

St Croix Operating, Inc.
Dune OGD
Section 28, T1N R50W
Washington County, Colorado

EMERGENCY RESPONSE PLAN

St Croix Operating, LLC (St Croix) proposes with this plan to construct two new locations in Washington County, Colorado. The first location is the Dune #1, a new proposed well pad with one new well. The second location covered in this plan is the Dune Production Facility, which will produce the Dune #1 well and will also have an injection well on location, the Dune SWD #2.

This plan has been drafted to comply with COGCC Rules 304.c.(8) and Rule 602.j.

1. Local Responder Coordinating Agency and Contact Information

This location is in Washington County, Colorado, in the Otis Rural Fire District.

The plan was reviewed and received concurrence from Washington County on September 1, 2022. Please see the attached email correspondence.

Washington County Emergency Manager

100% Full-time

Contact: Bryant McCall
970-630-8662
150 Ash Avenue
Akron, CO 80720

Otis Volunteer Fire Department

100% Volunteer

Contact: (970) 848-0464
504 5th AVE
Otis, CO 80743

Yuma District Hospital

100% Full-time

Contact: (970) 848-5405
1000 W. 8th Ave.
Yuma, CO 80759

2. Operator Emergency Contact Number

Contact: Paul Melnychenko
St Croix Operating, Inc
532 West 66th St
Loveland, CO 80538

3. Local Responder Mutual Aid Agencies

Otis Rural Fire Protection District	100% Volunteer
Southwest Washington County Fire District	100% Volunteer
Washington County Sheriff	100% Paid

4. Potential Impacts to the Environment and Nearby Population

This location is located approximately 2,017 feet from the nearest building. It is 594 feet west of a public road. In the event of an emergency, there should be minimal impacts to nearby populations. There are no immediate potential environmental impacts to waterways or water bodies.

5. Health and Safety Action Levels

a. Decontamination

- i. St. Croix will have eyewash stations and freshwater available onsite if there are chemicals in use on location that could be hazardous on skin contact.

b. Staging Areas

- i. Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road 32.

6. Site Specific Information

Location Information	
Location Name	Dune #1
COGCC Location ID	Pending
Location Legal Description	SENE Section 28, T1N R50W
Location Latitude and Longitude	40.02760, -102.96641
Directions to location from Otis Rural Fire Protection District, Colorado	Head west on E 5 th Ave toward Logan St. for approximately 52 feet. Turn left at the first cross street onto Logan St. Travel 0.3 miles and turn right onto US-34 W/1 st Ave. Travel another 0.3 miles then turn left onto Co Rd RR/Dade St. and follow that south for approximately

	8.4 miles, then turn right on CO RD 32 until you reach the access road on the south side of the road. Follow the access road for 1,977.7 feet until you reach the proposed location.
Description of Site Setting	This location is sited in rangeland. There are no immediate potential impacts to waterways or water bodies.
Description of Location Equipment, Fluids, and Potential Hazards	<p>This location will contain a wellhead and an off-location flowline that will parallel the access road to the north.</p> <p>Potential hazards would be a leak from the flowline.</p>
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The off-location flowline undergoes Audio-Visual-Olfactory inspections monthly and annual pressure testing to ensure integrity of the line.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road 32.

Location Information	
Location Name	Dune Production Facility / SWD #2
COGCC Location ID	Pending
Location Legal Description	NWNE Section 28, T1N R50W
Location Latitude and Longitude	40.03068, -102.96969
Directions to location from Otis, Colorado	Head west on E 5 th Ave toward Logan St. for approximately 52 feet. Turn left at the first cross street onto Logan St. Travel 0.3 miles and turn right onto US-34 W/1 st Ave. Travel another 0.3 miles then turn left onto Co Rd RR/Dade St. and follow that south for approximately 8.4 miles, then turn right on CO RD 32 until you reach the access road on the south side of the road. Follow the access

	road for about 421 feet until you reach the proposed location.
Description of Site Setting	This location is sited in rangeland. There are no immediate potential impacts to waterways or water bodies.
Description of Location Equipment, Fluids, and Potential Hazards	This location will contain 1 wellhead and production equipment.
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The off-location flowline undergoes Audio-Visual-Olfactory inspections monthly and annual pressure testing to ensure integrity of the line.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road 32.

