Location, also on CPX's Tepee Park Ranch surface. There are no RBUs or HOBUs within one mile of the Location; the Location is not within a DI Community. The existing access (approach) road crosses HPH.

This new 25B Support Pad will be used as a support facility for operations on the 25A Pad Location and other existing and future CPX well pad Locations. The Location will include 12 Modular Large Volume Tanks (MLVTs), to be used for the storage of produced water for reuse/recycling in completions operations and storage for produced water to be disposed of in the 25A Pad UIC well.

Two other existing CPX Locations will also support the proposed operations on both the 25A Pad and 25B Support Pad:

- Pad 36A (Loc ID#334460), approximately ½ mile south of the 25A Pad, will be utilized for remote frac operations as described below. CPX intends to conduct simultaneous operations (SIMOPS) on the Pad 36A: as the proposed new wells are drilled on the 25A Pad, those wells will be completed via remote frac staged on the Pad 36A. CPX intends to construct three permanent flowlines (gas, condensate, and produced water) in a single buried trench along the existing access road between the Pad 36A and the 25A Pad in 3rd and/or 4th quarter 2022 for future development of wells on the Pad 36A. COGCC does not have permitting authority over off-location flowlines and cannot grant permission for this construction with the approval of either OGDP applications being considered in this Director Recommendation. Local government approval may be required.
- Pad 2 Tank Battery (Loc ID# 455779), approximately 1.8 miles north of the 25A Pad, currently receives condensate, produced water, and natural gas from the existing producing wells on the 25A Pad via three existing buried flowlines. Produced water and condensate are hauled off the Pad 2 Tank Battery by a third party, and gas enters a third party tie-in adjacent to Pad 2. CPX is finalizing a water share agreement to receive recycled produced water from TEP's Beaver Creek Pit (Loc ID# 432702) to Pad 2; this agreement will be submitted to the Director for approval 60 days prior to implementation per Rule 905.c.(5). The recycled water will be delivered to the Pad 2 Tank Battery via a temporary surface line. The water will then be pumped through the existing (bidirectional) water line to the 25A Pad, where it will be stored on the 25B Support Pad for future use in completions operations. After the proposed new wells are drilled on the 25A Pad, the recycled water will be piped via a temporary surface line from the 25B Support Pad to Pad 36A, where it will be blended, pressurized, and used for remote frac operations for the 25A Pad[2]. Completions and flowback water from the 25A Pad will be separated onsite, and returned to the 25B Support Pad for storage.

Approximately 4.13 acres of total new surface disturbance is proposed between both OGDPs:

- No new surface disturbance is required at the existing 25A Pad. Interim reclamation will reduce the operational pad down to 1.8 acres.
- 25B Support Pad: 4.13 acres. Interim reclamation will reduce the operational pad down to 1.83 acres.

[2] CPX acknowledges that remote frac operations on the 36A Pad may not commence until approved by the Commission through the OGDP and Form 2A process for the 36A Pad. CPX anticipates submitting an OGDP application for this Location in Q4 2022 or Q1 2023. If the 36A Pad is not available for remote frac operations, CPX will conduct frac operations directly onsite on the 25A Pad; Staff notes that this may require an amended OGDP and amended Form 2A.

DRILLING AND SPACING CONSIDERATION

For the 25A Pad OGDP, CPX requests the development of FEE minerals covering approximately 415 total acres from the Williams Fork and Iles formations of the Mesa Verde Group. The development of these minerals is authorized pursuant to Commission basin-wide Order 1-229. Order No. 1-229 established downhole well density and subsurface setbacks for portions of the Piceance basin. Well density is allowed equivalent to one well per ten acres, and setbacks are 100 feet from the north and south unit or lease line, and 600 feet from the east and west unit or lease line. The spacing proposed by CPX complies with applicable COGCC rules and is supported by Engineering testimony submitted in Docket No. 220300066. No wells will be drilled as part of the 25B Support Pad OGDP, and no spacing is required.

FINANCIAL ASSURANCE

Staff confirmed that CPX has a valid blanket plugging bond on record consistent with Rule 702.

PUBLIC COMMENT

The public comment period for the 25A Pad OGDP was open for 30 days from May 31, 2022 to June 30, 2022 per Rule 303.d.(1).A.ii; no public comments were received. The public comment period for the 25B Support Pad opened for 30 days on August 21, 2022, and will close on September 20, 2022.[3] No public comments have been received to date as of September 16, 2022; any comment received after the publishing of this Director Recommendation will be reviewed by the Director and addressed during the hearing, as scheduled for September 21, 2022.

LOCAL GOVERNMENT PERMITTING AND PRE-APPLICATION CONSULTATIONS

Relevant Local and Proximate Governments:
Garfield County is the Relevant Local Government for both Oil and Gas Locations considered in these two OGDPs. There are no other local governments within 2,000 feet of either Working Pad Surface.

CPX and COGCC Staff participated in a pre-application consultation with Garfield County on September 15, 2021 for the 25A Pad, and on July 19, 2022 for the 25B Support Pad (see "Consultation Summary" attachments on the Form 2As). Garfield County determined that no local permit is required for either Location, and supports the approval of both OGDP applications.

Colorado Parks and Wildlife (CPW):
CPX participated in pre-application consultation and an onsite visit with CPW on May 27, 2021 to request various waivers for the 25A Pad (see "CPW Consultation" attached to the Form 2A).

[3] As noted above, it was recently decided to review the two OGDPs concurrently, which resulted in the public comment period closing just before the Commission hearing.

The existing Location, access road, and flowline corridor are in Rule 1202.c.(1).R HPH (cutthroat trout and native fish conservation waters), and thus meet the criteria for an Alternative Location Analysis (ALA) per Rule 304.b.(2).B. In addition, CPX plans to install certain equipment within 500 feet of an unnamed drainage, which is not permitted without a CPW waiver pursuant to Rule 1202.a.(3). The pre-application consultation resulted in the following:

1. CPW provided to CPX a waiver for the ALA (see "CPW Waiver Rule 304.b.(2).B.viii" attached to the Form 2A);
2. CPW provided to CPX a waiver to site equipment within 500 feet of an unnamed drainage (see "CPW Waiver Rule 1202.a.(3)" attached to the Form 2A);
3. CPW provided to CPX a waiver to conduct operations within Rule 1202.c.(1).R HPH (see "CPW Waiver Rule 1202.c.(1).R" attached to the Form 2A).

CPX additionally requested in July 2022, and received from CPW in August 2022, a letter of support for the access road and flowline crossing through Rule 1202.c.(2).C HPH with the addition of Best Management Practices (BMPs) sufficient to protect wildlife resources (see "CPW Consultation Rule 1202.c.(2).C" attached to the Form 2A).

CPX participated in a pre-application consultation and onsite with CPW on June 2, 2022, for the 25B Support Pad (see "CPW Consultation" attached to the Form 2A). The proposed Location is not within HPH, but CPX intends to reroute 310 feet of the existing access road through Rule 1202.c.(1).R HPH (cutthroat trout and native fish conservation waters) in order to install more effective stormwater controls. CPW provided to CPX a letter in support of the proposed rerouting with the implementation of additional BMPs necessary to protect wildlife resources (see "CPW Consultation" attached to the Form 2A).

Please see the Director's Consultation section below for Staff's review and the Director's response to these CPW pre-application consultations.

DIRECTOR'S CONSULTATION

The Director consulted with CPW on both OGDP Applications pursuant to Rule 309; summary and results are as follows:

<u>For the 25A Pad</u>:

1. *Staff supports CPW's waiver of the ALA for Rule 304.b.(2).B.* Staff agrees with CPW's determination that reoccupying this existing pad will cause less adverse impact to aquatic species and HPH than a new surface disturbance. No ALA is required.
2. *Staff supports CPW's waiver of Rule 1202.a.(3).* CPX proposes to locate a condensate transfer pump, a pig launcher, and liquids knock-out approximately 490 feet from an unnamed drainage. The unnamed drainage does not appear to have an ordinary high water mark (OHWM), and the drainage is cross-gradient rather than downgradient from the proposed equipment, so spills or releases from these facilities would not likely flow toward the drainage. Staff agrees with CPW's determination that the successful

implementation of CPX's proposed stormwater BMPs will minimize risk to aquatic species.

3. *Staff supports CPW's waiver of Rule 1202.c.(1).R, and the Director grants an exception, as allowed by Rule 309.e.(5).D*. Portions of the existing Location are within "no surface occupancy" mapped cutthroat trout crucial HPH. Rule 309.e.(5).D allows certain operations to occur within that HPH between 300-500 feet of the OHWM if CPW provides a waiver, and the Director grants an exception to Rule 1202.c.(1).R, and the Operator agrees to additional BMPs as listed in Rule 309.e.(5).D. Staff supports CPW's waiver, and notes that the required BMPs have been added to the Form 2A. Staff recommends, and the Director grants the exception to Rule 1202.c.(1).R; the exception has been noted on the Form 2A in the General Comments section.
4. *Staff concurs with CPW's determination on the pipeline and access road in Rule 1202.c.(1).R cutthroat trout HPH, as allowed per Rule 1202.c.(2).C.* CPW reviewed CPX's proposed BMPs and found them sufficient to address any anticipated adverse impacts. The BMPs have been added to the Form 2A.

For the 25B Support Pad:

1. *Staff concurs with CPW's determination on re-routing the access road in Rule 1202.c.(1).R cutthroat trout HPH, as allowed per Rule 1202.c.(2).C.* CPW reviewed CPX's proposed BMPs and found them sufficient to address any anticipated adverse impacts. The BMPs have been added to the Form 2A.

