

FORM
2A

Rev
05/22

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:

403161663

(SUBMITTED)

Date Received:

09/30/2022

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

OGDP ID:

Expiration Date:

☒ 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
220900251		

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: 47120

Name: KERR MCGEE OIL & GAS ONSHORE LP

Address: P O BOX 173779

City: DENVER State: CO Zip: 80217-3779

Contact Information

Name: Rachel Friedman

Phone: (720) 9296564

Fax: ()

email: rachel_friedman@oxy.com

FINANCIAL ASSURANCE FOR THIS LOCATION (check all that apply)

- ☒ Plugging, Abandonment, and Reclamation 20010124
- ☐ Centralized E&P Waste Management Facility _____
- ☐ Gas Gathering, Gas Processing, and Underground Gas Storage Facilities _____
- ☐ Surface Owner Protection Bond. _____

Federal Financial Assurance

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

Amount of Federal Financial Assurance \$ _____

LOCATION IDENTIFICATION

Name: LABRISA

Number: 11-35HZ

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.

Quarter: NESW Section: 35 Township: 2N Range: 65W Meridian: 6 Ground Elevation: 4974
Latitude: 40.091305 Longitude: -104.633446
GPS Quality Value: 1.2 Type of GPS Quality Value: PDOP Date of Measurement: 07/25/2022

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: WELD 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. Yes

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: 10/11/2022

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

Status/disposition date: 02/02/2023

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: Jason Maxey Contact Phone: 970-470-3580

Contact Email: jmaxey@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

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

Type of Proximate Govt	County	Municipality	Contact Name	Contact Phone	Contact Email
Municipality		Hudson	Jennifer Woods	303.536.9311	jwoods@hudsoncolorado.org

FEDERAL PERMIT INFORMATION

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

Date submitted: _____

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

Status/disposition Date: _____

If Federal agency permit has been approved or denied, attach the final decision document(s).

Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: _____ Contact Phone: _____

Contact Email: _____ Field Office: _____

Additional explanation of local and/or federal process:

1041WOGLA22-0036 was approved on 2/2/23

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: 06/15/2022

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

Date of federal consultation: _____

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

ALA APPLICABILITY AND CRITERIA

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

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

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

- | | |
|---|--|
| <input type="checkbox"/> i. WPS < 2,000 feet from RBU/HOBU | <input type="checkbox"/> vi.aa. WPS within a surface water supply area |
| <input type="checkbox"/> ii. WPS < 2,000 feet from School/Child Care Center | <input type="checkbox"/> vi.bb. WPS < 2,640 feet from Type III or GUDI well |
| <input type="checkbox"/> iii. WPS < 1,500 feet from DOAA | <input type="checkbox"/> vii. WPS within/immediately upgradient of wetland/riparian corridor |
| <input type="checkbox"/> iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA | <input type="checkbox"/> viii. WPS within HPH and CPW did not waive |
| <input type="checkbox"/> v. WPS within a Floodplain | <input type="checkbox"/> ix. Operator using Surface bond |
| | <input type="checkbox"/> 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: SPARBOE FARMS INC Phone: 612-910-1416
 Address: P.O. BOX 309 Fax: _____
 Address: _____ Email: ROSS.ELENKIWICH@SPARBOE.COM
 City: LITCHFIELD State: MN Zip: 55355-0309

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: No

Lease description if necessary: _____

SITE EQUIPMENT LIST

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

Wells <u>10</u>	Oil Tanks <u>0</u>	Condensate Tanks <u>1</u>	Water Tanks <u>4</u>	Buried Produced Water Vaults <u>0</u>
Drilling Pits <u>0</u>	Production Pits <u>0</u>	Special Purpose Pits <u>0</u>	Multi-Well Pits <u>0</u>	Modular Large Volume Tank <u>0</u>
Pump Jacks <u>10</u>	Separators <u>4</u>	Injection Pumps <u>0</u>	Heater-Treaters <u>0</u>	Gas Compressors <u>0</u>
Gas or Diesel Motors <u>0</u>	Electric Motors <u>0</u>	Electric Generators <u>0</u>	Fuel Tanks <u>0</u>	LACT Unit <u>2</u>
Dehydrator Units <u>0</u>	Vapor Recovery Unit <u>0</u>	VOC Combustor <u>1</u>	Flare <u>0</u>	Enclosed Combustion Devices <u>0</u>
Meter/Sales Building <u>1</u>	Pigging Station <u>0</u>	Vapor Recovery Towers <u>0</u>		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
FG Scrubber	1
Air Compressor	1
Electrical Box	2
Chemical Tote	3
E-House	1
Communication Tower	1

