COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

DIRECTOR'S RECOMMENDATION

Docket #220500097

TEP Rocky Mountain LLC, (TEP, Operator ID #96850)

Ryan Gulch Phase 2 OGDP (OGDP ID #482485)

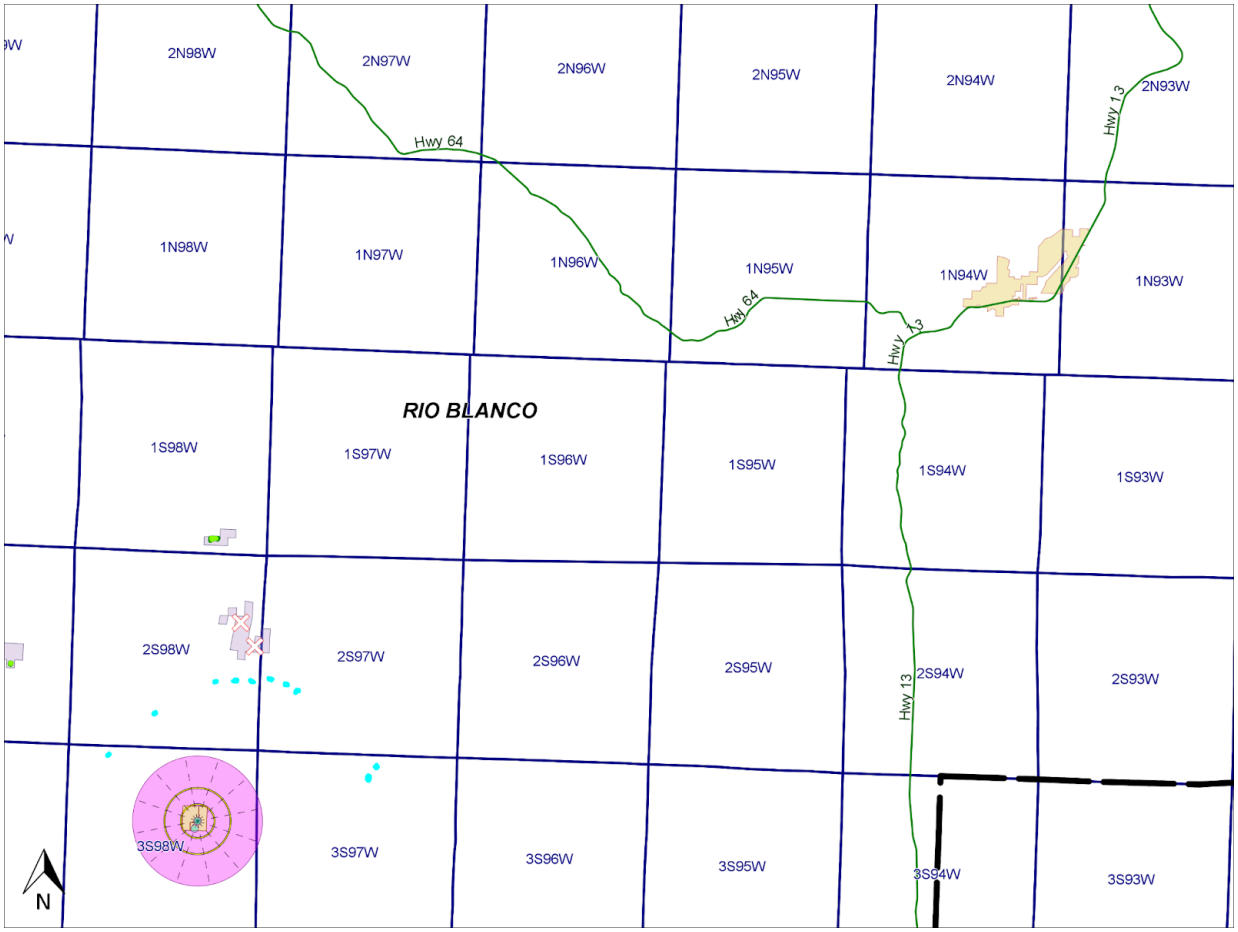
Form 2As #402932354, #402932455, Form 2B #402932424, Form 2C #402932435

Pursuant to Rule 306, the Director submits to the Commission this recommendation for the TEP Ryan Gulch Phase 2 Oil and Gas Development Plan (OGDP) located in Rio Blanco County. As detailed below, the Director recommends Commission approval of the Ryan Gulch OGDP.

BACKGROUND

On May 16, 2022 TEP submitted a Form 2C, Oil and Gas Development Plan Certification, and all required components for an OGDP application with the Colorado Oil and Gas Conservation Commission (COGCC). The Hearing Application was returned to the applicant once for revisions. The Director determined the application was complete on July 6, 2022. This Recommendation is based on information finalized in the two Form 2As, Form 2B, and Hearing Application as of September 1, 2022. No additional revisions will be made to the application prior to the Commission Hearing scheduled for September 7, 2022.

TEP Ryan Gulch Phase 2 Proposed Development:
The proposed Ryan Gulch Phase 2 OGDP includes the existing Federal 298-13-1 well pad (Location ID #315513) and one proposed Oil and Gas Location, the Federal RG 11-13-298 well pad. The Ryan Gulch Phase 2 OGDP includes the development of one (1) existing and sixteen [16] new directional gas wells from the existing Federal 298-13-1 well pad, and twenty-two [22] new directional wells from the proposed Federal RG 11-13-298 well pad, for a total of thirty-nine (39) directional natural gas wells. The Ryan Gulch Phase 2 OGDP locations are on Federal surface with Federal minerals administered by the Bureau of Land Management (BLM). The development of approximately 559.70 acres of mineral lands are located in Township 2 South, Range 97 West, portions of Section 18 and Township 2 South, Range 98 West, portions of Sections 11, 12, 13, 14, and 24; please see the OGDP Map as approved in the Form 2C. All thirty-eight (38) proposed new wells will be directionally drilled into three (3) Federal Leases including COC-0003453, COC 66586, and COC 60740. The proposed surface lands are in a sparsely populated rangeland area of Rio Blanco County, approximately 24 miles west-southwest of the Town of Meeker and 37 miles northwest of the City of Rifle.



Existing Federal 298-13-1 Well Pad:
The proposed development will reoccupy, re-disturb the original footprint, and expand the existing Federal 298-13-1 well pad (Location ID #315513) which currently has one (1) producing directional gas well and associated production equipment. TEP plans to drill an additional sixteen (16) new directional gas wells from the existing Location. The existing lease road, accessed from Rio Blanco County Road 26, will be utilized to access the existing Oil and Gas Location during construction, drilling, completion, and production operations. BLM Road 1019 will also be utilized to access the Federal 298-13-1 well pad from the west during all phases of development.

The existing Federal 298-13-1 Location will include a total of seventeen (17) directional gas wells (16 new and 1 existing), nineteen (19) separators, six (6) 400-bbl produced water storage tanks, two (2) 400-bbl condensate storage tanks, four (4) enclosed combustion devices (ECDs), two (2) 500-bbl blowdown tanks, four (4) 500-gallon and one (1) 135-gallon chemical tank with five (5) pumps, and various other production equipment. Temporary equipment planned for completion and flowback operations includes three (3) 500-bbl frac tanks, two (2) high pressure separators, one (1) low pressure separator, one (1) low pressure ECD, one (1) water transfer pump, one (1) buy-back meter (Williams Midstream), and various other flowback equipment. TEP plans to begin re-construction of this Location in the 3rd Quarter of 2022, drilling in the 3rd

Quarter of 2023, completions in the 4th Quarter of 2023 to the 3rd Quarter of 2024; placing the wells into production in the 3rd Quarter of 2024, and conducting interim reclamation in the 3rd Quarter of 2024.

Proposed Federal 11-13-298 Well Pad:
TEP is proposing to drill, complete, and operate twenty-two (22) directional natural gas wells from the proposed Federal RG 11-13-298 well pad. The Federal RG 11-13-298 well pad will be accessed via an existing 1.86-mile access road from Rio Blanco County Road 26, including BLM 1019, and the construction of a new 0.75-mile access road. The existing and proposed access roads will be used during construction, drilling, completion, and production operations.

In addition to the wells, the proposed Federal 11-13-298 Location will include twenty-six (26) separators, six (6) 400 bbl produced water storage tanks, four (4) 400-bbl condensate storage tanks, four (4) ECDs, two (2) 500-bbl gun barrel tanks, four (4) 500-gallon and one (1) 135-gallon chemical tanks with five (5) pumps, and various other production equipment. Temporary equipment planned for completion and flowback operations includes three (3) 500-bbl frac tanks, two (2) high pressure separators, one (1) low pressure separator, one (1) low pressure ECD, one (1) water transfer pump, one (1) buy-back meter (Williams Midstream), and various other flowback equipment. TEP plans to begin construction of this Location in the 3rd Quarter of 2022, drilling in the 2nd Quarter of 2023, completions in the 4th Quarter of 2023 to the 2nd Quarter of 2024; placing the wells into production in the 1st Quarter of 2024, and conducting interim reclamation in the 2nd Quarter of 2024.