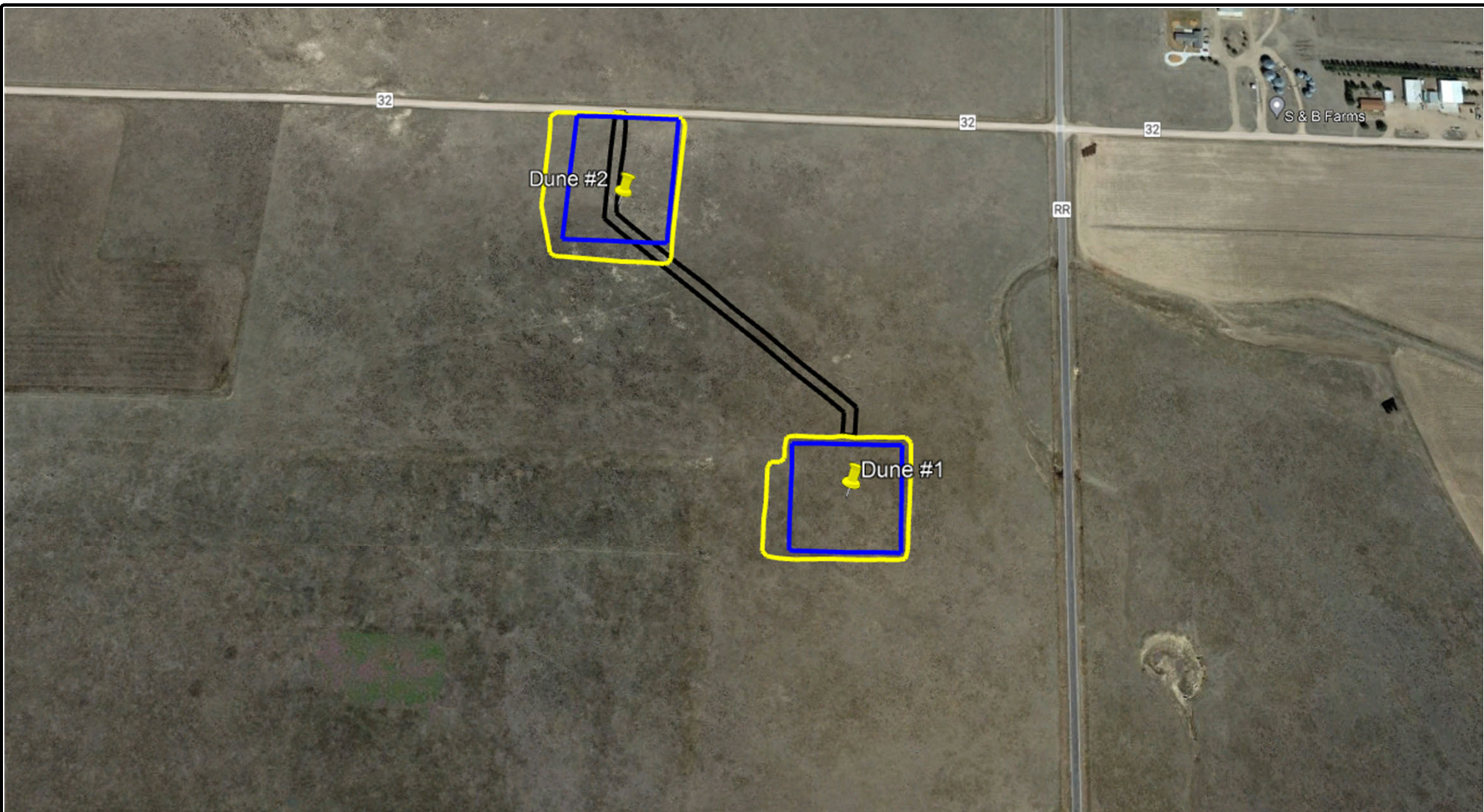
Attachments:

Oil and Gas Location Layout Drawings

Emergency Route Maps


Access Road Maps

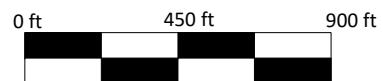
Washington County Emergency Manager Concurrence with Plan



St. Croix Operating, Inc.
Dune Project
S28 T1N R50W
Emergency Route Map

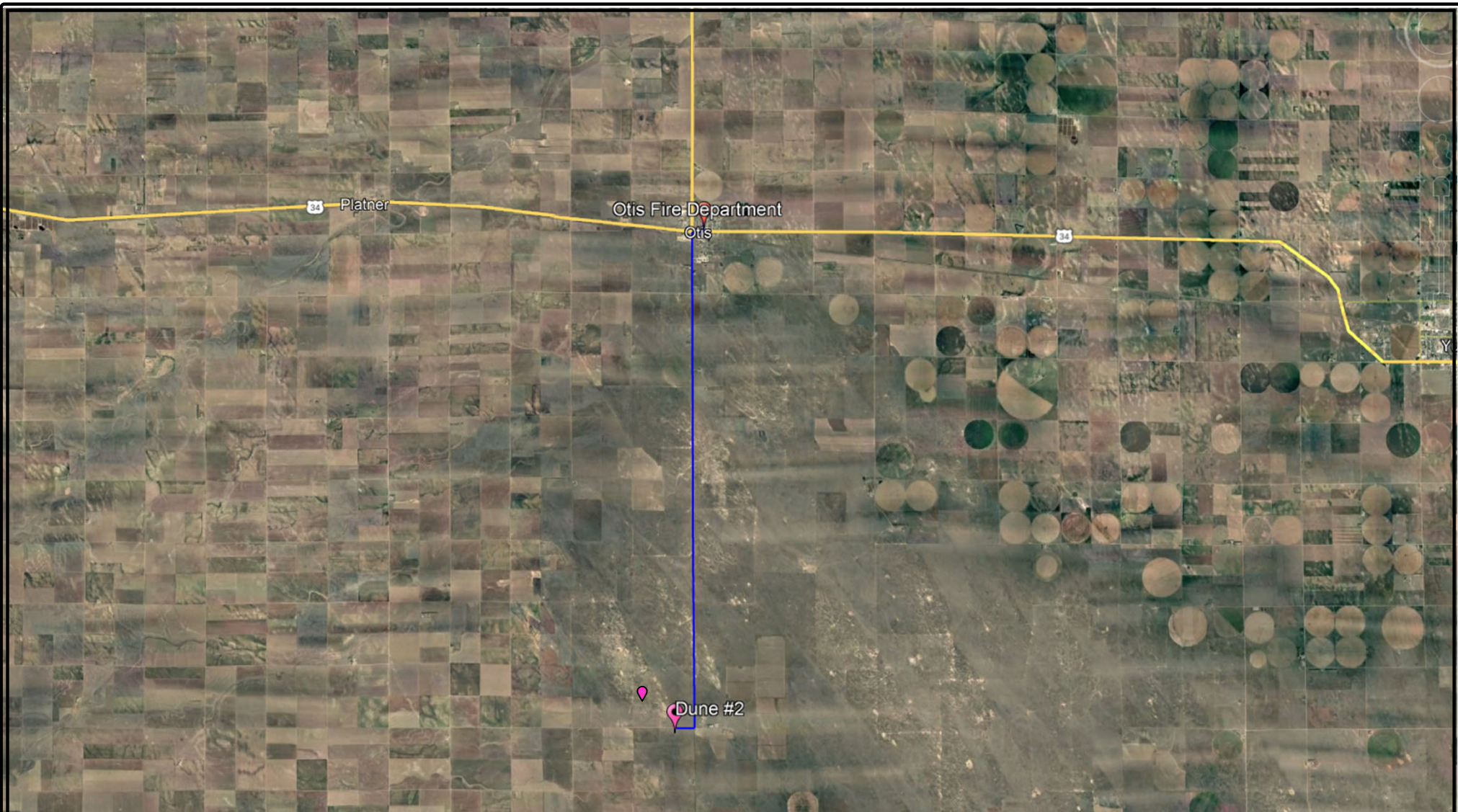
Legend

