
EMERGENCY RESPONSE PLAN



1 Wavetech Harker-Family 31-22

Sec. 22 T12S R43W (NW/4 NE/4)

1 Wavetech Hillman Family Trust 43-15

Sec. 15 T12S R43W (NE/4 SE/4)

Cheyenne County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application
and consistent with the requirements of Rule 602.j.

December 23, 2022

Revised: September 13, 2023

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INTRODUCTION

Wavetech's Emergency Response Plan was sent via email on May 23, 2023 to the Cheyenne County Office of Emergency Management (OEM) who will determine the responding fire districts.

SECTION 2 - SITE SPECIFIC INFORMATION

a. **Site Safety Requirements and General Information**

The minimum personal protective equipment (PPE) to enter any Wavetech location includes hard hat, safety glasses, safety toe boots, and fire-resistant clothing (FRC). All contractors and visitors are responsible for providing their personnel/employees/persons with the appropriate training on and use of PPE while on all Wavetech locations and signage will be in place to disclose this information at the entrance to location. In addition, all personnel entering a Wavetech location must understand and abide by Wavetech's contractor expectations relating to environmental, health, and safety requirements.

The primary hazards that any person must be aware of while on a Wavetech location include, but are not limited to, the potential for release of gases and/or liquids from production equipment/tanks, heavy truck and equipment traffic, loud noise, high pressures, and the potential for a flash fire. These hazards can vary depending on the work being performed.

The following emergency response equipment will be onsite in the event of a small scale spill or accident:

- pig blankets,
- snakes,
- absorbent materials,
- fire extinguisher

In the event of a larger incident, the operator will contract a third-party provider to respond to an unintentional release or soil contamination.

b. **Emergency Muster/ Assembly Points/ Ingress and Egress**

Muster Point: The Operator will designate primary and secondary muster areas at the Location. In the event of an evacuation, all personnel on-site will immediately evacuate and move to the primary muster area. If the primary muster area is unsafe, personnel will move to the secondary muster area. During evacuations, personnel will avoid taking shortcuts that create exposure to hazards.

Ingress and Egress: Employees and contractors must maintain locations so that routes of egress from building, discharge areas, access roads and other means of emergency egress and access are properly maintained.

c. **911 Address and GPS Coordinates**

1 Wavetech Harker-Family 31-22

Legal Description – NWNE Section 22 T12S R43W

Directions: Begin at the intersection of U.S Highway 385 and County Road DD. Travel east on County Road DD for approximately 3.8 mile to the proposed access road. Turn right and travel south for 532' (0.1 miles) to the location.

Lat/Long: Lat: 38.99909° N Long: -102.212294° W

1 Wavetech Hillman Family Trust 43-15

Legal Description – NESE Section 15 T12S R43W

Directions: Begin at the intersection of U.S. Highway 385 and County Road DD. Travel easterly on County Road DD for approximately 4.2 miles to the proposed access road. Turn left and travel north for 720' (0.3 miles) to the location.

Lat/Long: Lat: 39.006288° N Long: -102.207392° W

d. Site Description

The Locations are in rural Cheyenne County, Colorado. The surrounding land uses are rangeland and agriculture. There are no Residential Building Units within 2,000' of the Locations. Both the 1 Wavetech Harker-Family 31-22 and 1 Wavetech Hillman Family Trust 43-15 Locations are accessed from U.S. Highway 385 and County Road DD.

Each Location will have the following equipment:

- 1 vertical well
- 1 water tank (300 bbls)
- 1 oil tanks (300 bbls).
- 1 separator
- 1 gas meter
- Gathering pipelines to helium processing facility are onsite. 2" and/or 3" schedule 40 steel flowlines carrying oil, gas and water from wellheads to production equipment and sales.

e. Nearby School and High Occupancy Building Units

There are no schools, High Occupancy Building Units or Residential Building Units within 2,000' of the Locations. Please see Location Drawings in for the 1 Wavetech Harker-Family 31-22 and 1 Wavetech Hillman Family Trust 43-15.

f. Nearby Sensitive Areas

The locations are all within Lesser Prairie Chicken estimated occupied range. There are no other sensitive areas within the development area such as water features or wetlands. Any impacts to nearby waters of the US or wetlands will be mitigated by Best Management Practices that can be found in the Stormwater Management Plan and Dust Mitigation Plan.

g. Location of SDS sheets, Sign-In Sheets, JSAs and Safety Forms

Depending on the operations taking place on location, the chemicals that may be present will vary. Regardless, hazard communication is a critical safety measure and Safety Data Sheets (SDS) will be available from the Company Representative present or the contractor performing work on location.