ADMINISTRATIVE CONSIDERATIONS

Request for Commission to Require Consolidation of Future OGDPs:
As set forth in the Multi Pad Flowline Exhibit attached to both Form 2As, CPX intends to submit an OGDP for its Pad 36A for use as a remote frac support facility for completions operations on the 25A Pad. Pad 36A was constructed under a previously approved Form 2A, but no wells were ever drilled to total depth on this Location. CPX intends to stage frac equipment on Pad 36A, and send pressurized frac fluid to the 25A Pad for completions of the proposed new wells. CPX also intends to permit and drill new wells on Pad 36A, using the 25B Support Pad for storage of produced water. In light of the deeply interconnected and mutually dependent operations described in CPX's 25A Pad OGDP and 25B Support Pad OGDP, Staff requests that the Commission direct CPX to seek an amendment to the 25A Pad OGDP and the 25B Support Pad OGDP for the Pad 36A. A single OGDP for the three locations is important for two reasons. First, for Staff to effectively evaluate the Cumulative Impacts from the operations at these three locations, one Cumulative Impacts analysis should be completed and provided in a single Form 2B Cumulative Impacts Data Identification. Second, one OGDP for the three locations provides significant administrative and regulatory efficiencies.

Lesser Impact Area Exemption Request Summary:
CPX requested a Lesser Area Impact Exemption (LIAE) from the requirements to submit a Noise Mitigation Plan (304.c.(2)) and a Light Mitigation Plan (304.c.(3)) as part of the Form 2A for both OGDP applications. For both OGDPs, no RBUs are within one mile of a Location, and

although both Locations are within or adjacent to HPH, Staff confirmed with CPW that neither noise nor light are anticipated to impact aquatic species at these Locations. The Director granted the exemptions on April 27, 2022 for the 25A Pad and August 18, 2022, for the 25B Support Pad. See LIAE Requests attached to the Form 2As.

Condition of Approval on the 25B Support Pad - Three Year Duration of Operations:
Staff identified that the proposed operations on the 25B Support Pad Location approach the COGCC definition of a Centralized E&P Waste Management Facility. However, CPX clarified that the 25B Support Pad is not intended to be used as a Centralized E&P Waste Facility, and that all operations will cease and facilities will be taken out of service in less than three years from the commencement of operations. Staff has added the following Condition of Approval (COA) to the 25B Support Pad Form 2A:

> *No produced or recycled water may be stored at this Location beyond three years from the commencement of facility use. If operations are not discontinued within this three year period, Operator will submit for Director approval a Form 28 E&P Waste Management Permit, addressing all the Rule 907 requirements, and provide all required financial assurance, at least 60 days prior to the 3-year anniversary of the date the first fluids enter an MLVT or other storage tank. No operations may occur after three years without a valid approved Form 28.*

Condition of Approval on the 25B Support Pad - MLVTs:
CPX indicated to Staff that the type (manufacturer/vendor), number, and size of the Modular Large Volume Tanks (MLVTs) proposed for the 25B Support Pad have not been fully finalized due to availability uncertainties. Staff added the following COA to the Form 2A:

> *Within seven days of installation of MLVTs, Operator will submit a Sundry Notice Form 4 listing the MLVT manufacturer or vendor, number and size of MLVTs, and the Operator's certifying statement that MLVTs will be designed and implemented consistent with COGCC's June 13, 2014 MLVT Policy.*

COGCC STAFF'S TECHNICAL REVIEW HIGHLIGHTS

This section addresses issues related to siting, public health, safety, welfare, the environment, and wildlife resources, within the context of § 34-60-106(2.5)(a) .

<u>Public Health, Safety, and Welfare Considerations</u>
No RBUs are within one mile of the existing 25A Pad Location or the proposed 25B Support Pad Location. In addition, there are no HOBUs, School Facilities, or Child Care Centers within one mile of either Location, and neither Location is within a DI Community.

Staff has determined that the proposed site-specific BMPs will adequately avoid, minimize and/or mitigate any potential adverse impacts to public health, safety and welfare.

Environmental Resource Considerations

For both the 25A Pad and the 25B Support Pad Locations, Staff has determined through several on-site visits and evaluation of information provided on the Hydrology Map, the Locations do not lie within a Sensitive Area for water resources. Groundwater is between 40-80 feet below ground surface, and the nearest surface water, Beaver Creek, is approximately 930 feet east and downgradient from the 25B Support Pad and 1,440 feet northeast and downgradient from the 25A Pad.

Staff's technical review of the Layout Drawings, Stormwater Management Plan, Interim Reclamation Plan, Fluid Leak Detection Plan, Dust Mitigation Plan, and Topsoil Protection Plan determined that there are few significant potential impacts to other environmental resources such as soils and vegetation. Staff also determined that the use of the surface for oil and gas operations at this Location is not incompatible with current land use.

CPX provided BMPs that avoid, minimize, or mitigate impacts to water and environmental resources, including engineering controls and administrative controls. Staff has included these BMPs on the Form 2As. Staff concludes that the risk of impacts to water and environmental resources will be minimized by the successful implementation of the proposed BMPs.

Wildlife Resource Considerations

The 25A Pad Location, access road, and pipeline corridor are sited within Rule 1202.c.(1).R cutthroat trout designated crucial habitat and native fish and other native aquatic species conservation waters (no surface occupancy permitted within 500 feet of the OHWM). Under Rule 309.e.(5).D, CPW and the Director determined that the operations proposed within the allowable 300-500 foot buffer of the OHWM will not significantly impact aquatic resources, given the successful implementation of additional BMPs included in the applications. CPX is also seeking to situate equipment within 500 feet of an unnamed drainage; through onsite visits and desktop review CPW and Staff determined that the drainage has a very low likelihood of flowing as an intermittent or ephemeral stream due to the occurrence of terrestrial vegetation and natural debris. CPW granted, and staff supports, a waiver from Rule 1202.a.(3), particularly since the equipment being situated near this drainage will be approximately 490 feet away. Moving the equipment outside the rule-based 500 foot buffer will not add significant protection.

The 25B Support Pad is not in any HPH. However, approximately 310 feet of the existing access road will be re-routed to make improvements to the stormwater BMPs. This re-routing will occur in Rule 1202.c.(1).R cutthroat trout designated crucial habitat and native fish and other aquatic species conservation waters. Rule 1202.c.(2).C allows for this activity to occur in cutthroat trout habitat if CPW determines that BMPs provide sufficient protection. CPW did make such a determination based on the BMPs provided by CPX, and Staff concurs.

No compensatory mitigation for direct or indirect impacts is required for either OGDP, since neither the 25A Pad nor the 25B Support Pad are within Rule 1202.d "density" HPHs. CPX did identify two Rule 1202.d "density" HPHs approximately one mile east of both Locations: Elk Production area and Elk Winter Concentration area. Development proposed in both OGDP

applications will avoid potential impacts to mapped elk habitats because the pads are separated from elk habitats by a ridgeline and by 0.75-1 mile of dense spruce and fir forest and aspen woodlands. Elk use of habitat in the area is concentrated in the Mamm Creek area to the east and the Porcupine Creek area to the west. The combination of topography, forest cover, and distance attenuates noise and light and avoids potential impacts to mapped habitat.

DIRECTOR'S RECOMMENDATION:

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGDPs proposed operations and its potential impacts to public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that these OGDPs comply with all applicable requirements of the Commission's Rules and recommends approval by the Commission.

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

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

Oil and Gas Location Assessment

Document Number: 402860020

Date Received: 03/31/2022

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: **334457**

OGDP ID:

Expiration Date:

☐ New Location ☐ Refile ☒ Amend Existing Location # 334457

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
220300066		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

<No existing OGDP number provided>

CONSULTATION

☐ This location is included in a Comprehensive Area Plan (CAP). CAP ID #

☒ This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.

☐ This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).

☐ This Location includes a Rule 309.e.(2).E variance request.

☐ This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 10639

Name: CPX PICEANCE HOLDINGS LLC

Address: 34 S WYNDEN DR STE 240

City: HOUSTON State: TX Zip: 77056

Contact Information

Name: Nicholas Kurtenbach

Phone: (713) 554-9031

Fax: ( )

email: nick@cpxpiceance.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20160118

☐ Gas Facility Surety ID (Rule 711):

☐ Waste Management Surety ID (Rule 704):

LOCATION IDENTIFICATION

Name: TPR Well Pad Number: 25A

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: SWSE Section: 25 Township: 7S Range: 94W Meridian: 6 Ground Elevation: 9129

Latitude: 39.404522 Longitude: -107.832789

GPS Quality Value: 2.5 Type of GPS Quality Value: PDOP Date of Measurement: 08/20/2021

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	455779	401645901

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: GARFIELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. No

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? No

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location:

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Sheryl Bower Contact Phone: (970) 945-1377

Contact Email: sbower@garfield-county.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

Please see Garfield County Consultation Summary attached to this Form 2A application. Garfield County contact information:
Sheryl Bower
Community Development Director
108 8th St., Suite 401
Glenwood Springs, CO 81601
(970) 945-1377 (x1605)
sbower@garfield-county.com

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? No

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- ☐ i. WPS < 2,000 feet from RBU/HOBU
- ☐ ii. WPS < 2,000 feet from School/Child Care Center
- ☐ iii. WPS < 1,500 feet from DOAA
- ☐ iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- ☐ v. WPS within a Floodplain
- ☐ vi.aa. WPS within a surface water supply area
- ☐ vi.bb. WPS < 2,640 feet from Type III or GUDI well
- ☐ vii. WPS within/immediately upgradient of wetland/riparian corridor
- ☐ viii. WPS within HPH and CPW did not waive
- ☐ ix. Operator using Surface bond
- ☐ x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: ☐

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

< No row provided >

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: CPX Piceance Holdings, LL Phone: (713) 554-9031

Address: 34 S. Wynden Dr. Fax:

Address: Suite 240 Email: nick@cpxpiceance.com

City: Houston State: TX Zip: 77056

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[X] The Operator/Applicant is the surface owner.

[ ] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

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

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	37	Oil Tanks	0	Condensate Tanks	1	Water Tanks	7	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	0
Pump Jacks	0	Separators	36	Injection Pumps	7	Heater-Treaters	1	Gas Compressors	0
Gas or Diesel Motors	5	Electric Motors	9	Electric Generators	5	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	1	Flare	0	Enclosed Combustion Devices	1
Meter/Sales Building	0	Pigging Station	1			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Salt Water Disposal Injection Pumps	2
Low Pressure Knock-out Vessel	1
High Pressure Knock-out Vessel	1
Instrument Air Skid	1
Blowdown Tank	1
Condensate Transfer Pump	1
Salt Water Disposal Filters	2
Chemical Injection Pump	7
Chemical Storage Tanks	7
Produced Water Transfer Pump	1
Salt Water Disposal Charge Pumps	2

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Water Pump	1
Low Pressure P-Tank Flowback	1
High Pressure 4-Phase Separator	2
Produced Water Tank	3
Enclosed Combustion Device	1

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Existing off-location flowlines between Well Pad 25A and Pad 2 Tanks: 12" steel natural gas flowline; 2" steel condensate flowline; 8" flexsteel bidirectional water flowline.
Proposed off-location flowlines between existing Well Pad 36A and Well Pad 25A: 12" steel natural gas flowline; 2" steel condensate flowline; 5" flexpipe bidirectional water flowline.
Proposed on-location 2" flowlines from well to separator, 2" dump lines from separators to storage tanks, gunbarrel tank, condensate tank.

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	2800	Feet	S					
Residential Building Unit (RBU):	5280	Feet	NW	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280	Feet	NE	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	NE					
Public Road:	2540	Feet	NE					
Above Ground Utility:	5280	Feet	N					
Railroad:	5280	Feet	N					
Property Line:	2070	Feet	N					
School Facility:	5280	Feet	N					
Child Care Center:	5280	Feet	NE					
Disproportionately Impacted (DI) Community:	5280	Feet	E					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	E	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

0-500 feet **501-1,000 feet** **1,001-2,000 feet**

Building Units	0	0	0
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 5.50

Size of location after interim reclamation in acres: 1.80

Estimated post-construction ground elevation: 9129

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids 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:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☒ Rangeland ☒ Forestry ☐ Recreation ☒ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

CPX Piceance privately owns Tepee Park Ranch (TPR) and the Oil and Gas Location. TPR is operated by CPX predominantly for the exploration and development of natural gas.

Describe the Relevant Local Government's land use or zoning designation:

The zoning designation is Rural. Oil and gas drilling and production is a use by right in areas zoned Rural by Garfield County.

Describe any applicable Federal land use designation:

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land:	☐ Irrigated	☐ Non-Irrigated	☐ Conservation Reserve Program (CRP)	
Non-Crop Land:	☒ Rangeland	☒ Forestry	☐ Recreation	☒ Other
Subdivided:	☐ Industrial	☐ Commercial	☐ Residential	

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

Natural gas development

Reference Area Latitude: 39.405040 Reference Area Latitude: -107.833812

Provide a list of plant communities and dominant vegetation found in the Reference Area.

Plant Community	Dominant vegetation
Forest Land	Aspen, Kentucky bluegrass, Blue wildrye, Red baneberry, Porter's licorice-root, Tall ragwort, Fendler's meadow-rue, Columbian monkshood, Thimbleberry, Tall fleabane, Richardson's geranium, Mountain brome

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 338B—Wetopa-Doughspon-Echemoor families complex, 5 to 40 percent slopes

NRCS Map Unit Name: 104A—Haplocryolls-Cryaquolls complex, 0 to 15 percent slopes

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 3128 Feet S

Spring or Seep: 5280 Feet NE

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 80 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Beaver Creek is an expression of groundwater and is approximately 80 feet lower in elevation than the Working Pad Surface. Potholing on the Working Pad Surface confirmed that no groundwater was encountered at a depth of 19.5 feet.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 1440 Feet NE

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 1640 Feet S

Provide a description of the nearest downgradient surface Waters of the State:

Mapped NWI forested shrub wetland

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

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

[X] Federal (FEMA) [X] State [X] County [ ] Local

[ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? No

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

[X] This location is included in a Wildlife Mitigation Plan

[ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.

[ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

[ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.

[ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.

[ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

[X] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: 05/27/2021

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

[X] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.

☐ The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.

☒ The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.

☐ The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.

☐ The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.

☐ The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.

☒ The applicant has obtained a Rule 1202.a CPW waiver.

☐ The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

High Priority Habitat (list all that apply)	Oil and Gas Location	Access Road	Utility or Pipeline Corridor
1202.c.(1).R - Cutthroat trout habitat and others	x	x	x

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

Compensatory Mitigation is not required for this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

Compensatory Mitigation is not required for this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No	Target Species	BMP Type	Description
1	CUTTHROAT TROUT	Wildlife - Minimization	• The operator will contain flowback and stimulation fluids in tanks that are placed on a Working Pad Surface in an area with downgradient perimeter berming. • The operator will construct lined containment devices pursuant to Rule 603.o. around any new condensate and produced water storage tanks. There will be no crude oil storage on the well pad. • During drilling and completion operations, the operator will inspect the location daily. • The operator will maintain adequate spill response equipment on the location during drilling and completion operations. • There will be no construction or utilization of fluid pits.

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 11

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [ ] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [ ] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [ ] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [ ] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c

- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

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

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- [ ] 304.b.(1). Local Government Siting Information
- [ ] 304.b.(2). Alternative Location Analysis
- [ ] 304.b.(3). Cultural Distances
- [ ] 304.b.(4). Location Pictures
- [ ] 304.b.(5). Site Equipment List
- [ ] 304.b.(6). Flowline Descriptions
- [ ] 304.b.(7). Drawings
- [ ] 304.b.(8). Geographic Information System (GIS) Data
- [ ] 304.b.(9). Land Use Description
- [ ] 304.b.(10). NRCS Map Unit Description
- [ ] 304.b.(11). Best Management Practices
- [ ] 304.b.(12). Surface Owner Information
- [ ] 304.b.(13). Proximate Local Government
- [ ] 304.b.(14). Wetlands
- [ ] 304.b.(15). Schools and Child Care Centers
- [ ] 304.c.(1). Emergency Spill Response Program
- [X] 304.c.(2). Noise Mitigation Plan
- [X] 304.c.(3). Light Mitigation Plan
- [ ] 304.c.(4). Odor Mitigation Plan
- [ ] 304.c.(5). Dust Mitigation Plan
- [ ] 304.c.(6). Transportation Plan
- [ ] 304.c.(7). Operations Safety Management Program
- [ ] 304.c.(8). Emergency Response Plan
- [ ] 304.c.(9). Flood Shut-In Plan
- [ ] 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- [ ] 304.c.(11). Waste Management Plan
- [ ] 304.c.(12). Gas Capture Plan
- [ ] 304.c.(13). Fluid Leak Detection Plan
- [ ] 304.c.(14). Topsoil Protection Plan
- [ ] 304.c.(15). Stormwater Management Plan
- [ ] 304.c.(16). Interim Reclamation Plan
- [ ] 304.c.(17). Wildlife Plan
- [ ] 304.c.(18). Water Plan
- [ ] 304.c.(19). Cumulative Impacts Plan
- [ ] 304.c.(20). Community Outreach Plan
- [ ] 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments

CPX Piceance Holdings (CPX) proposes the continued development of the existing Well Pad 25A on Tepee Park Ranch (TPR) .TPR is privately owned and operated by CPX, predominantly for the exploration and development of natural gas. The well pad contains two producing natural gas wells. A third well is drilled but uncompleted. It is proposed for conversion to a UIC well for disposal of flowback and produced water generated on TPR. In addition:
1. Well Pad 25A has been established and stabilized since 2008.
2. The well pad represents a centralized, continued use of an existing location, access, and flowlines without creating new soil disturbance and habitat fragmentation from relocating the well pad.
3. Wells will be drilled using a closed-loop drilling system and water-based mud. Completions will use recycled produced water from a third-party operator so that 97% of water use will be recycled water.
4. Production tanks and flowlines will be continuously monitored using a SCADA platform for remote monitoring, alerting, and shut-in capabilities.
3. Lined steel secondary containment is sized to contain 150% of the largest tank to avoid impacts to the environment.
4. The well pad surfaces and berms are hardened and stable to avoid erosion. The berms are 2' high and compacted to 95% soil/moisture density. They are vegetated with 80% cover on the outside slopes.
5. An engineered 6" drain on the center of the well pad flows to a perimeter trench and a storm water catchment basin to avoid uncontrolled storm water runoff.
6. During production, takeaway capacity for natural gas and condensate will be provided by existing buried natural gas and condensate flowlines. Produced water and flowback will be disposed of using the on-location UIC well to avoid truck trips on and off the location.

Existing Well Pad 36A is proposed to be used as a remote frac support pad for SIMOPs operation. Notes on the Layout Drawing for Well Pad 36A submitted with the Pad 25A Form 2A state that its use would need to be reviewed and authorized under a separate OGDP approved by the Commission. Alternatively, the same frac support equipment configuration would be located instead on existing Well Pad 25A under non-SIMOPs completions. Well Pad 36A remote frac support details, drawings, and diagrams are shown on the Pad 25A Form 2A Facility Layout Drawings, Process Flow Diagrams, Fluid Leak Detection Plan, Stormwater Management Plan, and Water Plan. Well Pad 36A received CPW's written waiver and variance recommendation for Rule 1202.c.(1).R HPH on June 18, 2021, which was reaffirmed on July 13, 2022.