 Proposed Access Road



Prepared By:
Ardor Environmental LLC

October 28, 2022

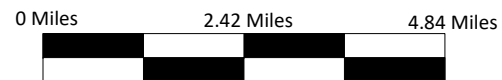


St. Croix Operating, Inc.
Dune Project
S28 T1N R50W
Emergency Route Map

Legend



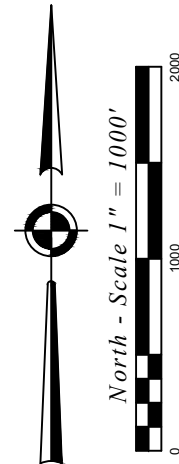
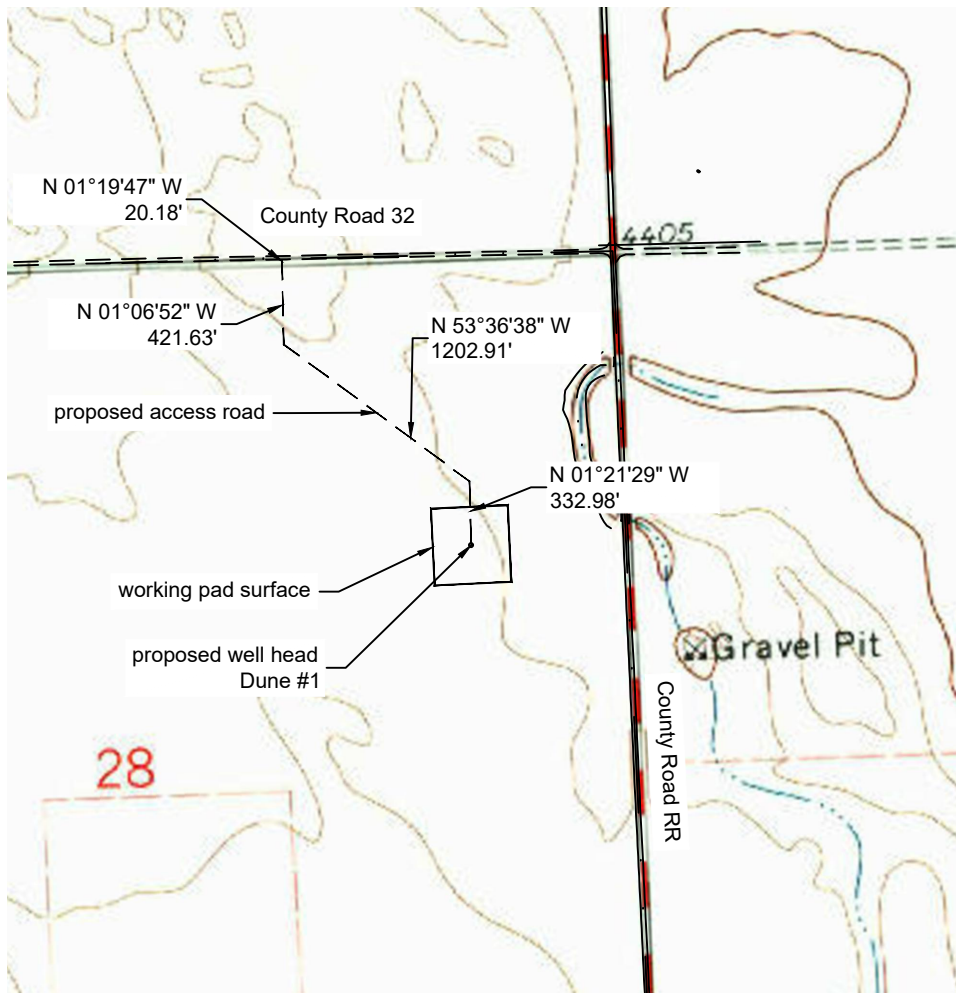
Emergency Route