During drilling, completion, and testing operations all employees and approved visitors to the 1 Wavetech Harker-Family 31-22 and 1 Wavetech Hillman Family Trust 43-15 will be required to check in at the company man trailer where they will be required to sign in and will be provided with a detailed safety briefing of current operations and all safety precautions that must be adhered to while on location. In addition, all who enter the location must also sign out upon their departure. Site Supervisor are required to account for all persons entering or leaving location during active operations and in the event of an incident.

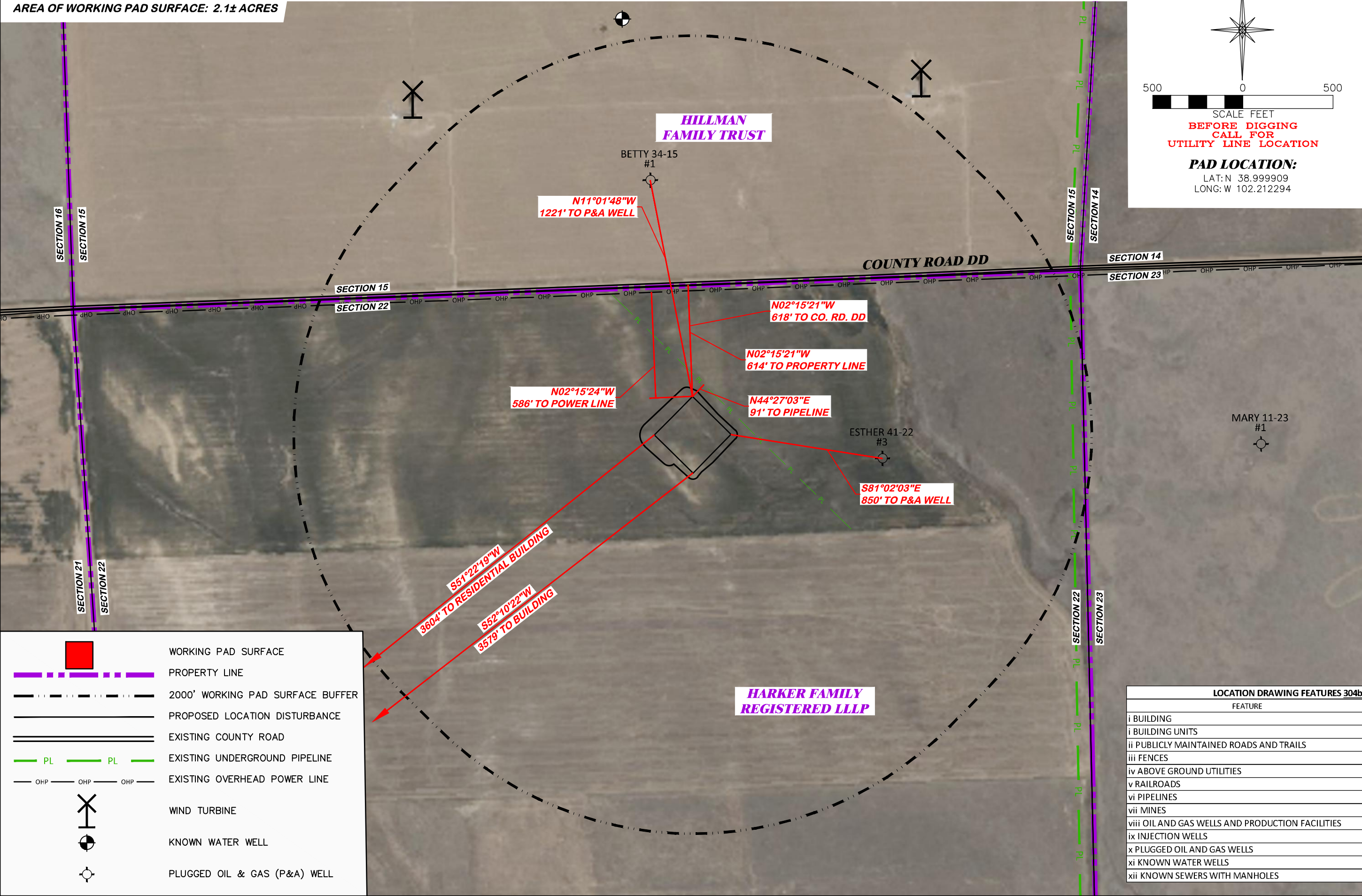
Once drilling, completion, and facility installation activities are finalized, the site will transition to its production phase. No unauthorized personnel will be allowed on location without first contacting a company representative.