New Temporary Water Support Pad 25B is proposed to locate modular large volume tanks during well completions. Two types of water storage are planned during completions. (1) Recycled produced water to use during well completions. (2) Water from well completions to be used for future well completions or stored for disposal in a proposed Class II Underground Injection Control well on CPX's existing Well Pad 25A. Notes on the Layout Drawing for Pad 25B submitted with the Pad 25A Form 2A state that its use would need to be reviewed and authorized under a separate OGDP approved by the Commission. The Hearing Application for Pad 25B was submitted on July 28, 2022 with OGDP/Form 2A submittal upon issuance of the hearing docket number. Pad 25B temporary water support details, drawings, and diagrams are shown on the Pad 25A application Facility Layout Drawings, Process Flow Diagrams, Fluid Leak Detection Plan, Stormwater Management Plan, and Water Plan. Pad 25B is not located in HPH. Pad 25B received CPW's written agreement with BMPs and other avoidance measures on June 14, 2022 under Rule 1202.c.(2).C for the temporary reroute of an approximately 310' portion of existing road in Rule 1202.c.(1).R HPH.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 03/31/2022 Email: nick@cpxpiceance.com

Print Name: Nicholas Kurtenbach Title: Principal

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: _____

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.

Condition of Approval

COA Type	Description
0 COA	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	CPX will submit the finalized water sharing agreement with TEP pursuant to Rule 905.c.(5).
2	General Housekeeping	• Trash will be removed for disposal as domestic solid waste at a permitted waste disposal facility. • Tanks and containers will be labeled according to requirements of Rule 605.h. • The location will use bear-proof containers for food-related waste. • Any chemicals used will be kept to a minimum; • Any chemical or hydrocarbon spills will be cleaned up immediately in accordance with established company procedures; • All materials will be stored in a neat and orderly manner in their appropriate containers • CPX will follow manufacturers' recommendations and company policies for proper use and disposal of products. • Unused chemicals will be sent back to the chemical provider or will be used at another drilling site and will not be stored on the location.
3	Wildlife	Cutthroat Specific Protection Measures • To protect against spills from the well pad, existing well pad fill slopes have 2-foot-high high earthen berms compacted to 95 percent soil/moisture density. The outside slopes of the berms have 80 percent vegetative cover. The berms are stable with high structural integrity. • To protect against spills from tanks, steel secondary containment is sized to 150 percent of the largest tank. The secondary containment liner is sprayed in to optimize its seal. Spill response material is permanently stored on Well Pad 25A. • To protect against runoff, there is no uncontrolled stormwater on the well pad. The well pad has a 6-inch drain in the center. The drain is piped outside of the berm to a trench. The trench drains to a catchment basin. Solids settle in the catchment basin for removal. The stormwater evaporates. • To protect against erosion, the road has a borrow ditch on the upslope side. Stormwater is diverted to 18 to 24-inch culverts spaced at 600-foot intervals. The frequent culverts prevent erosion by avoiding long runs of stormwater and slowing velocity. • To protect Beaver Creek, its road crossing was designed in consultation with the U.S. Army Corps of Engineers. The crossing is an open bottom arch with concrete footers to maintain the streambed integrity. • To protect Beaver Creek, process equipment and tank loadout were relocated to Pad 2, approximately 3 miles away. • To protect Beaver Creek, the existing water pipeline was designed to be bidirectional. Delivering freshwater to TPR by pipeline eliminates haul traffic for water delivery. • To minimize potential for undetected spills, runoff, and pipeline leaks, personnel are on site approximately 5 days/week. Field staff live within 15 minutes of the well pads, which facilitates consistent on-site presence. • Pipelines are monitored for pressure loss and are tested annually. • The operator will contain flowback and stimulation fluids in tanks that are placed on a Working Pad Surface in an area with downgradient perimeter berming. • The operator will construct lined containment devices pursuant to Rule 603.o. around any new condensate and produced water storage tanks. There will be no crude oil storage on the well pad. • During drilling and completion operations, the operator will inspect the location daily. • The operator will maintain adequate spill response equipment on the location during drilling and completion operations. • There will be no construction or utilization of fluid pits. General Wildlife Protection Measures • CPX will inform and educate employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife. • CPX will consolidate and centralize fluid collection and distribution facilities to minimize impact to wildlife. • CPX will adequately size infrastructure and facilities to accommodate both current and future gas production. • CPX will design road crossings of streams at right angles to all riparian corridors and streams to minimize the area of disturbance. • CPX will implement fugitive dust control measures. • CPX will install screening or other devices on the stacks and on other openings of

		heater treaters or fired vessels to prevent entry by migratory birds. • CPX will minimize rig mobilization and demobilization by completing or re-completing all wells from a given well pad before moving rigs to a new location. • CPX will to the extent practicable, share and consolidate new corridors for pipeline rights-of-way to minimize surface disturbance. • CPX will engineer new pipelines to reduce field fitting and reduce excessive right-of-way widths and reclamation. • CPX will mow or brush hog vegetation where appropriate, leaving root structure intact, instead of scraping the surface, where allowed by the surface owner. • CPX will limit access to oil and gas access roads where approved by surface owners, surface managing agencies, or local government. 12 Post speed limits and caution signs to the • CPX will extent allowed by surface owners, federal and state regulations, local government, and land use policies. • CPX will use wildlife-appropriate fencing where acceptable to the surface owner. • CPX will use topographic features and vegetative screening to create seclusion areas, where acceptable to the surface owner. • CPX will use remote monitoring of well production to the extent practicable. • CPX will reduce traffic associated with transporting drilling water and produced liquids through the use of pipelines, large tanks, or other measures. • CPX will store and stage emergency spill response equipment at strategic locations along perennial water courses so that it is available to expedite effective spill response. • CPX will construct all crossings at right angles to the stream. • CPX will install automated emergency response systems (e.g., high tank alarms, emergency shutdown systems). • CPX will avoid dust suppression activities within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.	
4	Storm Water/Erosion Control	Structural • The well pad stormwater control system will be maintained. It consists of a 6-inch-diameter drain at the center of the well pad, which is piped to a trench and stormwater catchment basin. • The well pad fill slopes will be controlled using the 2-foot-high earthen berms, compacted to 95 percent soil/moisture density. • Tank area secondary containment will be maintained using a lined steel containment system sized to contain 150 percent of the largest tank. • Temporary equipment and materials used during well drilling and completion will have liners and secondary containment. • The access road will be maintained with blading, a borrow ditch on the upslope side of the road to diver stormwater, and culverts placed along the roadway to channel stormwater. CPX Piceance Holdings, LLC Stormwater Management Plan Well Pad 25A 10 May 2022 • The flowline trench will be bored under Beaver Creek. The trench will be excavated under the existing culverts within the roadway at other drainage and intermittent stream crossings. Stream flows will not be diverted. Stream bottoms will not be disturbed. • Straw wattles will be staked adjacent to the windrowed soil excavated from the flowline trench to prevent runoff from loose soils. Non-Structural • Ingress, egress, and parking will occur in designated areas on the well pad. • Waste materials will be bagged or containerized to avoid blowing and contact with precipitation. • Vehicles and equipment will be monitored for leaks during well development. • The well pad will be inaccessible to the public to prevent unauthorized access and excessive wear on access roads. • Spill response booms and absorbents will be containerized and available on site. • During well drilling and completion, stormwater monitoring will occur daily. Areas that require correction for stormwater control will be addressed or repaired promptly. • During production, stormwater inspections will be performed at least every 14 days and every 30 days after interim reclamation. Inspections will occur more frequently after significant storm or snowmelt events, in accordance with CDPHE requirements. • Interim reclamation and revegetation will be performed during the first growing season after well drilling and completion.	
5	Material Handling and Spill	• A pre-spud inspection will be performed prior to drilling a new well. Hoses,	

	Prevention	connections, tanks, pumps, and other fluid circulating equipment will be checked to ensure it is properly installed and will not leak prior to use. Equipment that has failed or will leak will be removed from service and replaced. • Fluid circulating equipment will be visually inspected before shifts to ensure it is properly connected and there are no leaks. • Site personnel will be trained in spill prevention, response, and response equipment on at least an annual basis. Training will include how spills or releases will be investigated, controlled, and contained in accordance with Rule 912.a. • If a spill or release meets criteria in Rule 912.b, it will be reported as specified in the 900 Series Rules. • Site personnel will be trained to conduct equipment and frac line inspections, including AVO inspections. • Equipment and frac lines will be monitored daily during well drilling and completion for signs of drips, leaks, or spills, which will be corrected promptly. • Flowlines will be installed consistent with Rule 1102. In accordance with Rule 1104, before a flowline is put into service, it will be pressure tested to maximum pressure and AVO leak detection. • CPX will conduct daily AVO inspections during pre-production and monthly AVO inspections during production on Well Pad 25A. • CPX will conduct annual flowline integrity testing in accordance with Rule 1104. • An earthen berm will be maintained around the perimeter of the well pad. • Drilling mud will be fresh water bentonite-based mud. • Drilling fluid products will be stored on location off the ground and in containment sheltered from the weather. • Fuel storage will have secondary containment underneath fuel pump, fittings, and hose connections. • A closed loop solids control system will be used with no reserve pits. • Drill cutting storage will be stockpiled on the edge of the location against the cut slope of the pad and segregated from all topsoil and undisturbed vegetation. Appropriate stormwater drainage will be in place, and the cuttings storage area will have a berm at the base to prevent any stormwater run-off from exiting the pad or spreading to the rest of the pad outside of the designated area.
6	Dust control	• Employees and contractors will observe posted speed limits on public roads and a 25 mile per hour speed limit on TPR access roads. • Regular inspection will occur for the access road for evidence of inadequate drainage and formation of potholes. • Grading, blading, and filling potholes will be performed to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion. • Spot graveling will be used to avoid erosion, formation of silts, and to stabilize surfaces for truck travel. • Well pad construction is complete. Further disturbance is not anticipated. Blowing soil and failure of the soil to stabilize and form a crust during interim reclamation will indicate that a dust suppression BMP is needed. In that event, fresh water from an approved water source will be used to wet the surface for control of fugitive dust on the well pad, access road, or pipeline corridor. • Areas not needed for production will be reclaimed in accordance with Rule 1003. • Fresh water from an approved water source will be used on disturbed surfaces when needed to minimize fugitive dust. • The soil stockpile will be mounded and maintained to prevent loose soils and promote vegetative growth. • Vegetation will be allowed to establish, with hydroseed and mulch, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity. • A water truck will be used to apply freshwater on access roads to minimize fugitive dust. Proppant • Proppant will be hauled in closed containers and offloaded within secondary containment around the proppant storage silos.