Federal RGU 23-7-297 Remote Frac Support Location:
Well completion operations associated with the proposed wells on the Federal 298-13-1 well pad and the Federal RG 11-13-289 well pad will be conducted via simultaneous operations (“SIMOPS”) from the existing Federal RGU 23-7-297 well pad (Location ID #316408) which was reconstructed in 2020 to support remote well completion operations for existing and future completion operations for the Ryan Gulch gas wells beginning in the 2nd Quarter of 2023. The existing working surface of the well pad will not be expanded for well completion operations. Water will be transported to the Federal RGU 23-7-297 well pad via existing water pipelines operated and maintained by TEP. TEP will install five (5) four-and-one-half-inch (4.5”) steel temporary surface frac lines from the Federal RGU 23-7-297 well pad to the Federal 298-13-1 and Federal RG 11-13-298 well pads to support remote frac and flowback operations.

To support production operations on the Federal 298-13-1 well pad, Williams Midstream will install one (1) eight-inch (8”) steel natural gas pipeline (approximately 485 feet in length; 0.45 acres new disturbance) from the proposed separators on the Federal 298-13-1 well pad to the existing sixteen-inch (16”) natural gas pipeline south of the well pad along BLM Road 1019. TEP will install one (1) six-inch (6”) Coreline or FlexSteel water pipeline (approximately 65 feet in length; 0.06 acres of new disturbance) from the proposed produced water transfer pump on the Federal 298-13-1 well pad to the proposed tie-in point with an existing dual four-inch (4”) and six-inch (6”) water pipelines located south of the oil and gas location adjacent to BLM Road 1019.

To support production operations on the Federal RG 11-13-298 well pad, Williams Midstream will install one (1) eight-inch (8”) steel natural gas pipeline (approximately 4,082 feet in length; 3.75 acres of new disturbance) from the proposed separators on the Federal RG 11-13-298 well pad to the existing sixteen-inch (16”) natural gas pipeline south of the well pad adjacent to BLM Road 1019. TEP will install one (1) six-inch (6”) Coreline or FlexSteel water pipeline (approximately 4,006 feet in length; 3.68 acres of new disturbance) from the separators on the Federal RG 11-13-298 well pad to the proposed tie-in point with an existing six-inch (6”) water pipeline located north of BLM road 1019.

The proposed off-location pipelines will be installed within a sixty-foot (60’) pipeline Right-of-Way located on Federal surface paralleling the proposed access road. The proposed produced water and gas pipelines will not cross any mapped High Priority Habitat (HPH).

Surface Lands:
The **Federal 298-13-1** well is located on Federal surface. The existing location will be expanded from its current interim reclaimed state to accommodate the one (1) existing and sixteen (16) new wells and production equipment.

- Oil and Gas Location disturbance - 7.52 total acres (2.77 acres of existing disturbance and 4.75 acres of new disturbance); reclaimed to 1.89 acres after interim reclamation;
- Working Pad Surface (WPS) disturbance - 4.23 total acres;
- Water and Gas Pipeline Corridor disturbance - 0.51 acres of new disturbance;
- Access Road disturbance - no new disturbance; the existing Access Road from Rio Blanco County Road 26 to the existing well pad is approximately 6,105 feet in length, equating to approximately 3.55 acres of disturbance that remains after interim reclamation;
- The total Ryan Gulch OGDP disturbance for this location is approximately 8.03 acres.

The **Federal RG 11-13-298** well pad is located on Federal surface. The proposed location will be built to accommodate the twenty-two (22) new wells and associated production equipment.

- Oil and Gas Location disturbance - 8.15 acres of new disturbance; reclaimed to 1.54 acres after interim reclamation;
- Working Pad Surface (WPS) disturbance - 4.28 acres of new disturbance;
- Water and Gas Pipeline Corridor disturbance - 7.43 acres of new disturbance;
- Access Road disturbance - The proposed new Access Road from the existing lease to the no new disturbance; the existing Access Road from Rio Blanco County Road 26 to the proposed well pad is 3,960 feet in length, equating to approximately 2.27 acres of new disturbance; while the existing lease road is 9,855 feet in length, equating to 8.65 acres of existing disturbance; this results in a total of 10.92 acres of road disturbance that remains after interim reclamation;
- The total Ryan Gulch OGDP disturbance for this location is approximately 17.85 acres.

Mineral Development:
TEP is requesting the development of FEDERAL minerals covering approximately 559.70 total acres from the Williams Fork and Iles formations from thirty-eight (38) new directional wells, and one (1) existing well, for a total of thirty-nine (39) total wells as follows:

- Existing Order 1-229
    - Order 1-229 is a basin-wide order establishing the following requirements for wells drilled into the Williams Fork and Iles Formations in the Piceance Basin:
        - Well Density: one well per ten acres; and
        - Setbacks: no closer than 100 feet from the north and south boundaries and no closer than 600 feet from the east and west boundaries.
    - TEP seeks to drill twenty-two (22) new directional wells under existing Order 1-229 from the proposed FEDERAL RG 11-13-298 location.
    - TEP seeks to drill sixteen (16) new directional wells under existing Order 1-229 from the existing FEDERAL 298-13-1 location (LOC ID: 315513), which has one (1) existing producing well, for a total of seventeen (17) total wells on the location.

This development, as outlined in TEP's amended Hearing Application, complies with applicable COGCC rules.

Financial Assurance:
Staff confirmed that TEP has a valid blanket plugging bond on record consistent with Rule 702.

LOCAL GOVERNMENT PERMITTING AND PRE-APPLICATION CONSULTATIONS

Relevant Local and Proximate Governments:
Rio Blanco County (RBC) is the Relevant Local Government for the OGDP. There are no Proximate Local Governments to the proposed OGDP.

Local Permit with Rio Blanco County (RBC):
On April 5, 2022, prior to submittal of the Ryan Gulch Phase 2 OGDP and Oil and Gas Location Assessments (Form 2As), TEP sent formal notice to Rio Blanco County, the local government with land use authority over siting of the Federal 298-13-1 and Federal RG 11-13-298 well pad Locations, as required by COGCC Rule 302.e and Rule 303.e.(2) & (3).

On April 7, 2021, TEP, Bureau of Land Management (BLM), Colorado Parks and Wildlife (CPW), COGCC, RBC, and West Water Engineering Inc. met near the access road to the existing Federal 298-13-1 well pad to review the proposed development plan and discuss the permitting requirements associated with the Federal 298-13-1 and Federal RG 11-13-298 well pad Locations. RBC provided positive feedback regarding the development and confirmed that a county permit would be required for development of the oil and gas location, as well as the proposed water pipelines.

On April 26, 2022, TEP submitted Well Pad Special Use Building Permit (SUBP) applications for the two well pad locations to RBC for review and approval concurrently with the submittal of the OGDP and Form 2As (May 16, 2022). RBC subsequently approved SUBP #COGW-0006-20 for the proposed locations on April 29, 2022. The Emergency Response Plans were coordinated with the Rio Blanco County Emergency Management Agency and the Emergency and Natural Resource Manager, Edward Smercina, and were approved on July 21, 2021.

Pre-Application Consultation with Colorado Parks and Wildlife (CPW):
Although the locations, access roads, and pipelines do not fall within CPW-mapped HPH, a CPW pre-application consultation was conducted on April 28, 2021. TEP, CPW, BLM, COGCC, and others met onsite, where TEP provided an overview of proposed development activities for the Federal 298-13-1 and Federal RG 11-13-298 well pad Oil and Gas Locations; such as well pad construction/reconstruction, drilling and completion operations, facility installation (proposed pipeline routes), and a preliminary development schedule. The potential impacts to wildlife as a result of construction and operation of the proposed facility were discussed. Since the oil and gas location is located outside of the High Priority Habitat (HPH), and since TEP would be utilizing one existing oil and gas location, wildlife impacts would be minimal. Discussion during the meeting also focused on construction activities occurring during the migratory bird season, which begins April 1 and ends August 31 annually. TEP indicated that guidelines established in COGCC's 1200 series rules would be followed to protect migratory birds.

TEP conducted a second pre-application consultation meeting with CPW on April 26, 2022, prior to permit submittals, to provide the updated Wildlife Protection Plans and other updated development plan materials for review. Additionally, TEP requested input regarding the Lesser Impact Area Exemption request for the Noise and Lighting Mitigation Plans. CPW provided a few minor edits to the Wildlife Protection Plans, which have been incorporated into the plans attached to the amended Form 2As.

These pre-application consultations with CPW resulted in consensus between TEP and CPW concerning the avoidance of any potential impacts to wildlife and associated habitats.

Pre-Application Consultation with BLM:
On April 7, 2021, representatives from TEP, BLM, CPW, COGCC, RBC, and West Water Engineering Inc. met to review the Ryan Gulch Phase 2 OGDP. This was the initial meeting between the operator and BLM representatives to review the existing Federal 298-13-1 and the proposed Federal RG 11-13-298 well pads to solicit feedback from BLM regarding any issues that may need to be addressed prior to the Federal application submittals.

The following outlines the main topics of discussion during the onsite specifically for the Federal 298-13-1 and the Federal RG 11-13-298 well pads:

- BLM stated that vegetation removal will need to be conducted outside the migratory bird timing limitation unless a survey is conducted to ensure migratory birds are not present within the vicinity of the oil and gas location. Since the initial onsite development timing has been modified, construction operations would begin in September 2022, at the end of the migratory bird timing limitation period. A survey will be conducted and, if

necessary, construction will be delayed.
- BLM stated that a firewood permit will be required for tree removal. TEP will pay for the firewood prior to construction and following further assessment by BLM.
- BLM stated that resource surveys will be required for the planned activities, including plant, weed, raptor, and cultural surveys. TEP completed these surveys in the spring and summer of 2021.