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Water Tanks	20
Enclosed Combustion Devices	5
Electric Generators	1
Purge Flare	3
Propane Tank	1
Fuel Tanks - Propane	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.

Flowlines - 2"-3" size (outside diameter), constructed of carbon steel.

Oil and gas pipelines will be used at this location. Water for completions operations will be brought to the location through temporary water lines using KMOG's Water on Demand system. The oil and gas pipelines will be constructed by a 3rd party midstream company.

CULTURAL DISTANCE AND DIRECTION

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

				Rule 604.b Conditions Satisfied (check all that apply):			Details of Condition(s)	604.b. (4)
	Distance		Direction	604.b. (1)	604.b. (2)	604.b. (3)		
Building:	675 Feet		E					
Residential Building Unit (RBU):	2350 Feet		E	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
High Occupancy Building Unit(HOBU)	5280 Feet		N	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Designated Outside Activity Area:	5280 Feet		W					
Public Road:	1832 Feet		SE					
Above Ground Utility:	1311 Feet		SE					
Railroad:	2351 Feet		SE					
Property Line:	36 Feet		E					
School Facility:	5280 Feet		S					
Child Care Center:	5280 Feet		SW					
Disproportionately Impacted (DI) Community:	5280 Feet		W					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet		W	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>

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	1
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: 13.45

Size of location after interim reclamation in acres: 3.47

Estimated post-construction ground elevation: 4967

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? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE

Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

PLEASE SEE ATTACHED WASTE MANAGEMENT PLAN

Beneficial reuse or land application plan submitted? Yes

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable: 456644

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:

Rangeland 90% & Impervious surfaces 10%

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

Agricultural

Describe any applicable Federal land use designation:

N/A

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):

Rangeland 90% & Impervious surfaces 10%

Reference Area Latitude: 40.093390

Reference Area Latitude: -104.634260

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

Plant Community	Dominant vegetation
Disturbed Grassland	unidentified bunchgrasses
Disturbed Grassland	Russian thistle (Salsola kali)
Disturbed Grassland	Basin wild rye (Leymus cinereus)
Disturbed Grassland	cheatgrass (Bromus tectorum)
Disturbed Grassland	Common sunflower (Helianthus annuus)
Disturbed Grassland	Kochia (Kochia scoparius)

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: 49-Osgood sand, 0 to 3 percent slopes

NRCS Map Unit Name: 70-Valent sand, 3 to 9 percent slopes

NRCS Map Unit Name: 69-Valent sand, 0 to 3 percent slopes

GROUNDWATER AND WATER WELL INFORMATION

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

water well: 497 Feet N

Spring or Seep: 5280 Feet W

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 20 Feet

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

Existing well permit number 23672-F-R, 963' S, Depth 60', SWL 10', Elevation 4964
Elevation of Labrisa Location: 4972
(4974 - 4964) + 10 = 20 feet

SURFACE WATER AND WETLANDS

703 Feet NE

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

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: 703 Feet NE

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

Freshwater Pond

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: External

Public Water System Administrator - Contact Name Jennifer Woods Email jwoods@hudsoncolorado.org

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:

KMOG recognizes that the Labrisa 11-35HZ Location is within the Generalized External Buffer of a Rule 411.b well, however the well location has been confirmed with the Town of Hudson and is greater than 2,640 feet away from the WPS of the location.

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

☒ Federal (FEMA) ☐ State ☒ 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? Yes

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: _____

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 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

PLANS

Total Plans
Uploaded: 15

- ☐ (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
- ☒ (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- ☒ (6) Transportation Plan
- ☒ (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- ☒ (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
- ☒ (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
- ☒ (13) Fluid Leak Detection Plan
- ☒ (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- ☒ (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- ☒ (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- ☒ (17) Wildlife Plan consistent with the requirements of Rule 1201
- ☒ (18) Water Plan
- ☒ (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.