7	Noise mitigation	• Any operations involving the use of a drilling rig, workover rig, or fracturing and any equipment used in the drilling, completion or production of a well are subject to and will comply with the Agricultural maximum permissible noise levels in Rule 423.a.(2).A. • If a noise complaint is made to either CPX directly, the COGCC, or the local government, and CPX is notified of the complaint, noise levels will be measured within 48 hours of receipt of the complaint; CPX will contact the concerned party (if contact information is available) to discuss the complaint and the results of the noise measurements.	
8	Emissions mitigation	• Maintain equipment and vehicles in proper working condition to minimize noise. • Cast lights downward on the operations during well drilling and completions. • Contain flowback and produced water in enclosed tanks. Vapors will be controlled using an enclosed combustor. • Implement a leak detection and repair (LDAR) program using audio, visual, and olfactory (AVO) monitoring for leak and spill detection. • Maintain and periodically test tank seals to ensure that they provide the required back pressure and prevent emissions. • Use automated tank gauges to gauge liquids without opening the thief hatch. • Commit to connecting to a gas gathering system after well drilling and completions.	
9	Odor mitigation	• Water/bentonite-based mud (WBM) drill cuttings are circulated up the annulus and through the rig flowline to a mud-gas separator, where any gas entrained in the mud is separated and flows off the separator's overhead to an internal combustion device; the drilling cuttings then flow with the drilling mud over two sets of drying shakers and then through a centrifuge to further dry the cuttings; the dried cuttings are placed into steel bins where they are temporarily stored on location prior to placement into the cuttings trench; • If odor complaints are received and it is determined that they are caused by the drilling fluids, then an odor neutralizing agent or similar product will be added to the system to eliminate the odor; and • Hydrocarbon odors from production facilities will be minimized by keeping produced fluid hydrocarbons and natural gas contained within pipes, separators, tanks, and combustors; all tanks will be sealed with thief hatches and gaskets; tank vapors will be captured with properly sized piping and combustors.	
10	Drilling/Completion Operations	Waste Handling • Recycled produced water will be used to support CPX completions operations. • A closed loop drilling system will be used to reduce the volume of waste. • Bulk containers will be used instead of drums to reduce waste. • Waste streams will not be commingled such that they no longer qualify as solid waste or E&P exempt waste. • A designated area will be identified and controlled for waste storage. • Waste will be segregated and stored according to its waste classification. • Wastes will be stored in containers or on lined containment that are chosen for compatibility and checked for leaks or integrity problems. Examples of containment include but are not limited to steel tanks, lined berms, lined containment, plastic totes, drums, etc.	
11	Drilling/Completion Operations	Drill Cuttings Management and Sampling Protocols: • All cuttings generated during drilling will be kept in a bermed portion of the well pad prior to disposition; •The moisture content of any water/bentonite-based drilling mud (WBM) generated cuttings will be minimized through good engineering practices and mechanical processes to prevent the accumulation of liquids greater than de minimis amounts; • Solids control and separation equipment will be utilized to separate WBM-generated cuttings solids from liquids (water/bentonite drilling mud); • In the event that drill cuttings analytically demonstrate constituents above able 915-1 standards, the cuttings will be remediated prior to interim reclamation activities to levels below all applicable standards of Table 915-1; • No liners will be used or disposed of in the cuttings trench; • No offsite disposal of water-based bentonite drilling cuttings to another oil and gas location or third party commercial disposal facilities shall occur without prior approval of an amended Waste Management Plan specifying disposal location and waste characterization method; • Contingency Sampling of the water/bentonite based drill cuttings will occur regardless of whether the original "background" or "baseline" samples collected from each well drilled are compliant with Table 915-1. The operator will need to close out the cuttings	

		trench with a Form 27. The operator will propose the number of discrete samples, the locations, and depth intervals for the confirmation samples. The depth intervals will be selected to provide sufficient coverage between 0 and 19 feet below the final top surface of the cuttings within the trench. Upon approval of the Form 27, CPX will collect the proposed samples and analyze them for the Table 915-1 constituents.
12	Interim Reclamation	Topsoil Protection: Short-Term • There will be no additional vegetation removal to prepare the Well Pad 25A Working Pad Surface for well development. • The operator will salvage and segregate topsoil for the flowline trench based on soil characteristics of texture, color, structure, and consistency. • Salvaged topsoil will be windrowed along the flowline trench. It will be protected from stormwater runoff using anchored straw wattles. It will be replaced in the trench in the order that it was excavated. • Windrowed soil along the flowline trench will be protected from contamination by segregating the area from the driving surface using staking and straw wattles. Long-Term • The soil stockpile will be protected from compaction by continuing to isolate it from equipment operating on the Working Pad Surface. The stockpile will be designated with staking and flagging during well development. • The stockpile will continue to be protected from wind degradation and erosion using a stable 2:1 slope to prevent loose soils while preventing stormwater from ponding or forming runnels on the stockpile. • Existing vegetation established on the stockpile will stabilize it, outcompete weeds, and promote soil microbial activity. • The stockpile will be monitored and managed for weeds during weed management monitoring conducted at the Oil and Gas Location by the field operator.
13	Interim Reclamation	• Timing – Interim reclamation will begin within 6 months after the last well is completed and the site is transitioned from well completions to production operations. • Waste Disposal – CPX will properly characterize and dispose of waste in accordance with its Waste Management Plan. • Recontouring - Disturbed areas will be recontoured to blend with the pre-disturbance surface and restore natural drainage patterns. • Topsoil - Topsoil stored on the location will be restored on the reclaimed area. Salvaged topsoil will be replaced and contoured to maximize erosion control and soil stability. • Erosion control – Erosion controls will be maintained to prevent stormwater run on, runoff, and erosion. Stormwater controls during production are shown on the attached Facility Layout Drawing. • Seedbed Preparation - Gravel or surface material will be removed or redistributed during interim reclamation. Areas to be reclaimed will be cross ripped to an estimated depth of 18 inches unless restrictive features are encountered at a shallower depth. • Seed mix – CPX will broadcast or hydroseed the U.S. Forest Service Native Plant Materials Program certified weed-free recommended seed mix. • Weed control – The location will be monitored for the presence of invasive weeds. Invasive weeds will be treated to prevent them from establishing or spreading. • Access – Unauthorized access will continue to be restricted by the locked gate to TPR at the northern end of the Tepee Park Ranch road. CPX Piceance Holdings, LLC Interim Reclamation Plan TPR Well Pad 25A 6 May 2022 • Monitoring – The location will be monitored for vegetative success. It will be reseeded where needed to establish 80 percent of pre-disturbance cover.

Total: 13 comment(s)

Attachment List

Att Doc Num	Name
2158326	EXCEPTION REQUEST LETTER
2158327	MULTI PAD FLOWLINE EXHIBIT
2201001	CPW WAIVER RULE 1202.a.(3).
2201002	CPW WAIVER RULE 1202.c.(1).R.
2201003	CPW WAIVER RULE 304.b.(2).B.viii.
4222002	LAYOUT DRAWINGS
4222004	CPW CONSULTATION RULE 1202.c.(2).C.
402860020	FORM 2A SUBMITTED
402988785	CPW CONSULTATION
402988791	LOCATION PICTURES
402988794	PRELIMINARY PROCESS FLOW DIAGRAMS
402988795	REFERENCE AREA PICTURES
402988796	LOCATION DRAWING
402988798	WILDLIFE HABITAT DRAWING
402988800	ACCESS ROAD MAP
402988804	REFERENCE AREA MAP
402988806	NRCS MAP UNIT DESC
403019725	LOCATION AND WORKING PAD GIS SHP
403020811	CONSULTATION SUMMARY
403020822	HYDROLOGY MAP
403042749	GEOLOGIC HAZARD MAP
403042792	RELATED LOCATION AND FLOWLINE MAP
403042799	NRCS MAP UNIT DESC
403042800	CULTURAL FEATURES MAP
403042803	LESSER IMPACT AREA EXEMPTION REQUEST
403044346	DIRECTIONAL WELL PLAT