The Ryan Gulch Phase 2 Environmental Assessment (EA) will be published in August or September 2022. After the EA is completed, TEP will seek to obtain the required BLM Right-of-Way Grants for the existing and new proposed Oil and Gas Locations, Access Roads, proposed off-location pipelines, and temporary surface frac lines for the two locations and APDs for the 38 wells that will produce Federal minerals.

ADMINISTRATIVE CONSIDERATIONS

Lesser Impact Area Exemption Request Summary:
TEP requested a Rule 304.d Lesser Impact Area Exemption for the "Noise Mitigation Plan" (Rule 304.c.(2)) and the "Light Mitigation Plan" (Rule 304.c.(3)) from the Director based on evidence showing these plans are not necessary because the impacted resources or resource concern is not present in the area (e.g., Residential Building Units) or the impacts are so minimal as to pose no concern (e.g., wildlife).

During planning of the Federal 298-13-1 and Federal RG 11-13-298 well pads, TEP determined through on-site surveys and review of available aerial imagery that there are no Residential Building Units (RBU) within one mile of the proposed working well pad surfaces (WPSs) of these two oil and gas locations. Since no RBUs are present within one mile it is unlikely for noise or light generated during pre-production operations to adversely impact members of the public. Additionally, TEP will not have any onsite lighting during long-term production operations eliminating the potential long-term impacts of lighting. Please refer to the Cultural Distance Map showing that there are no RBUs within one mile of the well pad locations.

TEP also reviewed HPH areas within one mile of the Federal 298-13-1 and Federal RG 11-13-298 well pads. These two well pads are located outside of all HPH boundaries. HPH areas identified within one mile of the working well pad surface include Mule Deer Severe Winter Range and Winter Concentration areas, and Aquatic Sportsfish Management Waters. As shown on the Wildlife Habitat Drawings attached to the Form 2As, the Federal 298-13-1 oil and gas location is located 990 feet west of the Mule Deer Winter Concentration area boundary; while the proposed Federal RG 11-13-298 oil and gas location is located 453 feet south of the Mule Deer Severe Winter and Winter Concentration Area boundaries. Onsite lighting will only be utilized during pre-production operations. No onsite lighting will be utilized during long-term production operations. During the initial planning process for these oil and gas locations, TEP consulted with CPW to discuss potential impacts from lighting during operations on the two well pad locations. During recent correspondence CPW stated "there were no additional requests made by CPW for noise and light mitigation pursuant to Rules 423.b.(4) and 424.c.(3).C.". CPW also stated that these locations are "not within or near habitats that CPW considers especially sensitive to noise and light impacts" (see the CPW Consultation from April 27, 2022, for

additional details on CPW's evaluation of lighting impacts).

Based on COGCC Staff review of information provided in the Lesser Impact Area Exemption Request attachment during the Form 2A Completeness Review, staff determined that the potential noise and light impacts to the public and wildlife will be so minimal as to cause no concern. Therefore, the Director granted TEP's Exemption Request for both plans on June 7, 2022. Although the plans were exempted, TEP has included Best Management Practices (BMPs) on the Form 2A to mitigate noise and light nuisances.

TEP did not include any variance requests in their application materials and none are required.

PUBLIC COMMENTS

The public comment period was open for 30 days from July 6, 2022 to August 5, 2022 per Rule 303.d.(1).A.ii. No public comments were received during the public comment period. No public comments were received in this docket in the eFiling system as of September 1, 2022.

COGCC STAFF'S TECHNICAL REVIEW HIGHLIGHTS

This section addresses issues related to public health, safety, welfare, the environment, and wildlife resources, as required by the Oil and Gas Conservation Act, 34-60-106(2.5)(a), for the TEP Ryan Gulch Phase 2 OGDP.

Alternative Location Analysis (ALA)

The Federal 298-13-1 and Federal RG 11-13-298 well pad locations did not meet any of the criteria listed in Rule 304.b.(2); therefore, no ALA was required by rule.

Public Health, Safety, and Welfare Considerations

During the initial completeness review of the OGDP no RBUs were identified within one mile of the two locations. In addition, there are no High Occupancy Building Units, School Facilities, or Child Care Centers within one mile of the proposed WPS. The OGDP is not within a Disproportionately Impacted Community.

Staff has determined that the proposed site-specific BMPs will adequately minimize and/or mitigate the potential adverse impacts to public health, safety and welfare. The BMPs and plans address administrative processes (coordination and permitting with relevant local government) and nuisance conditions (e.g. noise, lighting, odors, and dust). Staff concludes that there are no significant potential direct adverse impacts to public health, safety, and welfare.

Environmental Resource Considerations

Through on-site visits and evaluation of information provided on the Hydrology Map, Staff has determined that the proposed WPSs at these locations do not lie within a Sensitive Area for water resources. Groundwater is estimated to be deeper than 100 feet below ground surface (bgs), and the nearest downgradient surface water features are one dry intermittent stream approximately 2,711 feet to the north of the proposed WPS of the Federal 298-13-1 well pad

and an intermittent stream approximately 1,497 feet to the east of the proposed WPS of the Federal 11-13-298 well 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 minimal potential impacts to other environmental resources such as soils.

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

TEP provided the following site-specific BMPs addressing the minimization of potential impacts during construction, drilling/completion, and production operations for the protection of wildlife resources at the proposed Ryan Gulch Phase 2 Locations:

1) TEP has tentatively scheduled re-construction of the Federal 298-13-1 well pad during September of 2022, and construction of the Federal RG 11-13-298 during September of 2023, respectively; which are outside the nesting season for migratory birds;
2) To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions on all lease roads and requires all TEP employees and contractors to adhere to all posted speed restrictions; the speed limit for the existing access road to the Federal 298-13-1 well pad is and will be twenty-five (25) miles per hour; during production, operations and site visits will occur between 10:00 am to 3:00 pm;
3) All trucks on location will be prohibited from idling when not in use to prevent unnecessary noise;
4) Site lighting will 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) TEP will minimize direct impact to wildlife habitat by utilizing existing infrastructure and disturbance corridors;
6) Well telemetry equipment will be installed to minimize site visitation through remote monitoring of injection operations.

Based on the well pad locations, proposed schedules, and wildlife protection BMPs, Staff concludes that there are no significant potential adverse impacts to wildlife.

DIRECTOR'S RECOMMENDATION:

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGDP's proposed operation and its potential impacts on public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that this OGDP complies 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: 402932354

Date Received: 05/16/2022

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: **315513**

OGDP ID:

Expiration Date:

☐ New Location ☐ Refile ☒ Amend Existing Location # 315513

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
220500097		

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: 96850

Name: TEP ROCKY MOUNTAIN LLC

Address: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

Contact Information

Name: Jeff Kirtland

Phone: (970) 263-2736

Fax: ( )

email: jkirtland@terraep.com

FINANCIAL ASSURANCE

☐ Plugging and Abandonment Bond Surety ID (Rule 706):

☐ Gas Facility Surety ID (Rule 711):

☐ Waste Management Surety ID (Rule 704):

LOCATION IDENTIFICATION

Name: FEDERAL Number: 298-13-1

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: LOT 12 Section: 13 Township: 2S Range: 98W Meridian: 6 Ground Elevation: 6667

Latitude: 39.871843 Longitude: -108.337889

GPS Quality Value: 1.4 Type of GPS Quality Value: PDOP Date of Measurement: 07/21/2021

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 #
☐		

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: RIO BLANCO 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? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: Yes

Date Relevant Local Government permit application submitted: 04/26/2022

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

Status/disposition date: 04/29/2022

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: Edward Smercina Contact Phone: 970-878-9586

Contact Email: edward.smercina@rbc.us

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: Yes

Date submitted: 05/24/2022

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

Status/disposition Date: 06/06/2022

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: Matthew Dupire Contact Phone: 970-878-3839

Contact Email: mdupire@blm.gov Field Office: White River Field Office, Meeker Colorado

Additional explanation of local and/or federal process:

TEP will be submitting sixteen APDs for wells with bottom holes in Federal Oil & Gas Lease COC-0003453. Existing Right-of-Way Grant COC-80220, will be used for the proposed frac lines and COC-80226 will be for the Federal RGU 23-7-297 pad to be used as a remote frac support location. Bargath will be acquiring the ROW grant for the proposed 8" natural gas pipeline.

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)? Yes

Date of local government consultation: 04/07/2021

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? Yes

Date of federal consultation: 04/07/2021

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: Bureau of Land Management Phone: 970-878-3800

Address: White River Field Office Fax:

Address: 220 East Market Street Email: mdupire@blm.gov

City: Meeker State: CO Zip: 81641

Surface Owner at this Oil and Gas Location: ☐ Fee ☐ State ☒ Federal ☐ Indian

Check only one:

☐ 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: Yes

Lease description if necessary: Oil & Gas Location overlies COC-0003453

SITE EQUIPMENT LIST

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

Wells	17	Oil Tanks	0	Condensate Tanks	2	Water Tanks	6	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	19	Injection Pumps	0	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	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	4
Meter/Sales Building	0	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Blowdown/Vent Tanks - 500 bbl	2
Produced Water Transfer Pump	1
Air Compressor / Dual Fuel Gen	1
Chemical Tank - 135 gal	1
Gun Barrel Tanks - 500 bbl	2
Chemical Tanks - 500 gal	4
Dual Fuel Generator	1
Chemical Pumps	5

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Water Transfer Pump - FB	1
Enclosed Water Tanks 500 bbl - FB	3
Buy-Back Meter (Williams)	1
Low Pressure P-Tank 500 bbl - FB	1
High Pressure 4 Phase Sep. - FB	2
Enclosed Combust. Device (LP) - FB	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.