SECTION 3 – MAPS AND DIAGRAMS

- a. Location Drawing**
- b. Access Maps**
- c. Facility Layout Diagrams**
- d. Rig Layout Diagrams**

UNGRADED ELEVATION: 4119.5'
FINAL ELEVATION: 4118.9'
AREA OF DISTURBANCE: 3.7± ACRES
AREA OF WORKING PAD SURFACE: 2.1± ACRES

#1 WAVETECH HARKER-FAMILY 31-22



N

5000500

SCALE FEET

BEFORE DIGGING
CALL FOR
UTILITY LINE LOCATION

PAD LOCATION:
LAT: N 38.999909
LONG: W 102.212294

LOCATION DRAWING

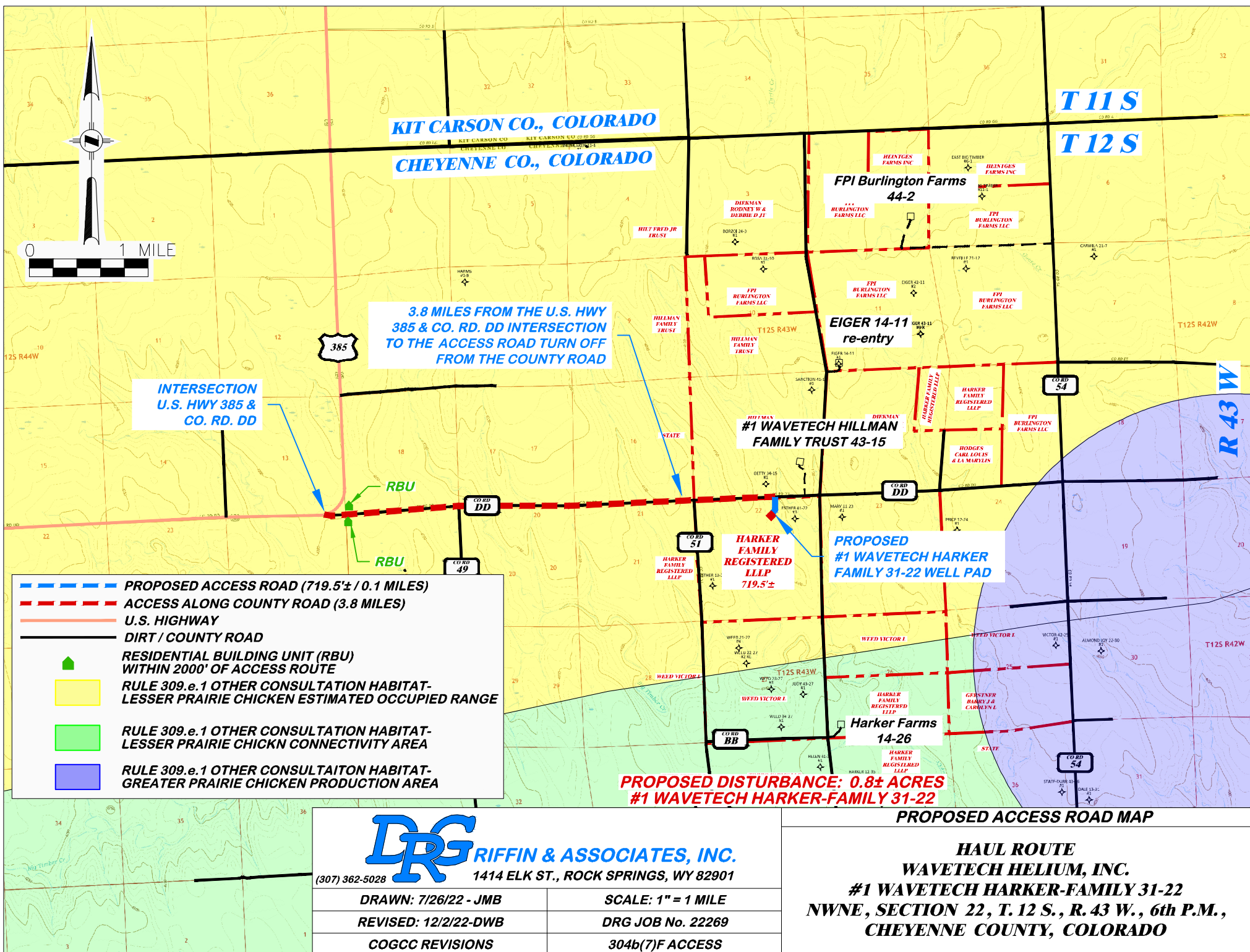
WAVETECH HELIUM, INC.
#1 WAVETECH HARKER-FAMILY 31-22
NWNE, SECTION 22, T. 12 S., R. 43 W., 6th P.M.,
CHEYENNE COUNTY, COLORADO