Total Attach: 26 Files

General Comments

User Group	Comment	Comment Date
Final Review	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	09/18/2022
Final Review	With concurrence from Operator: - Attached the Exception Request Letter for Rule 1202.c.(1).R - Attached the Multi Pad Flowline Exhibit	09/17/2022
OGLA	Form 2A for the TPR 25A has been placed back to" IN PROCESS" since TPR 25B has been pushed to "IN PROCESS" and Hearing is set for both OGDPs on September 21, 2022.	08/22/2022
OGLA	Form placed on HOLD by Permitting Manager; OGDP may require the addition of the proposed Temporary Water Support 25B Location into the OGDP application.	08/01/2022
OGLA	Attached revised Waste Management Plan and Wildlife Mitigation Plan.	08/01/2022
OGLA	Placed the following Best Management Practices (selected from the submitted plans and supplemental BMPs submitted by CPX) on the Form 2A: planning, general housekeeping, wildlife protection, stormwater/erosion control, material handling and spill prevention, dust control, noise mitigation, emissions mitigation, odor mitigation, drilling/completion operations, and interim reclamation.	07/24/2022
OGLA	Attached revised Layout Drawings attachment.	07/24/2022
CPW	CPW staff visited this location on 5/27/2021. During this site visit, it was determined that a waiver for Rule 1202.c.(1).R., which affects portions of the pad, may be appropriate. After the site visit, CPW conducted a review of the spill protection plan, stormwater protection plan, stream protection plan, inspection schedule, and remote monitoring capabilities. CPX has proposed a list of 10 Best Management Practices (BMPs) to avoid adversely impacting Beaver Creek, aquatic habitat, and the watershed. CPW issued the waiver, with the application of prescribed BMPs, per rule 309.e.(5).D on 5/6/22. CPW expects these measures to be sufficient. Construction at a new location, instead of continued use of Pad 25A, could cause more undesired disturbance and pose more risk to High Priority Habitats and the watershed. CPW finds the measures contained in the presented materials adequate to protect against potential adverse impacts to the unnamed drainages identified in the Hydrology Exhibit, as they relate to fisheries and wildlife. CPW also does not have concerns with the siting of chemical and/or fuel storage facilities within 500 feet of these drainages from a fisheries and wildlife standpoint. The nearest waterways are ephemeral in nature and are not directly down-gradient from the pad location. It should be understood that CPW does not have jurisdictional authority over wetlands and other waters of the U.S., as defined by the Environmental Protection Agency, Army Corps of Engineers and/or the Colorado Department of Public Health and Environment. This assessment is only based on CPW's understanding of how this development could potentially impact wildlife and fish associated with the identified water features and CPW's authority as defined by COGCC's regulations. Approved By: Danielle Neumann Date: June 15, 2022	06/15/2022
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	05/31/2022
OGLA	Rule 304.d Lesser Impact Area exemption requested from Rule 304.c.(2) Noise Mitigation Plan. The Director granted the exemption on 4/26/22 due to no proximate High Priority Habitats that may be impacted and no proximate Residential Building Units. Potential noise impacts may be addressed by BMPs on the Form 2A.	04/27/2022
OGLA	Rule 304.d Lesser Impact Area exemption requested from Rule 304.c.(3) Light Mitigation Plan. The Director granted the exemption on 4/26/22 due to no proximate High Priority Habitats that may be impacted and no proximate Residential Building Units. Potential light impacts may be addressed by BMPs on the Form 2A.	04/27/2022

Total: 11 comment(s)

Public Comments

No public comments were received on this application during the comment period.

FORM 2A Rev 05/22

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: 403077002

Date Received: 08/02/2022

Oil and Gas Location Assessment

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:
OGDP ID:
Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location #

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
220800201		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

<No existing OGDP number provided>

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID #

[X] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.

[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).

[ ] This Location includes a Rule 309.e.(2).E variance request.

[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 10639
Name: CPX PICEANCE HOLDINGS LLC
Address: 34 S WYNDEN DR STE 240
City: HOUSTON State: TX Zip: 77056

Contact Information

Name: Nicholas Kurtenbach
Phone: (713) 554-9031
Fax: ( )
email: nick@cpxpiceance.com

FINANCIAL ASSURANCE FOR THIS LOCATION (check all that apply)

[X] Plugging, Abandonment, and Reclamation 20160118

[ ] Centralized E&P Waste Management Facility

[ ] Gas Gathering, Gas Processing, and Underground Gas Storage Facilities

[ ] Surface Owner Protection Bond.

Federal Financial Assurance

[ ] In checking this box, the Operator certifies that it has provided or will provide at least this amount of Financial Assurance to the federal government for one or more Wells on this Location.

Amount of Federal Financial Assurance $

LOCATION IDENTIFICATION

Name: Temporary Water Support Pad Number: 25B

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: SWSE Section: 25 Township: 7S Range: 94W Meridian: 6 Ground Elevation: 9069

Latitude: 39.404901 Longitude: -107.831352

GPS Quality Value: 2.5 Type of GPS Quality Value: PDOP Date of Measurement: 10/22/2021

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 #
Production Facilities Location serves Well(s)	334457	402860020

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: GARFIELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. No

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? No

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location:

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Sheryl Bower Contact Phone: (970) 945-1377

Contact Email: sbower@garfield-county.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? No

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- ☐ i. WPS < 2,000 feet from RBU/HOBU
- ☐ ii. WPS < 2,000 feet from School/Child Care Center
- ☐ iii. WPS < 1,500 feet from DOAA
- ☐ iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- ☐ v. WPS within a Floodplain
- ☐ vi.aa. WPS within a surface water supply area
- ☐ vi.bb. WPS < 2,640 feet from Type III or GUDI well
- ☐ vii. WPS within/immediately upgradient of wetland/riparian corridor
- ☐ viii. WPS within HPH and CPW did not waive
- ☐ ix. Operator using Surface bond
- ☐ x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: ☐

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

< No row provided >

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: CPX Piceance Holdings, Phone: (713) 554-9031

Address: 34 S. Wynden Dr. Fax:

Address: Suite 240 Email: nick@cpxpiceance.com

City: Houston State: TX Zip: 77056

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[X] The Operator/Applicant is the surface owner.

[ ] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [ ] Fee [ ] State [ ] Federal [ ] Indian

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

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	0	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	12
Pump Jacks	0	Separators	0	Injection Pumps	0	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	2	Electric Motors	0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	0	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
125-kW Generators	2
110-HP Fluid Transfer Pumps	2

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

CPX will use 4" temporary steel surface lines for operation as a remote water support pad during well completions. This temporary water support pad will not contain wells. Gas gathering for production is not applicable.

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	3040	Feet	S					
Residential Building Unit (RBU):	5280	Feet	NW	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280	Feet	NE	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	NE					
Public Road:	2280	Feet	NE					
Above Ground Utility:	5280	Feet	N					
Railroad:	5280	Feet	N					
Property Line:	2020	Feet	N					
School Facility:	5280	Feet	N					
Child Care Center:	5280	Feet	NE					
Disproportionately Impacted (DI) Community:	5280	Feet	E					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	E	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	0	0
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 4.13

Size of location after interim reclamation in acres: 1.83

Estimated post-construction ground elevation: 9066

DRILLING PROGRAM

Will a closed-loop drilling system be used? _____

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? _____ If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: _____

Will salt based (>15,000 ppm Cl) drilling fluids be used? _____

Will oil based drilling fluids be used? _____

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: _____ Drilling Fluids Disposal Method: _____

Cutting Disposal: _____ Cuttings Disposal Method: _____

Other Disposal Description:

Beneficial reuse or land application plan submitted? _____

Reuse Facility ID: _____ or Document Number: _____

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

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☐ Rangeland ☐ Forestry ☐ Recreation ☒ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

CPX privately owns Tepee Park Ranch (TPR) and the proposed location. TPR is operated by CPX predominantly for the exploration and development of natural gas.

Describe the Relevant Local Government's land use or zoning designation:

The zoning designation is Rural. Oil and gas drilling and production is a use by right in areas zoned Rural by Garfield County.

Describe any applicable Federal land use designation:

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☐ Rangeland ☐ Forestry ☐ Recreation ☒ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):

Natural gas development

Reference Area Latitude: 39.405040 Reference Area Latitude: -107.833812

Provide a list of plant communities and dominant vegetation found in the Reference Area.

Plant Community	Dominant vegetation
Forest Land	Aspen, Kentucky bluegrass, Blue wildrye, Red baneberry, Porter's licorice-root, Tall ragwort, Fendler's meadow-rue, Columbian monkshood, Thimbleberry, Tall fleabane, Richardson's geranium, Mountain brome

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 220B: Angostura Family, 5 to 40 percent slopes

NRCS Map Unit Name: 338B: Wetopa-Doughspon-Echemoor families complex, 5 to 40 percent slopes

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 3312 Feet S

Spring or Seep: 5280 Feet NE

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 40 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Beaver Creek is an expression of groundwater and is approximately 40 feet lower in elevation than the Working Pad Surface. There will be no pits or trenches on the location.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 620 Feet E

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 2640 Feet NE

Provide a description of the nearest downgradient surface Waters of the State:

Perennial stream

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

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

[X] Federal (FEMA) [ ] State [X] County [ ] Local

[ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? No

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

[X] This location is included in a Wildlife Mitigation Plan

[ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.

[ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

[ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.

[ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.

[ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

[X] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: 06/02/2022

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

[ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.

[ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.

[ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.

[ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.

☐ The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.

☐ The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.

☐ The applicant has obtained a Rule 1202.a CPW waiver.