Off Location Flowline Installations:
1 - 8" Gas Gathering Line, steel, approx. 485 ft.
1 - 6" Water Pipeline, Coreline or Flexsteel, approx. 65 ft.

Off Location Flowline Temporary Installations:
5 - 4.5" Temporary Steel Surface Frac Lines - approx. 7,810 ft.

On Location Flowline Installations:
17 - 2" Coated Steel Wellhead Lines - approx. 115 ft.
1 - 2" Coated Steel Surface Condensate Dump Line - approx. 170 ft.
1 - 2" Coated Steel Surface Water Dump Line - approx. 170 ft.
1 - 2" Coated Steel Surface Water Vent Line - approx. 170 ft.
1 - 2" Coated Steel Surface Water Blowdown Line - approx. 170 ft.
1 - 4" Aluminum Surface ECD Process Piping - approx. 210 ft.
1 - 1" Coated Steel Surface Fuel Gas Line/ECD - approx. 20 ft.
1 - 1" Coated Steel Surface Fuel Gas Line/Tank Burners - approx. 80 ft.
1 - 2" Coated Steel Rig Fuel Gas Line - approx. 115 ft.

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:	5280	Feet	SE					
Residential Building Unit (RBU):	5280	Feet	SE	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280	Feet	NE	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	NE					
Public Road:	4605	Feet	S					
Above Ground Utility:	4888	Feet	S					
Railroad:	5280	Feet	NW					
Property Line:	4739	Feet	S					
School Facility:	5280	Feet	NE					
Child Care Center:	5280	Feet	NE					
Disproportionately Impacted (DI) Community:	5280	Feet	NW					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	NE	☐	☐	☐		☐

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: 7.52

Size of location after interim reclamation in acres: 1.89

Estimated post-construction ground elevation: 6667

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:

The current land use for this property is considered rangeland / recreational. The property in the immediate vicinity of this Oil and Gas Location is primarily used for cattle grazing but is also periodically used for recreation, including hunting.

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

Rio Blanco County has a zoning designation of "Agricultural" for this property.

Describe any applicable Federal land use designation:

The surface owner (BLM) does not intend to modify the current land use. Therefore, the final land use designation will remain as rangeland / recreational.

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):

The surface owner (BLM) does not intend to modify the current land use. Therefore, the final land use designation will remain as rangeland / recreational.

Reference Area Latitude: 39.873036 Reference Area Latitude: -108.336287

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

Plant Community	Dominant vegetation
Shrub Land	Pinyon/Juniper Woodlands
Shrub Land	Wyoming Sagebrush

Noxious weeds present: Yes

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: 70—Redcreek-Rentsac complex, 5 to 30 percent slopes

NRCS Map Unit Name:

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: 5277 Feet SW

Spring or Seep: 5715 Feet SW

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 100 Feet

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

Hydrogeological indicators do not support the occurrence of shallow groundwater at the site, depth to groundwater is probably greater than 100 feet in the underlying bedrock. Potential impact to groundwater resources at the site is deemed to be low based on the site hydrogeology. Sensitive Area Determination Checklist, WestWater Engineering 8/17/2021

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 2711 Feet NW

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: 2711 Feet NW

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

Unnamed dry intermittent drainage classified as riverine, streambed seasonally flooded. Wetland information is from NWI and was not field verified due to proximity to the pad.

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:

- [ ] 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: 04/07/2021

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):

< No row provided >

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?

N/A

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

Direct impact habitat mitigation fee amount: $ 0

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?

N/A

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

Indirect impact habitat mitigation fee amount: $ 0

Operator Proposed Wildlife BMPs

No	Target Species	BMP Type	Description
1	BLACK BEAR	Wildlife - Avoidance	The operator agrees to report bear conflicts immediately to CPW staff.
2	BLACK BEAR	Wildlife - Avoidance	TEP will install and utilized bear proof dumpsters and trash receptacles for food- related trash at all facilities that generate trash.

3	RAPTORS	Wildlife - Minimization	Exclusionary devices will be installed to prevent bird and other wildlife from access equipment stacks, vents, and openings.
4	MULE DEER & ELK	Wildlife - Minimization	The operator agrees to reclaim mule deer and elk habitats with CPW identified native shrubs, grasses, and forbs appropriate to the ecological site disturbed.
5	MULE DEER & ELK	Wildlife - Minimization	To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions. During post-development production operations, TEP will make best efforts to minimize operations at this location during winter months by maximizing operations when possible, between 9:00am to 4:00pm when wildlife activity minimal.
6	MULE DEER & ELK	Wildlife - Minimization	Certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife will be used. TEP will use certified, weed free grass hay, straw, hay or other mulch materials used for the reseeding and reclamation of disturbed areas.

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	TEP Rocky Mountain LLC (“TEP”) is proposing to drill, complete, and operate sixteen (16) directional natural gas wells from the existing Federal 298-13-1 pad which has one producing well. As described under Rule 304.b.(2).A, an Alternative Location Analysis (ALA) is only required for an Oil and Gas Location that "meets any of the criteria listed in Rule 304.b.(2).B." The Federal 298-13-1 pad does not meet any of these requirements and therefore an ALA is not required. The following 304.c Plans are not required for this submittal: Emergency Spill Response Program - Location not w/in 2640' of groundwater under the direct influence of a surface water well or Type III well or surface water that is 15 miles or less upstream from a PWS intake. Odor Mitigation Plan - Location is not w/in 2000' of a BU or DOAA. Transportation Plan - Rio Blanco County does not require the plan. Flood Shut-in Plan - Location is not w/in a flood plain. Hydrogen Sulfide Drilling Plan - Do not expect to encounter H2S during drilling. Community Outreach Plan - Location is not w/in 2000' of a RBU, HOBU, or school located w/in a DIC. Gas Capture Plan - Will connect to a mid stream gas gathering system prior to commencement of production ops. Geologic Hazard Plan - A Geologic Hazard Map and Report is attached.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 05/16/2022 Email: vschoeber@terraep.com

Print Name: Vicki Schoeber Title: Regulatory Specialist

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	• Prior to submittal of the APDs, Form 2, and the Form 2A, TEP conducted on-sites and meetings with the Bureau of Land Management (BLM), Colorado Parks and Wildlife (CPW), and Rio Blanco County. These on-sites and meetings were held to discuss TEP's proposed development plan for the Federal 298-13-1 pad and associated support facilities. Changes were made to the proposed development plan based on feedback received from all stakeholders and included in the APD. • The development plan for the Federal 298-13-1 pad was prepared to minimize surface impacts to the greatest extent possible through the development of multiple wells from one location by utilizing directional drilling technology and utilizing existing facilities and infrastructure where possible, which minimizes the surface area needed to conduct operations on the oil and gas location. • Existing infrastructure operated by Williams and TEP will be utilized for transportation of natural gas and produced water to minimize the surface disturbance required for tying into gathering facilities.
2	Planning	• Per the Colorado Department of Public Health and Environment ("CDPHE") Air Pollution Control Division ("APCD") requirements, TEP will implement ambient air quality monitoring on site during drilling, completion, and the first six (6) months of production operations; an air monitoring plan will be submitted 60 days prior to start of drilling operations; • TEP will properly maintain vehicles and equipment; • Other than safety devices, TEP will use non-emitting pneumatic controllers; and • TEP will have adequate and committed pipeline take away capacity for all produced gas.
3	Pre-Construction	• Prior to commencement of construction activities, TEP will hold a pre-construction meeting with contractors to review proposed site construction and installation of stormwater control measures. The site will be staked for construction prior to the preconstruction meeting. Staking will identify the boundaries of the proposed site to protect existing vegetation in areas that should not be disturbed.