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

OPERATOR COMMENTS AND SUBMITTAL

Comments

This location is not proposed within 2,000 feet of a Residential Building Unit, High Occupancy Building Unit, or School Facility located within a Disproportionately Impacted Community, a Rule 304.c.(20) Community Outreach Plan is not required. KMOG's "Community Consultation Plan" attached as "Other" is intended to provide supplemental information regarding efforts on community outreach and communication.

KMOG recognizes that the Labrisa 11-35HZ Location is within the Generalized External Buffer of a Rule 411.b well, however the well location has been confirmed with the Town of Hudson and is greater than 2,640 feet away from the WPS of the location.

The attached EAP will be submitted to the Hudson Fire Protection District. Once the plan is approved a signed copy will be sent to the COGCC OGLA staff.

KMOG's general Air Monitoring Plan has been approved by the CDPHE and is attached to the 2B. A site-specific Air Monitoring Plan for this location will be submitted to the COGCC and CDPHE for approval of air monitor locations prior to operations.

Flowlines: Flow lines will flow to the production facility location. During production, flow direction in the flow lines is from the wellhead to the production facility. The size of flow lines is typically 2". Flow lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility.

Gas custody transfer will occur at the custody transfer meter located on the proposed production facility location. Oil custody transfer will occur at the LACT Unit located on the proposed production facility location.

Gas lift lines are also occasionally installed (one per well) from the well head to the production facility. During operation flow direction in the gas lift lines will be from the production facility to the well head. The size of the gas lift lines is typically 2". Gas lift lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the tank battery.

Air Supply Lines: Compressed air supply lines will also be installed from the well head to the production facility. During operation flow direction in the supply lines will be from the production facility to the well head. The size of the supply lines is typically 1". Supply lines will be constructed from steel pipe, buried, and will equal the distance between the well heads and the production facility.

26 temporary 500 barrel skid-mounted frac tanks will be utilized during flowback and initially for produced water. It is estimated 5 temporary ECDs and the temporary tanks will be on location for 9 - 12 months and will be removed as water production declines. A temporary generator may be placed on location if needed and would be in place until electric power is available. Temporary purge flares may be placed on location for up to 60 days. A temporary 500-gallon propane tank will be used on location to provide fuel gas during facility equipment startup.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: 09/30/2022 Email: djregulatory@oxy.com

Print Name: Rachel Friedman Title: Geological Advisor

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.

COA Type

Description

0 COA	

Best Management Practices

No BMP/COA Type

Description

1	General Housekeeping	All loadlines shall be bullplugged or capped.
2	Wildlife	An environmental assessment will be conducted immediately prior to pad construction, drilling, and completion operations.
3	Storm Water/Erosion Control	KMOG will properly test for and dispose of TENORM