Prepared By:
Ardor Environmental LLC

January 20, 2022

Access Road Map



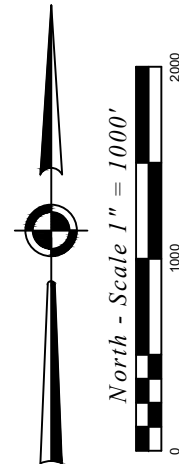
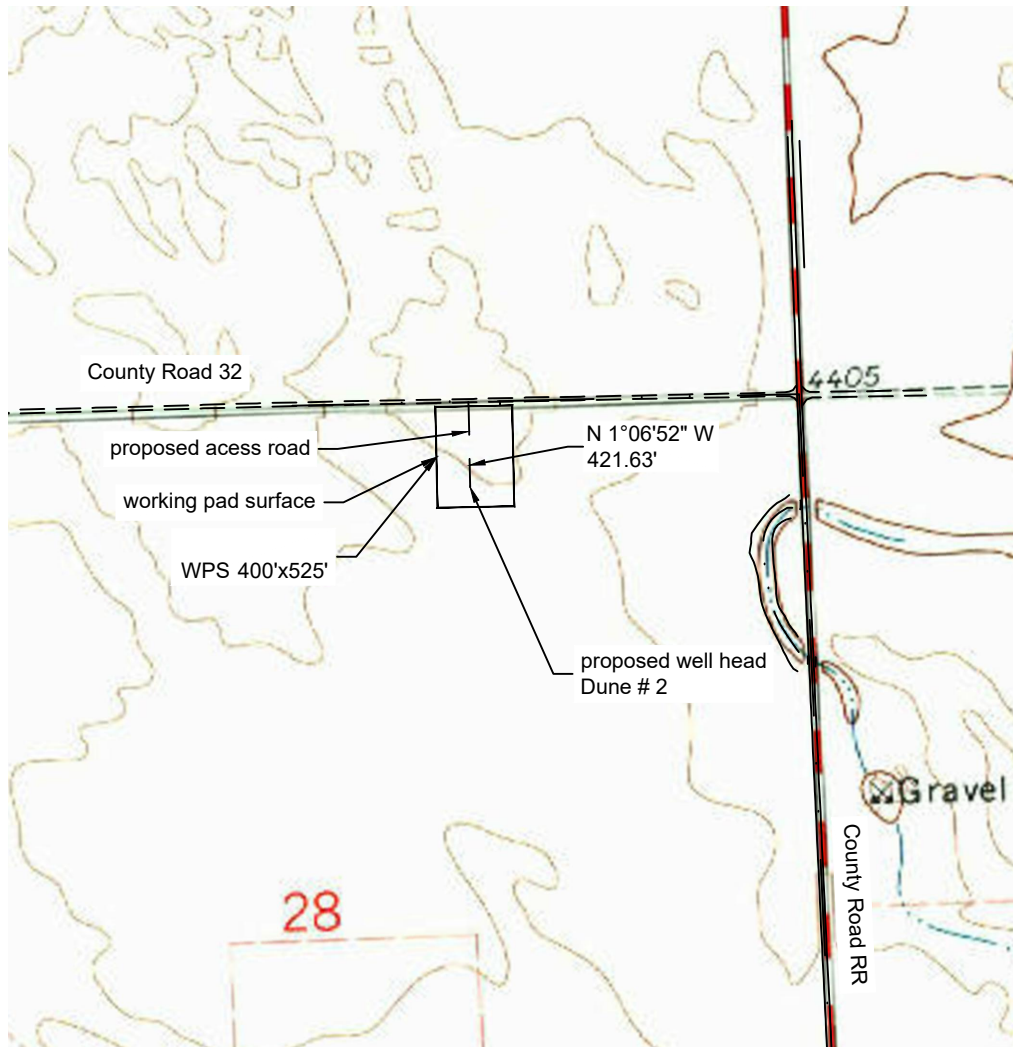
Distance from Proposed Well to nearest :		Direction:
Building:	2281'	NE
Building Unit:	2281'	NE
High Occupancy Building Unit:	5280'	W
Designated Outside Activity Area:	5280'	W
Public Road:	795'	E
Aboveground Utility:	1549'	N
Railroad:	5280'	S
Property Line:	807'	E
School Facility:	5280'	N
School Property Line:	5280'	N
Child Care Center:	5280'	N
RBU or HOBV within DI Comm:	5280'	N