4	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 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; and • TEP will follow manufacturers' recommendations and company policies for proper use and disposal of products.	
5	Wildlife	• TEP will inform and educate all employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife; • TEP will install a proposed water pipeline from the Oil and Gas Location to TEP's existing water management system to minimize truck traffic to the location and minimizing potential impacts to wildlife; • TEP will minimize direct impacts to wildlife habitat by utilizing existing infrastructure and disturbance corridors whenever possible; and • Well telemetry equipment will be installed to minimize site visitation through remote monitoring of production operations.	
6	Material Handling and Spill Prevention	• Audio, Visual, and Olfactory (AVO) inspections: AVO inspections will be conducted monthly at the Federal 298-13-1 oil and gas location throughout the life of the location. • Routine inspection of all production equipment, wellheads, temporary equipment, etc.; As described above, routine inspections to be conducted at the Federal 298-13-1 oil and gas location will include: Routine physical inspections of production equipment (by TEP production personnel); Air Compliance inspections and monitoring (by TEP Air Compliance staff); SPCC Inspections (by 3rd party contractor), Storm Water Management inspections (by 3rd party contractor), and continuous, dedicated SCADA monitoring of fluid production rates and pressures, and fluid storage volumes (by TEP production personnel). • As part of our LDAR, STEM, ooooa inspection / compliance programs, TEP will adhere to the use of Approved Instrument Monitoring Methods (AIMM) for inspecting production equipment and facilities at the Federal 298-13-1 oil and gas location. • Spill prevention training is provided to all field employees on a monthly basis. The monthly training consists of reviewing past incidents, root causes of the incidents, and what specific actions (lessons learned) could be taken to prevent the reoccurrence of such incidents in the future. • Flowlines will be integrity-tested per the 1100 Series rules. • TEP spill response procedures will be adhered to for any spills or releases occurring at the Federal 298-13-1 oil and gas location. All spills will be managed in accordance with the COGCC 900 Series rules. • Leak Detection and Repair (LDAR) inspections are performed at all locations; however, the inspection frequency is tiered based upon the level of emission controls that are required / employed at each location. • Storage Tank Emission Monitoring (STEM) inspections are performed monthly at any location where emissions must be controlled (> 2 tpy). • OOOOa inspections are performed semi-annually on any facility constructed after 2015. • Flare Logs are completed daily for all locations where active flares and emissions controls are required. • Spill prevention training will be provided to all field employees on an annual basis; • Any leaks or spills detected during monitoring will be reported within 24 hours in accordance with Rule 912.b; • Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Inspection and record retention of flowline testing will be in accordance per COGCC regulation; all records will be made available to the COGCC upon request; • All load lines will be bull plugged or capped; • All on-location flowlines will be inspected and tested per Rule 1104; • All equipment deficiencies will be corrected immediately or as soon as practical (all identified problems and corrections/repairs will be documented and records will be maintained in the TEP's office); • TEP will track and clean up all spills, including those that are not reportable; • TEP will temporarily shut in all production wells on the pad in the event of any upset condition;	

		• All piping is pressure tested and inspected for leaks prior to flowback; and • Automation technology will be utilized at this location; this technology includes the use of fluid level monitoring for the tanks and high-level shut offs.
7	Material Handling and Spill Prevention	• If PFAS-containing foam is used at a location, TEP will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions; • If PFAS-containing foam is used at a location, TEP will properly capture and dispose of PFAS contaminated soil and fire and flush water; and • If PFAS-containing foam is used at a location: TEP will properly characterize the site to determine the level, nature and extent of contamination.
8	Material Handling and Spill Prevention	Water Resource Protection: • Informal inspections of all tanks and storage facilities will occur daily during drilling, completions, and production operations; • A closed loop drilling system will be employed; • The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts; • Temporary frac tanks placed on location will have proper secondary containment including a perimeter berm around the Working Pad Surface and containment under the frac tanks; • Flowback and stimulation fluids will be sent to enclosed tanks, separators, or other containment/filtering equipment before the fluids are placed into any pipeline storage vessel, other open top containment located on the well pad, or into tanker trucks for offsite disposal; no open top tanks will be used for initial flowback fluids containment; • Any temporary surface or permanent surface/buried pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) will be pressure tested in accordance with the 1100-series rules prior to being placed into initial service and following any reconfiguration of the pipeline network; all permanent flowlines from wellheads to separators and from the separators to the tank will also be pressure tested annually; • Tank batteries will be placed within engineered, steel secondary containment with an impervious liner system or other secondary containment systems; • Pollution control containers (spill boxes) to be used on truck loading lines within the limits of the secondary containment systems; • TEP will properly characterize and dispose of all waste streams at facilities approved for acceptance of each waste stream; • All wells located on this pad will be equipped with remote shut-in capabilities; and • The use of cathodic protection on buried steel lines to mitigate corrosion.

9	Dust control	• Pad / Road Construction: Fresh water will be periodically applied to disturbance areas during construction to minimize fugitive dust. • TEP will not use produced water or other process fluids for dust suppression. • During High Wind: Contractor will monitor wind conditions during site construction; during wind events in excess of 13 miles per hour, TEP construction contractors will apply freshwater from an approved source to the disturbance area of the pad, road, or pipeline corridor to minimize or mitigate propagation of fugitive dust; accessibility and worker safety will be considered prior to application; during periods of sustained high winds over 20 miles per hour, TEP construction contractors may temporarily suspend work to minimize potential for migration of fugitive dust, ensure worker safety, and to minimize impacts to public health, safety, welfare, the environment, and wildlife; • Road Surfacing: The existing lease road will be spot graveled during site construction to ensure there is sufficient gravel on the road to minimize fugitive dust. • Speed Restrictions: TEP has implemented speed restrictions on all lease roads and requires all TEP employees and contractors to adhere to all posted speed restrictions; the speed limit for the existing access road is and will be twenty-five (25) miles per hour; • Road Maintenance: During long-term production operations, TEP will conduct annual inspections of the existing road and will perform maintenance actions as necessary to ensure road integrity and minimize fugitive dust. Road maintenance actions may include, but not limited to, regrading, spot graveling, storm water control maintenance, and application of magnesium chloride (MgCl2) and / or fresh water. • Site Visitation: TEP will utilize telemetry equipment to minimize well site visitation when possible to reduce fugitive dust from vehicles traveling the dirt / gravel roads. • When / if sand / proppant is used during completion operations, an enclosed sand storage and delivery system will be utilized to eliminate possible fugitive sand dust emissions; and • Topsoil and stockpiled soils will be stabilized through either tackifiers, seeding practices, or erosion control blankets.	
10	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. of 65 db(A) in the hours between 7:00 a.m. to 7:00 p.m. and 60 db(A) in the hours between 7:00 p.m. to 7:00 a.m.; and • If a noise complaint is made to either TEP directly, the COGCC, or the local government, and TEP is notified of the complaint, noise levels will be measured within 48 hours of receipt of the complaint; TEP will contact the concerned party (if contact information is available) to discuss the complaint and the results of the noise measurements.	
11	Emissions mitigation	• TEP will install equipment designed specifically to aid in the mitigation of VOC emissions from this location; this equipment includes emission control devices (ECDs) and tank load out controls; if one of these pieces of equipment is not operational, facility controls will automatically shut-in the pad until the equipment is back on line; • Test separators and associated flowlines, sand traps, and emission control systems will be installed onsite to accommodate green completions techniques. • Venting/Flaring - TEP 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.	
12	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.	
13	Drilling/Completion	• Site lighting shall be shielded and directed downward, inward, away from the nearby	

	Operations	areas where wildlife may be present, and toward operations to avoid glare on nearby public roads or possible wildlife areas; • A closed loop system will be implemented during drilling; • All cuttings generated during drilling will be managed within the proposed cuttings trench prior to disposition; • The moisture content of any water/bentonite-based drilling mud (WBM) generated cuttings shall will be minimized through good engineering practices and mechanical process 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 the 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 of disposed of 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; • Recycled produced water will be utilized for well completion operations minimizing the amount of fresh water required for development of the proposed wells on this location; • TEP will use pipelines to transport water for hydraulic fracturing to and from location; • TEP will recycle or beneficially reuse flowback and produced water for use downhole; • TEP will properly characterize and dispose of all waste at the appropriate landfill/waste disposal location that allows for acceptance of the particular waste stream; • Cuttings from each well will be placed in steel containment bins. Baseline samples of the cuttings will be collected to assess constituent levels listed in COGCC Table 915-1, the cuttings pile will then be thoroughly mixed with clean fill material to create a composite of the stored materials prior to placement in the cuttings trench. This 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 7-point composite from each well may be used for preliminary analysis and waste profiling; however, discrete sample results will be required for confirmation sampling. The operator will 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 in the Form 27. 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, TEP will collect the proposed samples and analyze them for the Table 915-1 constituents; • Locally sourced fresh water will be used to minimize fugitive dust during construction, drilling, completion, and production operations.
14	Interim Reclamation	Topsoil Protection: • Protection from Contamination - based on changes in physical characteristics (e.g., organic content, color, texture, density, or consistency) soil horizons will be segregated and stockpiled separately; stockpiles of different soil types will be separated by compacted earthen berms, sediment control logs, straw bale barriers, etc.; and topsoil stockpiles will be stabilized to control erosion and sedimentation; • Protection from Compaction - topsoil stockpiles will be indicated on site with signage; stockpiles will be placed in areas away from vehicle and equipment traffic; and when stockpiling, compaction will be minimized by limiting the number of equipment passes, limiting stockpile height, and using vegetation; • Protection from Wind Erosion - surface roughening, applying hydro-seed/mulch, using soil tackifier, covering stockpiles with rolled erosion control products or other similar measures; • Protection from Water Erosion - surface roughening, applying hydro-seed/mulch, using soil tackifier, covering stockpiles with rolled erosion control products or other similar measures; and • Weed Establishment Prevention - TEP uses Cultural, Mechanical, Biological, and Chemical controls to prevent the establishment of weeds.

15	Interim Reclamation	• Interim reclamation will occur within six (6) months following completion of well drilling and completion operations; • The areas identified to be interim reclaimed will be re-contoured to blend as nearly as possible with the natural topography during site reclamation; all topsoil will be moved from the stockpile area and placed over the facility's cut and fill slopes to a uniform depth to ensure long term topsoil health including protection from erosion, prevention of weed establishment, and maintaining soil microbial activity until final reclamation; • The location will be reseeded by drill, broadcast, or hydroseed methods; drill seeding will be utilized wherever soil characteristics and slope allow for effective operation of a rangeland seed drill.; • The seed bed will be prepared on all topsoiled areas to alleviate compaction and minimize the potential for erosion; • Topsoiled areas will be planted with desirable species or a seed mixture provided by the Surface Owner for this particular location; • Protection from Wind and Water Erosion - topsoiled areas will be covered with certified weed free mulch at an application rate specified by the product's manufacturer, or a specification sheet that follows good engineering practices; and • Weed Establishment Prevention - TEP uses Cultural, Mechanical, Biological, and Chemical controls to prevent the establishment of weeds. • Erosion control will be implemented per the Stormwater Management Plan included in the Form 2A for this location and will be inspected and maintained as required by Federal, State, and Local regulation; and • Noxious weeds which may be introduced due to soil disturbance during reclamation will be treated by methods approved by the BLM Authorized Officer.