(307) 862-5028

RIFFIN & ASSOCIATES, INC.
1414 ELK ST., ROCK SPRINGS, WY 82901

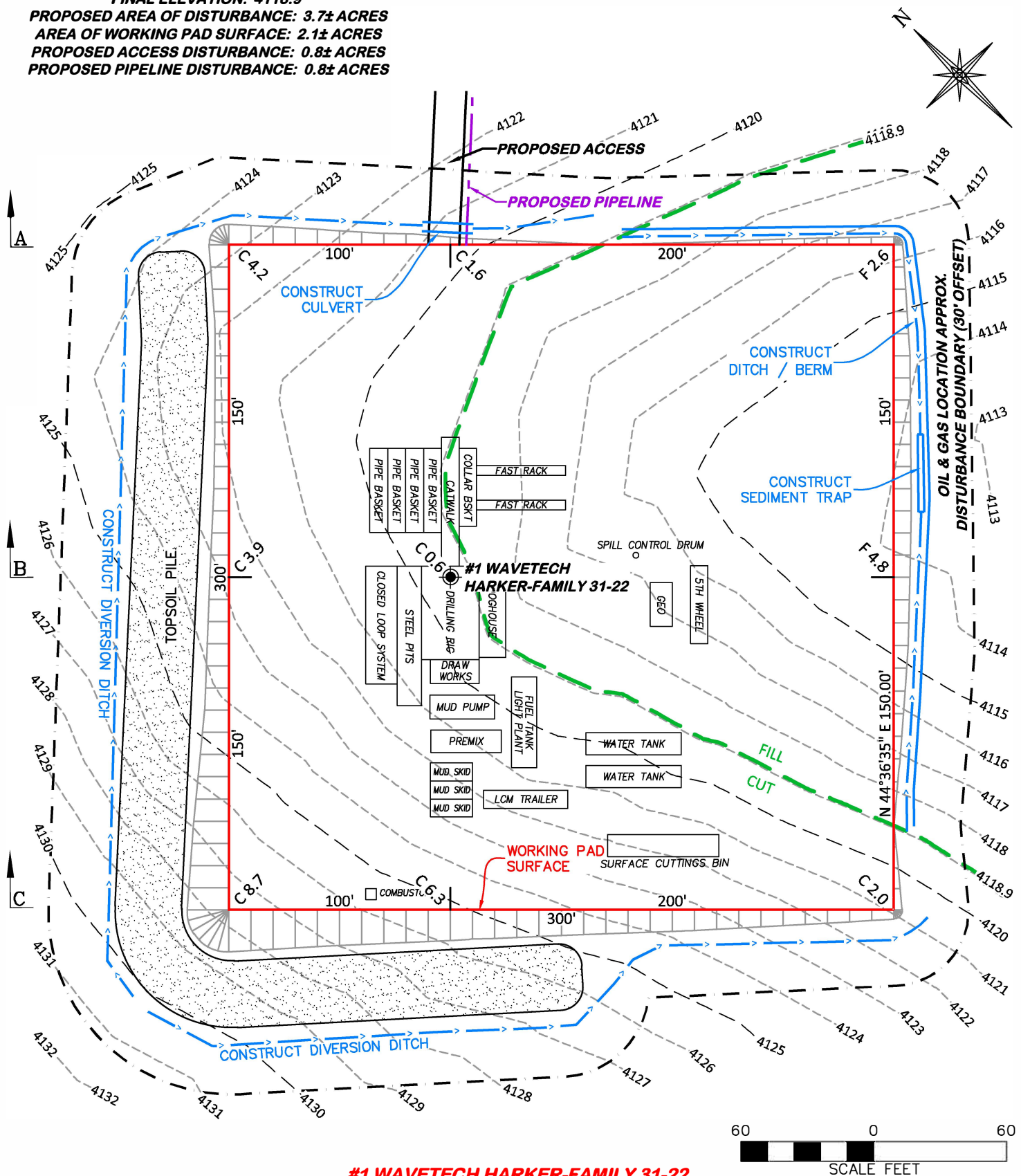
DRAWN: 7/26/22 - JMB	SCALE: 1" = 500'
REVISED: 12/2/22-DWB	DRG JOB No. 22269
COGCC REVISIONS	304b(7)A LOC AERIAL