Distance from Proposed drill pad to nearest :		Direction
Building:	2004'	NE
Residential Building Unit:	2004'	NE
High Occupancy Building Unit:	5280'	W
Designated Outside Activity Area:	5280'	W
Public Road:	594'	E
Aboveground Utility:	1338'	N
Railroad:	5280'	S
Property Line:	607'	E
School Facility:	5280'	N
Disproportionately Impacted Comm:	5280'	N
Child Care Center:	5280'	N
RBU or HOBV within DI Comm:	5280'	N

C:\Users\plsc\OneDrive\for Brett\21131\dwg\21131_R1_ACC.dwg January 10, 2022 ~ 1:00pm

Well Name: Dune #1	Field Date 11.11.2021	Prepared for: St Croix Operating, LLC
	Party Chief BAB	
	Survey Tech N/A	
	Proj. Manager BAB	
S28-T01N-R50W-6 PM		PLS Corporation 532 West 66th Street Loveland, Colorado 80538 970.669.2100 - info@plscorporation.com
Washington County, CO		

Access Road Map



Distance from Proposed Well to nearest :		Direction:
Building:	2343'	E
Building Unit:	2343'	E
High Occupancy Building Unit:	5280'	N
Designated Outside Activity Area:	5280'	N
Public Road:	440'	N
Aboveground Utility:	476'	N
Railroad:	5280'	S
Property Line:	443'	N
School Facility:	5280'	N
School Property Line:	5280'	N
Child Care Center:	5280'	N
RBH or HOBH within DI Comm:	5280'	N

Distance from Proposed drill pad to nearest :		Direction
Building:	2000'	E
Residential Building Unit:	2000'	E
High Occupancy Building Unit:	5280'	N
Designated Outside Activity Area:	5280'	N
Public Road:	19'	N
Aboveground Utility:	55'	N
Railroad:	5280'	S
Property Line:	22'	N
School Facility:	5280'	N
Disproportionately Impacted Comm:	5280'	N
Child Care Center:	5280'	N
RBH or HOBH within DI Comm:	5280'	N

C:\Users\plscg\OneDrive\for Brett\21132\dwg\21132_ACC.dwg December 27, 2021 - 11:55am

Well Name: Dune Production Facility/Dune SWD #2		Field Date 11.29.2021	Prepared for: St Croix Operating, LLC	Project#: 21132.001
S28-T01N-R50W-6 PM		Party Chief BAB		
Washington County, CO		Survey Tech N/A	PLS Corporation 532 West 66th Street Loveland, Colorado 80538 970.669.2100 - info@plscorporation.com	
		Proj. Manager BAB		

From: [Bryant McCall](#)
To: apetzold@ardorenvironmental.com
Cc: [Jessica Donahue](#)
Subject: Re: Review & Signature Requested - St. Croix Dune OGDG ERP
Date: Thursday, September 1, 2022 10:36:33 AM

This plan looks good. I did not see anywhere to sign it but I would approve of this with no changes.

On Thu, Sep 1, 2022 at 10:14 AM <apetzold@ardorenvironmental.com> wrote:

Good morning,

Please see attached a draft of St. Croix's Emergency Response Plan for the Dune Oil and Gas Development Plan being applied for with Colorado Oil and Gas Conservation Commission. Please review, sign and return. If you have questions or concerns, please reach out.

Thank you,

Amanda Petzold

Permitting Specialist

(970) 415-1466

apetzold@ardorenvironmental.com



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Bryant McCall
Washington County OEM
oem@co.washington.co.us
1-970-630-8662