Total: 15 comment(s)

Attachment List

Att Doc Num	Name
2231002	Segregation of Leases Due to Unitization_Federal RG 298-13-1
2231004	PLAN OF DEVELOPMENT
4232202	LOCAL GOVERNMENT PERMIT
4232208	CONSULTATION SUMMARY
402932354	FORM 2A SUBMITTED
403047314	CULTURAL FEATURES MAP
403047316	LOCATION PICTURES
403047317	LOCATION DRAWING
403047319	LAYOUT DRAWING
403047321	WILDLIFE HABITAT DRAWING
403047324	HYDROLOGY MAP
403047463	ACCESS ROAD MAP
403047465	RELATED LOCATION AND FLOWLINE MAP
403047466	DIRECTIONAL WELL PLAT
403047467	GEOLOGIC HAZARD MAP
403047469	REFERENCE AREA MAP
403047472	NRCS MAP UNIT DESC
403047474	OIL AND GAS LOCATION GIS SHP
403047479	SENSITIVE AREA DATA
403047491	ECOLOGIC RESOURCE SURVEY
403050649	LESSER IMPACT AREA EXEMPTION REQUEST
403068872	CPW CONSULTATION
403068985	REFERENCE AREA PICTURES
403097577	PRELIMINARY PROCESS FLOW DIAGRAMS

Total Attach: 24 Files

General Comments

User Group	Comment	Comment Date
OGLA	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.	09/01/2022
OGLA	Based on technical review, attached revised Waste Management Plan and revised Drilling / Completion Operations BMPs.	08/31/2022
OGLA	Placed the following Best Management Practices (selected from the submitted plans and supplemental BMPs submitted by TEP in their plans and separate documents on the Form 2A): planning, pre-construction, 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.	08/12/2022
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	07/06/2022
OGLA	Operator requested a Rule 303.d. Lesser Impact Area exemption from rule 304.c.(2) Noise Mitigation Plan. Based on the distances to RBUs and High Priority Habitats, it was determined that potential impacts to resources will be so minimal as to cause no concern. Request granted by Director on 6/7/2022.	06/13/2022
OGLA	Operator requested a Rule 303.d. Lesser Impact Area exemption from rule 304.c.(3) Light Mitigation Plan. Based on the distances to RBUs and High Priority Habitats, it was determined that potential impacts to resources will be so minimal as to cause no concern. Request granted by Director on 6/7/2022.	06/13/2022

Total: 6 comment(s)

Public Comments

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

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: 402932455

Date Received: 05/16/2022

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:
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
220500097		

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: 96850
Name: TEP ROCKY MOUNTAIN LLC
Address: 1058 COUNTY ROAD 215
City: PARACHUTE State: CO Zip: 81635

Contact Information

Name: Jeff Kirtland
Phone: (970) 263-2736
Fax: ( )
email: jkirtland@terraep.com

FINANCIAL ASSURANCE

[ ] Plugging and Abandonment Bond Surety ID (Rule 706):

[ ] Gas Facility Surety ID (Rule 711):

[ ] Waste Management Surety ID (Rule 704):

LOCATION IDENTIFICATION

Name: FEDERAL Number: RG 11-13-298

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: LOT 4 Section: 13 Township: 2S Range: 98W Meridian: 6 Ground Elevation: 6618

Latitude: 39.882228 Longitude: -108.346510

GPS Quality Value: 1.7 Type of GPS Quality Value: PDOP Date of Measurement: 07/21/2021

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 #
☐		

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: RIO BLANCO 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? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: Yes

Date Relevant Local Government permit application submitted: 04/26/2022

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

Status/disposition date: 04/29/2022

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: Edward Smercina Contact Phone: 970-878-9586

Contact Email: edward.smercina@rbc.us

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: 04/27/2022

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location: Not yet submitted

Status/disposition Date: 06/06/2022

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: Matthew Dupire Contact Phone: 970-878-3839

Contact Email: mdupire@blm.gov Field Office: White River Field Office, Meeker Colorado

Additional explanation of local and/or federal process:

TEP will be acquiring 4 new BLM Right-of-Way Grants for the following: the proposed off-lease wells, the proposed access to the the Federal RG 11-13-298 pad, the proposed 6" produced water pipeline and for the proposed frac pipelines. Bargath will obtain the ROW for the proposed 8" natural gas pipeline. The existing ROW (COC-80226) will be used for the RGU 23-7-297 remote frac pad. Also, twenty-two BLM APDs will be submitted for the proposed directional natural gas wells.

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)? Yes

Date of local government consultation: 04/07/2021

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? Yes

Date of federal consultation: 04/07/2021

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: Bureau of Land Management Phone: 970-878-3800

Address: White River Field Office Fax:

Address: 220 East Market Street Email: mdupire@blm.gov

City: Meeker State: CO Zip: 81641

Surface Owner at this Oil and Gas Location: ☐ Fee ☐ State ☒ Federal ☐ Indian

Check only one:

☐ 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: Yes

Lease description if necessary: Oil & Gas Lease COC-0003453

SITE EQUIPMENT LIST

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

Wells	22	Oil Tanks	0	Condensate Tanks	4	Water Tanks	6	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	26	Injection Pumps	0	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	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	4
Meter/Sales Building	0	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Air Compressor / Dual Fuel Gen	1
Chemical Tank - 135 gal	1
Dual Fuel Generator	1
Chemical Pumps	5
Produced Water Transfer Pumps	1
Chemical Tanks - 500 gal	4
Gun Barrel Tanks - 500 bbl	2

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Emissions Comb. Device (LP) - FB	1
Enclosed Water Tanks - 500 bbl - FB	3
Water Transfer Pump - FB	1
Low Pressure P-Tank 500 bbl - FB	1
Temporary Buy-Back Meter	1
High Pressure 4 Phase Sep. - FB	2

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.

Off Location Flowline Installations:
1 - 8" Steel Gas Gathering Pipeline, approx. 4,082 ft.
1 - 6" Water Pipeline, Coreline or Flexsteel, approx. 4,006 ft.

Off Location Flowline Temporary Installations:
5 - 4.5" Temporary Steel Surface Frac Lines - approx. 15,972 ft.

On Location Flowline Installations:
22 - 2" Coated Steel Wellhead Lines - approx. 200 ft.
3 - 2" Coated Steel Surface Condensate Dump Line - approx. 315 ft.
1 - 2" Coated Steel Surface Water Dump Line - approx. 248 ft.
1 - 2" Coated Steel Surface Water Vent Line - approx. 22 ft.
1 - 2" Coated Steel Surface Water Blowdown Line - approx. 204 ft.
1 - 4" Aluminum ECD Surface Process Piping - approx. 111 ft.
1 - 1" Coated Steel Surface Fuel Gas Line/ECD - approx. 110 ft.
1 - 1" Coated Steel Surface Fuel Gas Line/Tank Burners - approx. 182 ft.
1 - 2" Coated Steel Rig Fuel Gas Line - approx. 200 ft.

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:	5280 Feet	SE					
Residential Building Unit (RBU):	5280 Feet	SE	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280 Feet	NE	☐	☐	☐		☐
Designated Outside Activity Area:	5280 Feet	NE					
Public Road:	3989 Feet	NW					
Above Ground Utility:	3967 Feet	NW					
Railroad:	5280 Feet	NW					
Property Line:	2121 Feet	N					
School Facility:	5280 Feet	NE					
Child Care Center:	5280 Feet	NE					
Disproportionately Impacted (DI) Community:	5280 Feet	SE					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet	NE	☐	☐	☐		☐

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: 8.15

Size of location after interim reclamation in acres: 1.54

Estimated post-construction ground elevation: 6618

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:

The current land use for this property is considered rangeland / recreational. The property in the immediate vicinity of this Oil and Gas Location is primarily used for cattle grazing but is also periodically used for recreation, including hunting.

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

Rio Blanco County has a zoning designation of "agricultural" for this property.

Describe any applicable Federal land use designation:

The proposed Federal RG 11-13-298 pad is located on Federal surface administered by the BLM WRFO. The current land use for this property is considered rangeland / recreational. The property in the immediate vicinity of this Oil and Gas Location is primarily used for cattle grazing but is also periodically used for recreation, including hunting. The surface owner does not intend to modify the current land use.

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):

The current land use for this property is considered rangeland / recreational. The property in the immediate vicinity of this Oil and Gas Location is primarily used for cattle grazing but is also periodically used for recreation, including hunting. The surface owner does not intend to modify the current land use. Therefore, the final land use designation will remain as rangeland / recreational.