LOCATION DRAWING FEATURES 304b(7)A	
FEATURE	DISTANCE
i BUILDING	3579' SW
i BUILDING UNITS	3604' SW
ii PUBLICLY MAINTAINED ROADS AND TRAILS	618' N
iii FENCES	5280'
iv ABOVE GROUND UTILITIES	586' N
v RAILROADS	5280'
vi PIPELINES	91' NE
vii MINES	5280'
viii OIL AND GAS WELLS AND PRODUCTION FACILITIES	2836' S
ix INJECTION WELLS	5280'
x PLUGGED OIL AND GAS WELLS	850' E
xi KNOWN WATER WELLS	2128' N
xii KNOWN SEWERS WITH MANHOLES	5280'



FINAL ELEVATION: 4118.9'

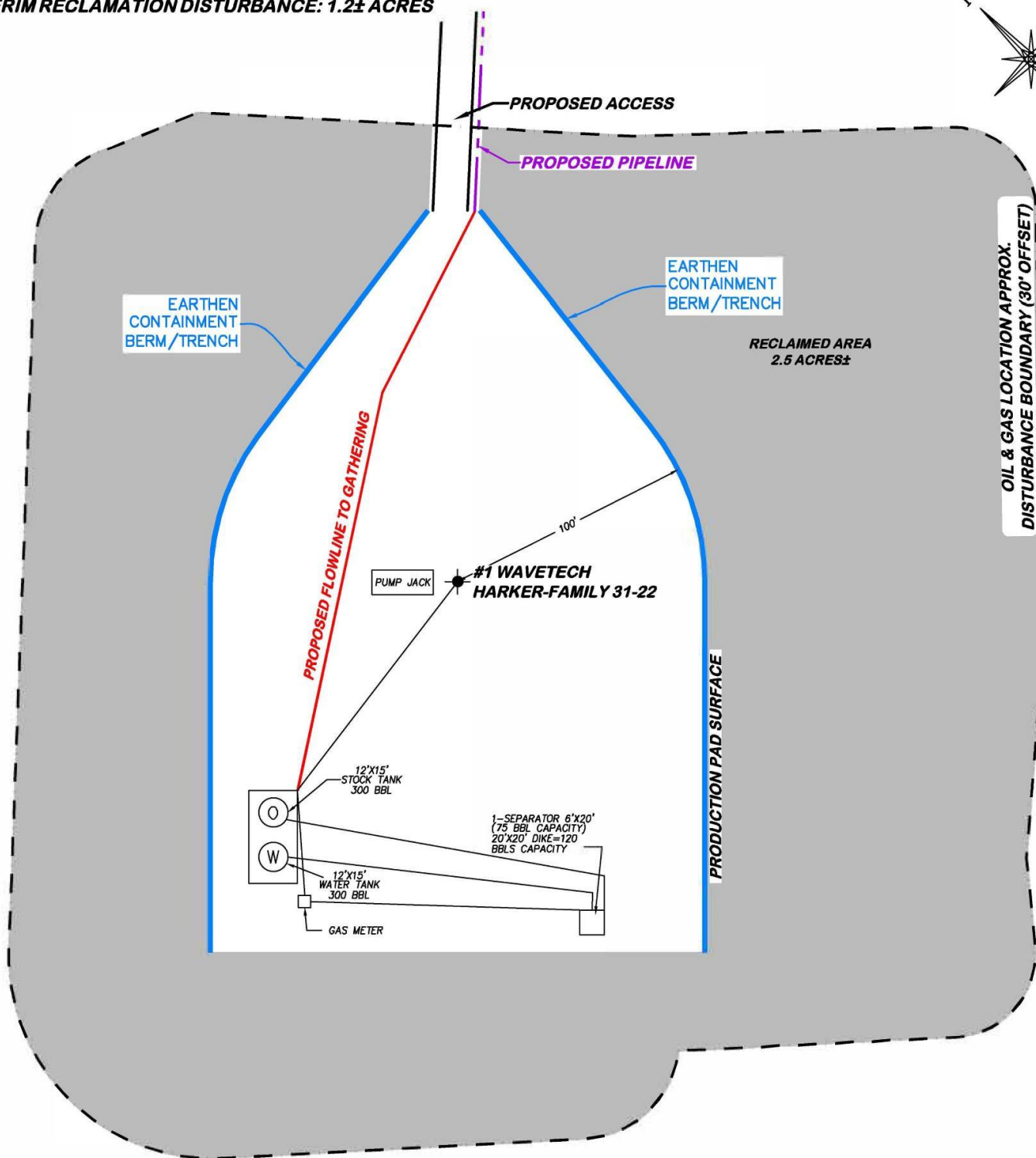
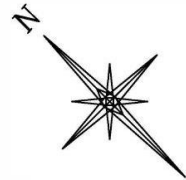
PROPOSED PIPELINE DISTURBANCE: 0.8± ACRES