☐ The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

High Priority Habitat (list all that apply)	Oil and Gas Location	Access Road	Utility or Pipeline Corridor
1202.c.(1).R - Cutthroat trout habitat and others		x	

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

A Compensatory Mitigation Plan is not required for this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

A Compensatory Mitigation Plan is not required for this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? No

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 11

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [ ] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [ ] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [ ] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [ ] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number:

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

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- [ ] 304.b.(1). Local Government Siting Information
- [ ] 304.b.(2). Alternative Location Analysis
- [ ] 304.b.(3). Cultural Distances
- [ ] 304.b.(4). Location Pictures
- [ ] 304.b.(5). Site Equipment List
- [ ] 304.b.(6). Flowline Descriptions
- [ ] 304.b.(7). Drawings
- [ ] 304.b.(8). Geographic Information System (GIS) Data
- [ ] 304.b.(9). Land Use Description
- [ ] 304.b.(10). NRCS Map Unit Description
- [ ] 304.b.(11). Best Management Practices
- [ ] 304.b.(12). Surface Owner Information
- [ ] 304.b.(13). Proximate Local Government
- [ ] 304.b.(14). Wetlands
- [ ] 304.b.(15). Schools and Child Care Centers
- [ ] 304.c.(1). Emergency Spill Response Program
- [X] 304.c.(2). Noise Mitigation Plan
- [X] 304.c.(3). Light Mitigation Plan
- [ ] 304.c.(4). Odor Mitigation Plan
- [ ] 304.c.(5). Dust Mitigation Plan
- [ ] 304.c.(6). Transportation Plan
- [ ] 304.c.(7). Operations Safety Management Program
- [ ] 304.c.(8). Emergency Response Plan
- [ ] 304.c.(9). Flood Shut-In Plan
- [ ] 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- [ ] 304.c.(11). Waste Management Plan
- [ ] 304.c.(12). Gas Capture Plan
- [ ] 304.c.(13). Fluid Leak Detection Plan
- [ ] 304.c.(14). Topsoil Protection Plan
- [ ] 304.c.(15). Stormwater Management Plan
- [ ] 304.c.(16). Interim Reclamation Plan
- [ ] 304.c.(17). Wildlife Plan
- [ ] 304.c.(18). Water Plan
- [ ] 304.c.(19). Cumulative Impacts Plan
- [ ] 304.c.(20). Community Outreach Plan
- [ ] 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments	Pad 25B is proposed to be a new temporary water support pad. It will not contain wells. It will be used for modular large volume tanks during well completions. Two types of water storage are planned during completions. (1) Recycled produced water to use during well completions. (2) Water from well completions to be used for subsequent well completions or stored for disposal in a proposed Class II Underground Injection Control well on CPX's existing Well Pad 25A. Pad 25B is not located in HPH. Pad 25B received CPW's written agreement with BMPs and other avoidance measures on June 14, 2022 under Rule 1202.c.(2).C for the temporary reroute of an approximately 310' portion of existing road in Rule 1202.c.(1).R HPH. After support for well completions is finished, Pad 25B will be taken out of service. Equipment will be dismantled and removed from the location. The pad will be fully reclaimed. CPX's statewide blanket bond for plugging, abandonment, and reclamation applies to Pad 25B. Pad 25B will be covered by CPX's Rule 702 Financial Assurance Plan and any additional bonding posted by CPX needed to comply with the new 700 Series Rules. Pad 25B does not require separate bonding under Rule 703 for other oil and gas facilities and operations. Pad 25B does not require a surface owner protection bond under Rule 704.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 08/02/2022 Email: nick@cpxpiceance.com

Print Name: Nicholas Kurtenbach Title: Principal

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: _____

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.

Condition of Approval

COA Type	Description
Planning	Within seven days of installation of MLVTs, Operator will submit a Sundry Notice Form 4 listing the MLVT manufacturer or vendor, number and size of MLVTs, and the Operator's certifying statement that MLVTs will be designed and implement consistent with COGCC's June 13, 2014 MLVT Policy.
Planning	No produced or recycled water may be stored at this Location beyond three years from the commencement of facility use. If operations are not discontinued within this three year period, Operator will submit for Director approval a Form 28 E&P Waste Management Permit, addressing all the Rule 907 requirements, and provide all required financial assurance, at least 60 days prior to the 3-year anniversary of the date the first fluids enter an MLVT or other storage tank. No operations may occur after three years without a valid approved Form 28.
2 COAs	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	Air Monitoring • Per APCD requirements, CPX will implement ambient air quality monitoring on site during completion operations. • CPX will properly maintain vehicles and equipment; • Other than safety devices, CPX will use non-emitting pneumatic controllers; and • CPX will have adequate and committed pipeline capacity for all produced water.
2	Planning	CPX will submit the finalized water sharing agreement with TEP pursuant to Rule 905.c.(5).
3	General Housekeeping	• Vehicular traffic will be minimized as much as possible to reduce nuisance dust and prevent soil erosion; • Any trash generated during the project will be disposed of properly at a commercial disposal facility; • Any chemicals used will be kept to a minimum; • Any produced water spills will be cleaned up immediately in accordance with established company procedures; • All materials will be stored in a neat and orderly manner in their appropriate containers; • CPX will follow manufacturers' recommendations and company policies for proper use and disposal of products.

4	Wildlife	• Inform and educate employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife. • Consolidate and centralize fluid collection and distribution facilities to minimize impact to wildlife. • Adequately size infrastructure and facilities to accommodate both current and future gas production. • Implement fugitive dust control measures. • Minimize the duration for road construction to optimize dry weather and avoid operating equipment in wet soils. • Compact soils with heavy equipment and water during road building and cap with gravel to minimize loose soils. • Stake straw wattles into trenches during road construction to secure the wattles and prevent their movement and disintegration. • Install a borrow ditch along the side of the road. Spray the ditch using a hydroseeder and tackifier to vegetate the disturbed soils and form a vegetative filter strip. • Install check dams from 4” minus fractured shale to slow stormwater velocity and allow any sediments to drop out. • Armor sediment traps with rock at the inlets and outlets. Remove and reclaim sediment for reuse during reclamation. • Mow or brush hog vegetation where appropriate, leaving root structure intact, instead of scraping the surface, where allowed by the surface owner. • Limit access to oil and gas access roads. • Post speed limits and caution signs to the extent allowed by surface owners, federal and state regulations, local government, and land use policies. • Use topographic features and vegetative screening to create seclusion areas. • Reduce traffic associated with transporting drilling water and produced liquids through the use of pipelines, large tanks, or other measures. • Store and stage emergency spill response equipment at strategic locations along perennial water courses so that it is available to expedite effective spill response. • Avoid dust suppression activities within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river. • Site lighting shall be shielded and directed downward, inward, away from the nearby areas where wildlife may be present, and toward operations to avoid glare on nearby public roads or possible wildlife areas.	
5	Material Handling and Spill Prevention	Tank Monitoring • Operators will be on location 24/7 during completions. Operators will monitor tanks, manifolds, hoses, connections, pumps, secondary containment, the generator and fuel tank, and fluids transfer twice daily to coincide with shift changes. Between completions when there is no activity, an operator will be on location daily to monitor Pad 25B. • Each MLVT will have a float assembly to provide the volume in the tank. The operator will record the volumes daily. The data will be used to identify any fluid loss and to prevent overfilling. • Monitoring will look for signs of leaks, malfunction, or deterioration. A minor spill or leak will be treated with the spill response material maintained on site and disposed of appropriately at a disposal facility authorized to accept the waste. Tank Inspection and Maintenance: • Access to the tanks will be limited to operations personnel. • Tanks will be maintained according to the manufacturer's specifications. The vendor will provide service support, including integrity checks of tank seals. CPX will regularly change out ball valves on isolation valves. • CPX will maintain the manufacturer’s recommended freeboard in each tank. Personnel will conduct periodic testing and reinspection of equipment. The frequency will be identified in Standard Operating Procedures (SOPs) developed for Pad 25B. • Daily, personnel will inspect the tanks, appurtenances, and surrounding area for integrity. inspection will be used to indicate a malfunction or leak. Inspection will consist of the following: Listen for leaks or noise that is out of the ordinary; Look for visual signs of a fluid drip, leak, staining, or leaking around components; Look for visual signs of seeping or leaking around tanks; Check for fluids in containment;. Check valving to ensure valves are closed tight and there is no seeping or leaking. Inspect for wet spots not associated with natural conditions (rain, snow, runoff, etc.);. Check for odors not normally associated with the site. • Signs of drips, leakage, or wear will be repaired promptly with recordkeeping for the repair.	

		• Weekly, personnel will test the Minion bladder pop off control at the specified pressure and the Harpoon level indicator. • During active completions, fluid circulating equipment will be visually inspected before each shift to ensure it is properly connected and there are no leaks. • Routine inspections will be performed by qualified personnel who are knowledgeable on facility operations, the equipment, its components, and the characteristics of the material stored and transferred. • Signage for Pad 25B tanks will list the operator, emergency contact phone number, tank capacity, and contents. • Reservoir temperatures will prevent snow accumulation on the tanks. Walkways for personnel will be shoveled to maintain access between tanks. Headers and valves will be insulated. Water circulation and heat trace, if needed, will prevent freezing. Contingency Plan and Emergency Response • Pad 25B SOPs will contain a contingency plan and provisions for a root cause analysis of any findings. An Emergency Response Plan (ERP) was prepared for Pad 25B and provided to the Garfield County emergency response commander for review. Garfield County confirmed the ERP on June 21, 2022. • Four levels of control prevent potential spills from impacting surface water. • The primary control is the 4-foot-high lined synthetic muscle wall containment area sized to contain 150 percent of the largest tank. • The second is the 5-foot-diameter steel sump inside of the muscle wall area to capture a smaller potential leak or spill. Fluid captured in the sump will be pumped by vacuum truck for third-party off-site disposal. • The third is the system designed to capture a larger potential spill. Fluid captured in the sump and inside of the containment area will be pumped to an emergency standby tank on CPX's Pad 2 using the existing buried 8-inch bidirectional water flowline. The emergency standby tank on Pad 2 will be 10,000 bbl to 15,000 bbl in size. • The fourth is the compacted 2-foot-high earthen berm outside of the muscle wall containment area. • In combination, in the event of a significant water loss on Pad 25B, water will be contained inside of secondary containment and will flow to the 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. Water will flow to Pad 2 using CPX's existing bidirectional 8-inch flexsteel water pipeline. Residual water, if any, will be removed using a vacuum truck. The emergency standby tank on Pad 2 is sized to capture 10,000 or 15,000 bbl.	
6	Dust control	During High Wind Days • Construction scheduling will consider a high wind warning issued for Garfield County to avoid this period. • Stop work orders will be issued during high wind conditions when possible (sustained winds > 25 MPH). • Traffic on the pad will be minimal. The area inside of tank containment will be accessed on foot. • A water truck will be used to wet the pad surface if the areas fail to stabilize and form a crust. • Road maintenance will be performed to minimize fugitive dust. • Aggregate will be placed on the road and portions of the pad. The tank area will be lined. Speed Limits • Employees and contractors will observe posted speed limits on public roads and a 25 mile per hour limit on TPR access roads. Regular Road Maintenance • Regular inspection will occur for the access road for evidence of inadequate drainage and formation of potholes. • Grading, blading, and filling potholes will be performed to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion. • Spot graveling will be used to avoid erosion, formation of silts, and to stabilize surfaces for truck travel. Dust Suppression • The water storage tank area will be lined. It will be surrounded by a 4-foot muscle wall. • Areas not needed for temporary water support will be reclaimed in accordance with Rule 1003. • Fresh water from an approved water source will be used on disturbed surfaces when needed to minimize fugitive dust.	