Reference Area Latitude: 39.881167 Reference Area Latitude: -108.346788

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

Plant Community	Dominant vegetation
Shrub Land	Pinyon/Juniper Woodlands
Shrub Land	Wyoming Sagebrush

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: 73 - Rentsac channery loam, 5 to 50 percent slopes

NRCS Map Unit Name:

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: 4069 Feet N

Spring or Seep: 5280 Feet N

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 100 Feet

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

Hydrogeological indicators do not support the occurrence of shallow groundwater at the site, depth to groundwater is probably greater than 100 feet in the underlying bedrock. (Sensitive Area Determination Checklist - WestWater Engineering 8/17/2021)

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 1497 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: 1497 Feet E

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

Intermittent 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:

- [ ] 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:

☒ A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: 04/07/2021

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):

< No row provided >

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?

NA

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?

NA

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	BLACK BEAR	Wildlife - Avoidance	The operator agrees to report bear conflicts immediately to CPW staff.
2	BLACK BEAR	Wildlife - Avoidance	TEP will install and utilized bear proof dumpsters and trash receptacles for food- related trash at all facilities that generate trash.
3	RAPTORS	Wildlife - Minimization	Exclusionary devices will be installed to prevent bird and other wildlife from access equipment stacks, vents, and openings.
4	RAPTORS	Wildlife - Minimization	TEP will conduct vegetation removal activities outside the migratory bird nesting season (April 1 – August 30). If vegetation removal must occur during the nesting season, TEP will implement hazing or other exclusionary measures prior to April 1 to avoid take of migratory birds. Alternatively, TEP may conduct a migratory bird survey prior to vegetation removal as required by COGCC Rule 1202.a.(8) to avoid take of migratory birds.
5	MULE DEER & ELK	Wildlife - Avoidance	The operator agrees to reclaim mule deer and elk habitats with CPW-identified native shrubs, grasses, and forbs appropriate to the ecological site disturbed.
6	MULE DEER & ELK	Wildlife - Minimization	To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions. During post-development production operations, TEP will make best efforts to minimize operations at this location during winter months by maximizing operations when possible between 9:00am to 4:00pm when wildlife activity minimal.
7	MULE DEER & ELK	Wildlife - Minimization	Certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife will be used. TEP will use certified, weed free grass hay, straw, hay or other mulch materials used for the reseeding and reclamation of disturbed areas.

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: 12

- [ ] (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)
- [X] (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	TEP Rocky Mountain LLC (“TEP”) is proposing to drill, complete, and operate twenty-two (22) directional natural gas wells from the new oil and gas location, Federal RG 11-13-298 pad. As described under Rule 304.b.(2).A, an Alternative Location Analysis (ALA) is only required for an Oil and Gas Location that "meets any of the criteria listed in Rule 304.b.(2).B." The Federal RG 11-13-298 pad does not meet any of these requirements and therefore an ALA is not required. The following 304.c Plans are not required for this submittal: Emergency Spill Response Program - Location not w/in 2640' of groundwater under the direct influence of a surface water well or Type III well or surface water that is 15 miles or less upstream from a PWS intake. Odor Mitigation Plan - Location is not w/in 2000' of a BU or DOAA. Transportation Plan - Rio Blanco County does not require the plan. Flood Shut-in Plan - Location is not w/in a flood plain. Hydrogen Sulfide Drilling Plan - Do not expect to encounter H2S during drilling. Community Outreach Plan - Location is not w/in 2000' of a RBU, HOBU, or school located w/in a DIC. Gas Capture Plan - Will connect to a mid stream gas gathering system prior to commencement of production ops. Geologic Hazard Plan - A Geologic Hazard Map and Report is attached.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 05/16/2022 Email: vschoeber@terraep.com

Print Name: Vicki Schoeber Title: Regulatory Specialist

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	• Prior to submittal of the APDs, Form 2, and the Form 2A, TEP conducted on-sites and meetings with the Bureau of Land Management (BLM), Colorado Parks and Wildlife (CPW), and Rio Blanco County. These on-sites and meetings were held to discuss TEP's proposed development plan for the Federal 298-13-1 pad and associated support facilities. Changes were made to the proposed development plan based on feedback received from all stakeholders and included in the APD. • The development plan for the Federal 298-13-1 pad was prepared to minimize surface impacts to the greatest extent possible through the development of multiple wells from one location by utilizing directional drilling technology and utilizing existing facilities and infrastructure where possible, which minimizes the surface area needed to conduct operations on the oil and gas location. • Existing infrastructure operated by Williams and TEP will be utilized for transportation of natural gas and produced water to minimize the surface disturbance required for tying into gathering facilities.
2	Planning	• Per the Colorado Department of Public Health and Environment ("CDPHE") Air Pollution Control Division ("APCD") requirements, TEP will implement ambient air quality monitoring on site during drilling, completion, and the first six (6) months of production operations; an air monitoring plan will be submitted 60 days prior to start of drilling operations; • TEP will properly maintain vehicles and equipment; • Other than safety devices, TEP will use non-emitting pneumatic controllers; and • TEP will have adequate and committed pipeline take away capacity for all produced gas.
3	Pre-Construction	• Prior to commencement of construction activities, TEP will hold a pre-construction meeting with contractors to review proposed site construction and installation of stormwater control measures. The site will be staked for construction prior to the preconstruction meeting. Staking will identify the boundaries of the proposed site to protect existing vegetation in areas that should not be disturbed.

4	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 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; and • TEP will follow manufacturers' recommendations and company policies for proper use and disposal of products.	
5	Wildlife	• TEP will inform and educate all employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife; • TEP will install a proposed water pipeline from the Oil and Gas Location to TEP's existing water management system to minimize truck traffic to the location and minimizing potential impacts to wildlife; • TEP will minimize direct impacts to wildlife habitat by utilizing existing infrastructure and disturbance corridors whenever possible; and • Well telemetry equipment will be installed to minimize site visitation through remote monitoring of production operations.	
6	Material Handling and Spill Prevention	• Audio, Visual, and Olfactory (AVO) inspections: AVO inspections will be conducted monthly at the Federal 298-13-1 oil and gas location throughout the life of the location. • Routine inspection of all production equipment, wellheads, temporary equipment, etc.; As described above, routine inspections to be conducted at the Federal 298-13-1 oil and gas location will include: Routine physical inspections of production equipment (by TEP production personnel); Air Compliance inspections and monitoring (by TEP Air Compliance staff); SPCC Inspections (by 3rd party contractor), Storm Water Management inspections (by 3rd party contractor), and continuous, dedicated SCADA monitoring of fluid production rates and pressures, and fluid storage volumes (by TEP production personnel). • As part of our LDAR, STEM, ooooa inspection / compliance programs, TEP will adhere to the use of Approved Instrument Monitoring Methods (AIMM) for inspecting production equipment and facilities at the Federal 298-13-1 oil and gas location. • Spill prevention training is provided to all field employees on a monthly basis. The monthly training consists of reviewing past incidents, root causes of the incidents, and what specific actions (lessons learned) could be taken to prevent the reoccurrence of such incidents in the future. • Flowlines will be integrity-tested per the 1100 Series rules. • TEP spill response procedures will be adhered to for any spills or releases occurring at the Federal 298-13-1 oil and gas location. All spills will be managed in accordance with the COGCC 900 Series rules. • Leak Detection and Repair (LDAR) inspections are performed at all locations; however, the inspection frequency is tiered based upon the level of emission controls that are required / employed at each location. • Storage Tank Emission Monitoring (STEM) inspections are performed monthly at any location where emissions must be controlled (> 2 tpy). • OOOOa inspections are performed semi-annually on any facility constructed after 2015. • Flare Logs are completed daily for all locations where active flares and emissions controls are required. • Spill prevention training will be provided to all field employees on an annual basis; • Any leaks or spills detected during monitoring will be reported within 24 hours in accordance with Rule 912.b; • Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Inspection and record retention of flowline testing will be in accordance per COGCC regulation; all records will be made available to the COGCC upon request; • All load lines will be bull plugged or capped; • All on-location flowlines will be inspected and tested per Rule 1104; • All equipment deficiencies will be corrected immediately or as soon as practical (all identified problems and corrections/repairs will be documented and records will be maintained in the TEP's office); • TEP will track and clean up all spills, including those that are not reportable; • TEP will temporarily shut in all production wells on the pad in the event of any upset condition;	

		• All piping is pressure tested and inspected for leaks prior to flowback; and • Automation technology will be utilized at this location; this technology includes the use of fluid level monitoring for the tanks and high-level shut offs.
7	Material Handling and Spill Prevention	• If PFAS-containing foam is used at a location, TEP will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions; • If PFAS-containing foam is used at a location, TEP will properly capture and dispose of PFAS contaminated soil and fire and flush water; and • If PFAS-containing foam is used at a location: TEP will properly characterize the site to determine the level, nature and extent of contamination.
8	Material Handling and Spill Prevention	Water Resource Protection: • Informal inspections of all tanks and storage facilities will occur daily during drilling, completions, and production operations; • A closed loop drilling system will be employed; • The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts; • Temporary frac tanks placed on location will have proper secondary containment including a perimeter berm around the Working Pad Surface and containment under the frac tanks; • Flowback and stimulation fluids will be sent to enclosed tanks, separators, or other containment/filtering equipment before the fluids are placed into any pipeline storage vessel, other open top containment located on the well pad, or into tanker trucks for offsite disposal; no open top tanks will be used for initial flowback fluids containment; • Any temporary surface or permanent surface/buried pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) will be pressure tested in accordance with the 1100-series rules prior to being placed into initial service and following any reconfiguration of the pipeline network; all permanent flowlines from wellheads to separators and from the separators to the tank will also be pressure tested annually; • Tank batteries will be placed within engineered, steel secondary containment with an impervious liner system or other secondary containment systems; • Pollution control containers (spill boxes) to be used on truck loading lines within the limits of the secondary containment systems; • TEP will properly characterize and dispose of all waste streams at facilities approved for acceptance of each waste stream; • All wells located on this pad will be equipped with remote shut-in capabilities; and • The use of cathodic protection on buried steel lines to mitigate corrosion.