SCALE FEET

#1 WAVETECH HARKER-FAMILY 31-22
NWNE, SECTION 22, T. 12 S., R. 43 W., 6th P.M.,
CHEYENNE COUNTY, COLORADO

APPROXIMATE DISTURBANCE AREA 3.7± ACRES
 PROPOSED RECLAMATION AREA: 2.5± ACRES
 INTERIM RECLAMATION DISTURBANCE: 1.2± ACRES



#1 WAVETECH HARKER-FAMILY 31-22

DRG RIFFIN & ASSOCIATES, INC. (307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901	
DRAWN: 7/26/22 - JMB	SCALE: 1" = 60'
REVISED: NA	DRG JOB No. 22269
	304b(7)Bv FACILITY

CONSTRUCTION LAYOUT DRAWING 5 OF 5
FACILITY LAYOUT DRAWING WAVETECH HELIUM, INC. #1 WAVETECH HARKER-FAMILY 31-22 NWNE, SECTION 22, T. 12 S., R. 43 W., 6th P.M., CHEYENNE COUNTY, COLORADO

UNGRADED ELEVATION: 4128.2'
FINAL ELEVATION: 4127.3'
AREA OF DISTURBANCE: 3.5± ACRES
AREA OF WORKING PAD SURFACE: 2.1± ACRES