		Soil Stockpile • The soil stockpile will be mounded and maintained to prevent loose soils and promote vegetative growth. • Vegetation will be allowed to establish, with hydroseed and mulch, to stabilize the stockpile, outcompete weeds, and promote microbial activity. Dust Control on Roadways • A water truck will be used to apply freshwater on access roads to minimize fugitive dust.
7	Construction	CPX will minimize the duration for road construction to an estimated five days. The timing of construction will optimize dry weather to avoid operating equipment in wet soils.
8	Emissions mitigation	• CPX will install equipment designed specifically to aid in the mitigation of VOC emissions from this location; this equipment includes tank load out controls; • CPX will not flare or vent gas during completion or flowback, except in upset or emergency conditions, or with prior written approval from the Director for necessary maintenance operations.
9	Drilling/Completion Operations	Site Preparation • Pad 25B will be graded and compacted to support MLVTs under an engineering design prepared by a third party geotechnical engineer. Soil testing will be conducted for geotechnical design. Proctor testing using 1- foot lifts during site preparation will confirm Atterberg limits, soil/moisture density, and compaction. Installation • In accordance with the MLVT policy (June 13, 2014), MLVTs will not be placed within 75 feet of a wellhead, fired vessel, heater treater, or a compressor rated 200 horsepower or more. The MLVTs will not be placed within 50 feet of a separator, well test unit, or other non-fired equipment. The location is approximately 2,020 feet from the CPX property boundary. • MLVTs will be field assembled with installation and set up by the manufacturer's representative. CPX representatives will be onsite during installation. Installers will ensure appropriate site conditions for installation. They will inspect liner seams and steel welds. MLVTs will be installed with ultraviolet protectant. • MLVTs will be placed inside of lined secondary containment to provide 150 percent containment of the largest tank, in accordance with Rule 603.o.(1). The liner will be 30 to 50 mil polyethylene. Secondary containment will have a 4-foot-high polyethylene muscle wall comprised of 8-foot-long interlocking sections. The sections will be 10 inches thick and secured with locking pins. The liner will overlap and clamp to the top of the muscle wall. • A 5-foot diameter steel sump will be installed inside of the muscle wall area to capture and contain natural drainage. • The perimeter of the pad outside of the muscle wall will have a 2-foot-high earthen berm, compacted to 95 percent soil/moisture density. • A 12-inch manifold will separate each row of tanks. There will be a blind flange on each end of the manifold. • 4-inch rubber hoses will connect the manifold to individual tanks. Hoses will have an isolation valve using a 4-inch butterfly valve at each end of the hose to shut down the line. There will be no relief valves on the manifold or hoses. • There will be no vehicle access inside of the muscle wall. The muscle wall will form a barrier. A straddle ladder will provide personnel with access inside of the muscle wall. Testing • The manufacturer's representative will provide on-site inspection and testing prior to putting MLVTs into use. • Tanks, manifolds, hoses, connections, pumps, and other fluid circulating equipment will receive mechanical inspection and testing to ensure it is properly installed and will not leak prior to use. Equipment that has failed or will leak will be addressed or removed and replaced. • The operator will be present during initial filling of the MLVTs. During initial filling, the installer will supervise and further inspect for leaks. The operator and contractors will have stop work authority if unsafe or malfunctioning conditions are observed.
10	Interim Reclamation	• Timing – Interim reclamation will begin within 6 months after pad construction and the site is transitioned from construction to temporary water support for well completions. • Waste Disposal – CPX will properly characterize and dispose of waste in accordance with its Waste Management Plan. • Recontouring - Disturbed areas will be recontoured to blend with the pre-disturbance

		surface and restore natural drainage patterns during final reclamation. • Topsoil - Topsoil stored on the location will be restored if needed on reclaimed areas. Salvaged topsoil will be replaced and contoured to maximize erosion control and soil stability. • Erosion control – Erosion controls will be maintained to prevent stormwater run on, runoff, and erosion. Stormwater controls during operation are shown on the attached Facility Layout Drawing. • Seedbed Preparation – After pad construction, areas not needed for tank installation will be kept free of equipment and compaction to maintain loose soil structure for hydromulch and seeding. • Seed mix – CPX will hydromulch and seed the U.S. Forest Service Native Plant Materials Program certified weed-free recommended seed mix. • Weed control – The location will be monitored for the presence of invasive weeds. Invasive weeds will be treated to prevent them from establishing or spreading. • Access – Unauthorized access will continue to be restricted by the locked gate to TPR at the northern end of the Tepee Park Ranch road. • Monitoring – The location will be monitored for vegetative success. It will be reseeded where needed to establish vegetative cover.
11	Final Reclamation	Final Disposition and Decommissioning • When well completions on TPR are finished, any residual water in the MLVTs will be disposed of using CPX's UIC well on Well Pad 25A and potential hauling to a third-party disposal facility. MLVTs then will be taken out of service. The tanks will be pressure washed. Any accumulated sludge in the bottom of a tank will be removed and haul by Greenleaf Environmental Services for disposal. MLVTs and appurtenances will be dismantled and removed from the location. The location will be reclaimed.

Total: 11 comment(s)

Attachment List

Att Doc Num	Name
2158327	MULTI PAD FLOWLINE EXHIBIT
4232401	LAYOUT DRAWINGS
403077002	FORM 2A SUBMITTED
403100388	LESSER IMPACT AREA EXEMPTION REQUEST
403100473	CPW CONSULTATION
403100474	LOCATION AND WORKING PAD GIS SHP
403100489	LOCATION PICTURES
403100490	PRELIMINARY PROCESS FLOW DIAGRAMS
403100495	CULTURAL FEATURES MAP
403100496	WILDLIFE HABITAT DRAWING
403100499	GEOLOGIC HAZARD MAP
403100501	REFERENCE AREA MAP
403103335	ACCESS ROAD MAP
403130474	REFERENCE AREA PICTURES
403130475	HYDROLOGY MAP
403130485	NRCS MAP UNIT DESC
403130486	CONSULTATION SUMMARY
403130488	RELATED LOCATION AND FLOWLINE MAP
403130769	LOCATION DRAWING

Total Attach: 19 Files

General Comments

User Group	Comment	Comment Date
Final Review	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	09/18/2022
Final Review	With concurrence from operator: - Changed the number of MLVTs on the Equipment tab from 15 to 12 to be consistent with what is shown on the Layout Drawing; - Attached the Multi Pad Flowline Exhibit.	09/16/2022
OGLA	Attached revised Waste Management Plan.	09/16/2022
Final Review	Added Form 2A doc# for the well pad (Location 334457) that is being supported by frac operations on this proposed new Location.	09/06/2022
CPW	CPW consulted with CPX regarding the Temporary Water Support Pad 25B in TeePee Park Ranch (TPR) in June 2021. CPW staff is familiar with this immediate area. Taylor Elm and Danielle Neumann attended a presentation and on-site visit to CPX's TPR holdings on May 27, 2021. CPX requested formal consultation for the Temporary Water Support Pad 25B on June 2, 2022. CPX Pad 25B is not located within CPW-mapped High Priority Habitat. CPX selected the location for Pad 25B to avoid impacts to High Priority Habitat. However, approximately 310 feet of associated access road will need to be rerouted to place sufficient stormwater controls north of Pad 25B and reduce the road grade south of Pad 25B. The reroutes are along the edge of 1202.c.(1).R. habitat, and are exempt from the NSO designation pursuant to Rule 1202.c.(2).C. CPW does not anticipate adverse impacts to cutthroat trout habitat from these activities. CPX's proposed Best Management Practices (including storm water and spill prevention measures) and avoidance practices are sufficient to address any potential concerns. This effort supports further utilization of Pad 25A, an existing location that CPW incentivizes the use of to reduce more significant infrastructure development and habitat fragmentation. Rules 1202.c.(2).C. and 309.e.(1).C. support this conclusion. Approved By: Danielle Neumann Date: September 6, 2022	09/06/2022
OGLA	Placed the following Best Management Practices (selected from the submitted plans and supplemental BMPs submitted by CPX) on the Form 2A: planning, general housekeeping, wildlife protection, stormwater/erosion control, material handling and spill prevention, dust control, emissions mitigation, drilling/completion operations, and interim reclamation.	09/05/2022
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	08/21/2022
OGLA	Rule 304.d Lesser Impact Area exemption requested for Rule 304.c.(3) Light Noise Mitigation Plan. Exemption granted by Director on 8/18/22 based on the determination that the impacts to the resource will be so minimal as to pose no concern that a plan is necessary.	08/18/2022
OGLA	Rule 304.d Lesser Impact Area exemption requested for Rule 304.c.(2) Noise Mitigation Plan. Exemption granted by Director on 8/18/22 based on the determination that the impacts to the resource will be so minimal as to pose no concern that a plan is necessary. Noise BMPs may be applied during the technical review	08/18/2022

Total: 9 comment(s)

Public Comments

No public comments were received on this application during the comment period.