9	Dust control	• Pad / Road Construction: Fresh water will be periodically applied to disturbance areas during construction to minimize fugitive dust. • TEP will not use produced water or other process fluids for dust suppression. • During High Wind: Contractor will monitor wind conditions during site construction; during wind events in excess of 13 miles per hour, TEP construction contractors will apply freshwater from an approved source to the disturbance area of the pad, road, or pipeline corridor to minimize or mitigate propagation of fugitive dust; accessibility and worker safety will be considered prior to application; during periods of sustained high winds over 20 miles per hour, TEP construction contractors may temporarily suspend work to minimize potential for migration of fugitive dust, ensure worker safety, and to minimize impacts to public health, safety, welfare, the environment, and wildlife; • Road Surfacing: The existing lease road will be spot graveled during site construction to ensure there is sufficient gravel on the road to minimize fugitive dust. • Speed Restrictions: TEP has implemented speed restrictions on all lease roads and requires all TEP employees and contractors to adhere to all posted speed restrictions; the speed limit for the existing access road is and will be twenty-five (25) miles per hour; • Road Maintenance: During long-term production operations, TEP will conduct annual inspections of the existing road and will perform maintenance actions as necessary to ensure road integrity and minimize fugitive dust. Road maintenance actions may include, but not limited to, regrading, spot graveling, storm water control maintenance, and application of magnesium chloride ($MgCl_2$) and / or fresh water. • Site Visitation: TEP will utilize telemetry equipment to minimize well site visitation when possible to reduce fugitive dust from vehicles traveling the dirt / gravel roads. • When / if sand / proppant is used during completion operations, an enclosed sand storage and delivery system will be utilized to eliminate possible fugitive sand dust emissions; and • Topsoil and stockpiled soils will be stabilized through either tackifiers, seeding practices, or erosion control blankets.	
10	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. of 65 db(A) in the hours between 7:00 a.m. to 7:00 p.m. and 60 db(A) in the hours between 7:00 p.m. to 7:00 a.m.; and • If a noise complaint is made to either TEP directly, the COGCC, or the local government, and TEP is notified of the complaint, noise levels will be measured within 48 hours of receipt of the complaint; TEP will contact the concerned party (if contact information is available) to discuss the complaint and the results of the noise measurements.	
11	Emissions mitigation	• TEP will install equipment designed specifically to aid in the mitigation of VOC emissions from this location; this equipment includes emission control devices (ECDs) and tank load out controls; if one of these pieces of equipment is not operational, facility controls will automatically shut-in the pad until the equipment is back on line; • Test separators and associated flowlines, sand traps, and emission control systems will be installed onsite to accommodate green completions techniques. • Venting/Flaring - TEP 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.	
12	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.	
13	Drilling/Completion	• Site lighting shall be shielded and directed downward, inward, away from the nearby	

	Operations	areas where wildlife may be present, and toward operations to avoid glare on nearby public roads or possible wildlife areas; • A closed loop system will be implemented during drilling; • All cuttings generated during drilling will be managed within the proposed cuttings trench prior to disposition; • The moisture content of any water/bentonite-based drilling mud (WBM) generated cuttings shall will be minimized through good engineering practices and mechanical process 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 the 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 of disposed of 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; • Recycled produced water will be utilized for well completion operations minimizing the amount of fresh water required for development of the proposed wells on this location; • TEP will use pipelines to transport water for hydraulic fracturing to and from location; • TEP will recycle or beneficially reuse flowback and produced water for use downhole; • TEP will properly characterize and dispose of all waste at the appropriate landfill/waste disposal location that allows for acceptance of the particular waste stream; • Cuttings from each well will be placed in steel containment bins. Baseline samples of the cuttings will be collected to assess constituent levels listed in COGCC Table 915-1, the cuttings pile will then be thoroughly mixed with clean fill material to create a composite of the stored materials prior to placement in the cuttings trench. This 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 7-point composite from each well may be used for preliminary analysis and waste profiling; however, discrete sample results will be required for confirmation sampling. The operator will 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 in the Form 27. 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, TEP will collect the proposed samples and analyze them for the Table 915-1 constituents; • Locally sourced fresh water will be used to minimize fugitive dust during construction, drilling, completion, and production operations.
14	Interim Reclamation	Topsoil Protection: • Protection from Contamination - based on changes in physical characteristics (e.g., organic content, color, texture, density, or consistency) soil horizons will be segregated and stockpiled separately; stockpiles of different soil types will be separated by compacted earthen berms, sediment control logs, straw bale barriers, etc.; and topsoil stockpiles will be stabilized to control erosion and sedimentation; • Protection from Compaction - topsoil stockpiles will be indicated on site with signage; stockpiles will be placed in areas away from vehicle and equipment traffic; and when stockpiling, compaction will be minimized by limiting the number of equipment passes, limiting stockpile height, and using vegetation; • Protection from Wind Erosion - surface roughening, applying hydro-seed/mulch, using soil tackifier, covering stockpiles with rolled erosion control products or other similar measures; • Protection from Water Erosion - surface roughening, applying hydro-seed/mulch, using soil tackifier, covering stockpiles with rolled erosion control products or other similar measures; and • Weed Establishment Prevention - TEP uses Cultural, Mechanical, Biological, and Chemical controls to prevent the establishment of weeds.

15	Interim Reclamation	• Interim reclamation will occur within six (6) months following completion of well drilling and completion operations; • The areas identified to be interim reclaimed will be re-contoured to blend as nearly as possible with the natural topography during site reclamation; all topsoil will be moved from the stockpile area and placed over the facility's cut and fill slopes to a uniform depth to ensure long term topsoil health including protection from erosion, prevention of weed establishment, and maintaining soil microbial activity until final reclamation; • The location will be reseeded by drill, broadcast, or hydroseed methods; drill seeding will be utilized wherever soil characteristics and slope allow for effective operation of a rangeland seed drill.; • The seed bed will be prepared on all topsoiled areas to alleviate compaction and minimize the potential for erosion; • Topsoiled areas will be planted with desirable species or a seed mixture provided by the Surface Owner for this particular location; • Protection from Wind and Water Erosion - topsoiled areas will be covered with certified weed free mulch at an application rate specified by the product's manufacturer, or a specification sheet that follows good engineering practices; and • Weed Establishment Prevention - TEP uses Cultural, Mechanical, Biological, and Chemical controls to prevent the establishment of weeds. • Erosion control will be implemented per the Stormwater Management Plan included in the Form 2A for this location and will be inspected and maintained as required by Federal, State, and Local regulation; and • Noxious weeds which may be introduced due to soil disturbance during reclamation will be treated by methods approved by the BLM Authorized Officer.

Total: 15 comment(s)

Attachment List

Att Doc Num	Name
2231001	Segregation of Leases Due to Unitization_Federal RG 11-13-298
2231003	PLAN OF DEVELOPMENT
4232201	PRELIMINARY PROCESS FLOW DIAGRAMS
4232203	LOCAL GOVERNMENT PERMIT
4232205	CONSULTATION SUMMARY
402932455	FORM 2A SUBMITTED
403047703	CULTURAL FEATURES MAP
403047706	LOCATION PICTURES
403047707	LOCATION DRAWING
403047709	LAYOUT DRAWING
403047712	WILDLIFE HABITAT DRAWING
403047718	HYDROLOGY MAP
403047722	ACCESS ROAD MAP
403047727	RELATED LOCATION AND FLOWLINE MAP
403047730	DIRECTIONAL WELL PLAT
403047735	REFERENCE AREA MAP
403047740	NRCS MAP UNIT DESC
403047743	OIL AND GAS LOCATION GIS SHP
403047750	SENSITIVE AREA DATA
403047754	ECOLOGIC RESOURCE SURVEY
403047916	GEOLOGIC HAZARD MAP
403050633	LESSER IMPACT AREA EXEMPTION REQUEST
403068871	CPW CONSULTATION
403068989	REFERENCE AREA PICTURES

Total Attach: 24 Files

General Comments

User Group	Comment	Comment Date
OGLA	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.	09/01/2022
OGLA	Based on technical review, attached revised Waste Management Plan and revised Drilling / Completion Operations BMPs.	08/31/2022
OGLA	Placed the following Best Management Practices (selected from the submitted plans and supplemental BMPs submitted by TEP in their plans and separate documents on the Form 2A): planning, pre-construction, 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.	08/12/2022
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	07/06/2022
OGLA	Operator requested a Rule 303.d. Lesser Impact Area exemption from rule 304.c.(2) Noise Mitigation Plan. Based on the distances to RBUs and High Priority Habitats, it was determined that potential impacts to resources will be so minimal as to cause no concern. Request granted by Director on 6/7/2022.	06/13/2022
OGLA	Operator requested a Rule 303.d. Lesser Impact Area exemption from rule 304.c.(3) Light Mitigation Plan. Based on the distances to RBUs and High Priority Habitats, it was determined that potential impacts to resources will be so minimal as to cause no concern. Request granted by Director on 6/7/2022.	06/13/2022

Total: 6 comment(s)

Public Comments

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