4	Material Handling and Spill Prevention	All storage tanks used for active production rig drilling operations, used in lieu of pits, will contain pit level monitors with Electronic Drilling Recorders (EDR). KMG uses EDRs with pit level monitor(s) and alarm(s) for production rigs. Basic level gauges will be used on tanks associated with the surface rig.
5	Material Handling and Spill Prevention	KMOG will refuel vehicles only on impervious surfaces and never during storm events.
6	Material Handling and Spill Prevention	KMOG will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections
7	Material Handling and Spill Prevention	KMOG will not use PFAS on location
8	Construction	KMOG will extend an existing access road off of N. Oak St to access the location for drilling, completions, and production operations, including maintenance of equipment. The road will be properly constructed and maintained to accommodate for emergency vehicle access.
9	Construction	The completed wellsite will be surrounded with a fence and gate with adequate lock to restrict access to authorized personnel only. KMOG personnel will monitor the wellsite upon completion of the wells. Authorized representatives and/or KMOG personnel shall be on-site during drilling and completions operations.
10	Construction	KMOG will only construct during day light and there will be no nighttime operations that require lighting.
11	Emissions mitigation	Temporary ECD(s) will be utilized to mitigate releases of emissions from temporary produced water storage tanks for the duration which the tanks are on location and being used.
12	Emissions mitigation	KMOG commits to monitoring ambient air quality during drilling and completion operations and for the first 6 months of production in accordance with Reg. 7
13	Emissions mitigation	KMOG will properly maintain vehicles and equipment
14	Emissions mitigation	KMOG will use non-emitting pneumatic controllers
15	Emissions mitigation	KMOG will use a natural gas drilling rig
16	Emissions mitigation	KMOG will not utilize tanks for oil storage, other than maintenance tanks. KMOG will have adequate and committed pipeline take away capacity for all produced gas and oil. Produced water will be trucked off location.
17	Emissions mitigation	KMOG 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
18	Emissions mitigation	KMOG will control emergency flaring with an enclosed combustor with a destruction efficiency of 98% or better
19	Emissions mitigation	KMOG will control bradenhead/casinghead venting
20	Emissions mitigation	KMOG will use tier IV or better engines for hydraulic fracturing
21	Emissions mitigation	KMOG will use lease automated custody transfer (LACT) system to remove/reduce the need for truck loadout
22	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will eliminate use of VOC paints and solvents
23	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will minimize vehicle and engine idling

24	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will reduce truck traffic and worker traffic
25	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will postpone the refueling of vehicles as feasible given the number of ozone action days, the operations ongoing at the time, and safety considerations
26	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will suspend or delay the use of fossil fuel powered ancillary equipment as feasible given the number of ozone action days, the operations ongoing at the time, and safety considerations
27	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will postpone construction activities as feasible given the number of ozone action days, the operations ongoing at the time, and safety considerations
28	Emissions mitigation	Ozone mitigation on forecasted high ozone days: KMOG will reschedule non-essential operational activities such as pigging, well unloading and tank cleaning as feasible given the number of ozone action days, the operations ongoing at the time, and safety considerations
29	Emissions mitigation	KMOG commits to plugging and abandoning the wells listed in the Ecosystem and Wildlife Resources section of the Labrisa Cumulative Impacts Plan within one year of all wells associated with this OGD (Labrisa 11-35HZ) being fully turned over to production through permanent facility equipment. If unanticipated delays are encountered associated with safety concerns, wildlife stipulations, landowner considerations, offset operations, or rig availability, KMOG will provide staff with an updated schedule for plugging and abandonment via a Form 4.
30	Odor mitigation	KMOG will cover trucks transporting drill cuttings
31	Drilling/Completion Operations	Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, KMOG shall not produce the wells without an approved variance.
32	Drilling/Completion Operations	Guy line anchors will not be used. Base Beams will be used to stabilize the rig and removed after drilling.
33	Interim Reclamation	The wellsite will be cleared of all non-essential equipment within ninety (90) days after all wells associated with the pad have been plugged and abandoned.
34	Final Reclamation	Once the wells have been plugged and abandoned, KMOG will identify the location of the wellbores with permanent monuments that will detail the well names and date of plugging.

Total: 34 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403173220	SURFACE AGRMT/SURETY
403179708	LOCATION PICTURES
403179710	LOCATION PICTURES
403179711	LOCATION DRAWING
403179717	PRELIMINARY PROCESS FLOW DIAGRAMS
403179725	ACCESS ROAD MAP
403179727	RELATED LOCATION AND FLOWLINE MAP
403179735	DIRECTIONAL WELL PLAT
403179741	OIL AND GAS LOCATION GIS SHP
403179743	OTHER
403179747	LGD CONSULTATION
403179752	GEOLOGIC HAZARD MAP
403181919	HYDROLOGY MAP
403463399	LOCAL/FED FINAL PERMIT DECISION
403463410	NRCS MAP UNIT DESC
403466076	WILDLIFE HABITAT DRAWING
403468365	REFERENCE AREA MAP
403468366	REFERENCE AREA PICTURES
403469099	CULTURAL FEATURES MAP
403469100	LAYOUT DRAWING

Total Attach: 20 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Returned to DRAFT for the following reasons: Attachment issues. Data field issues.	07/12/2023

Total: 1 comment(s)

Public Comments

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