#1 WAVETECH HILLMAN FAMILY TRUST 43-15

N

500

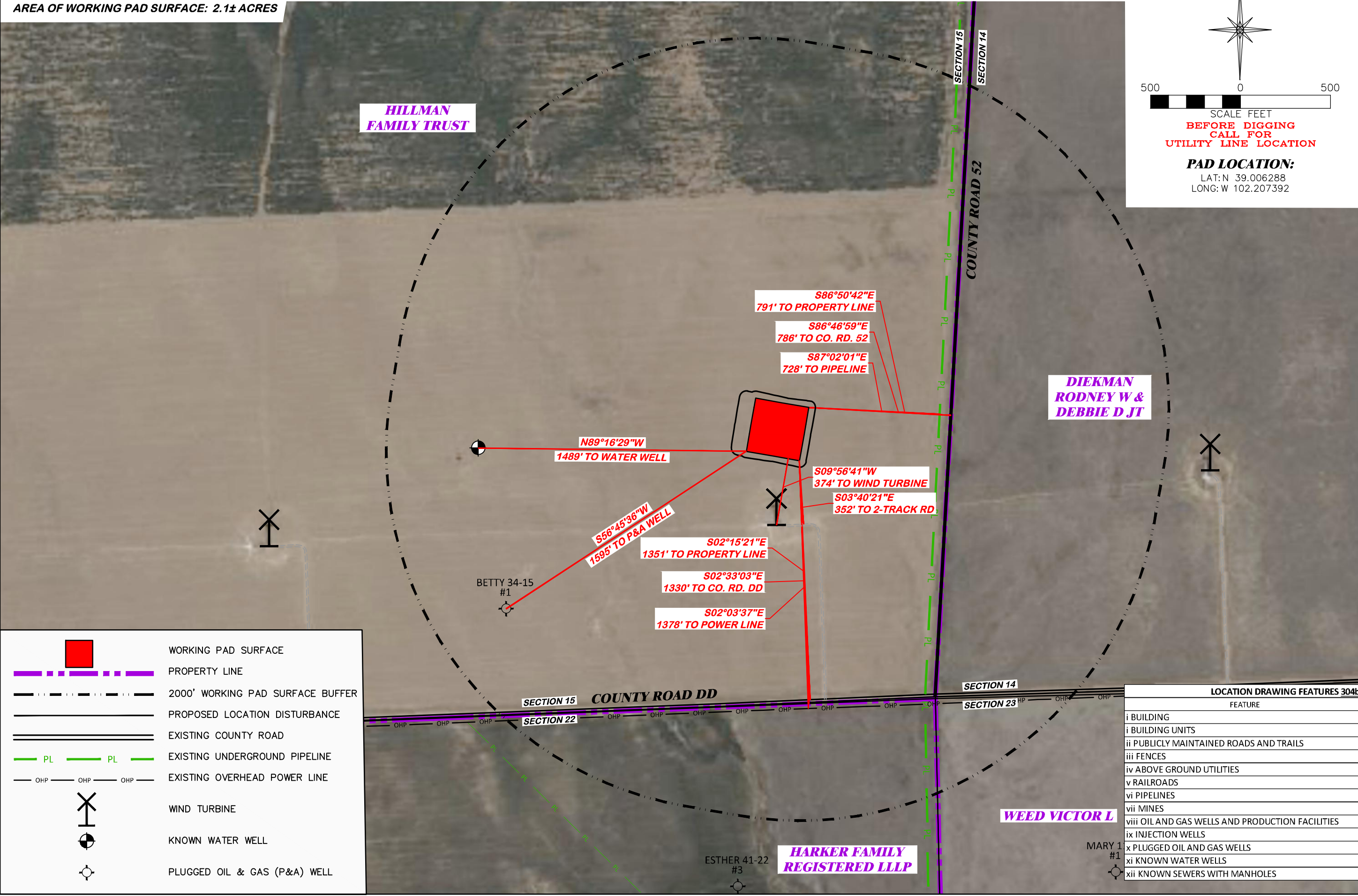
0

500

SCALE FEET

BEFORE DIGGING
CALL FOR
UTILITY LINE LOCATION

PAD LOCATION:
LAT: N 39.006288
LONG: W 102.207392



WORKING PAD SURFACE

PROPERTY LINE

2000' WORKING PAD SURFACE BUFFER

PROPOSED LOCATION DISTURBANCE

EXISTING COUNTY ROAD

PL

PL

PL

EXISTING UNDERGROUND PIPELINE

OHP

OHP

OHP

EXISTING OVERHEAD POWER LINE

X

WIND TURBINE

KNOWN WATER WELL

PLUGGED OIL & GAS (P&A) WELL

LOCATION DRAWING FEATURES 304b(7)A	
FEATURE	DISTANCE
i BUILDING	5280'
i BUILDING UNITS	5280'
ii PUBLICLY MAINTAINED ROADS AND TRAILS	AS SHOWN
iii FENCES	5280'
iv ABOVE GROUND UTILITIES	AS SHOWN
v RAILROADS	5280'
vi PIPELINES	728' E
vii MINES	5280'
viii OIL AND GAS WELLS AND PRODUCTION FACILITIES	5280'
ix INJECTION WELLS	5280'
x PLUGGED OIL AND GAS WELLS	1595' SW
xi KNOWN WATER WELLS	1489' W
xii KNOWN SEWERS WITH MANHOLES	5280'

DRG

RIFFIN & ASSOCIATES, INC.

(307) 962-5028

1414 ELK ST., ROCK SPRINGS, WY 82901

DRAWN: 8/18/22 - JMB

REVISED: 11/28/22-DWB

WELL NAME CHANGE

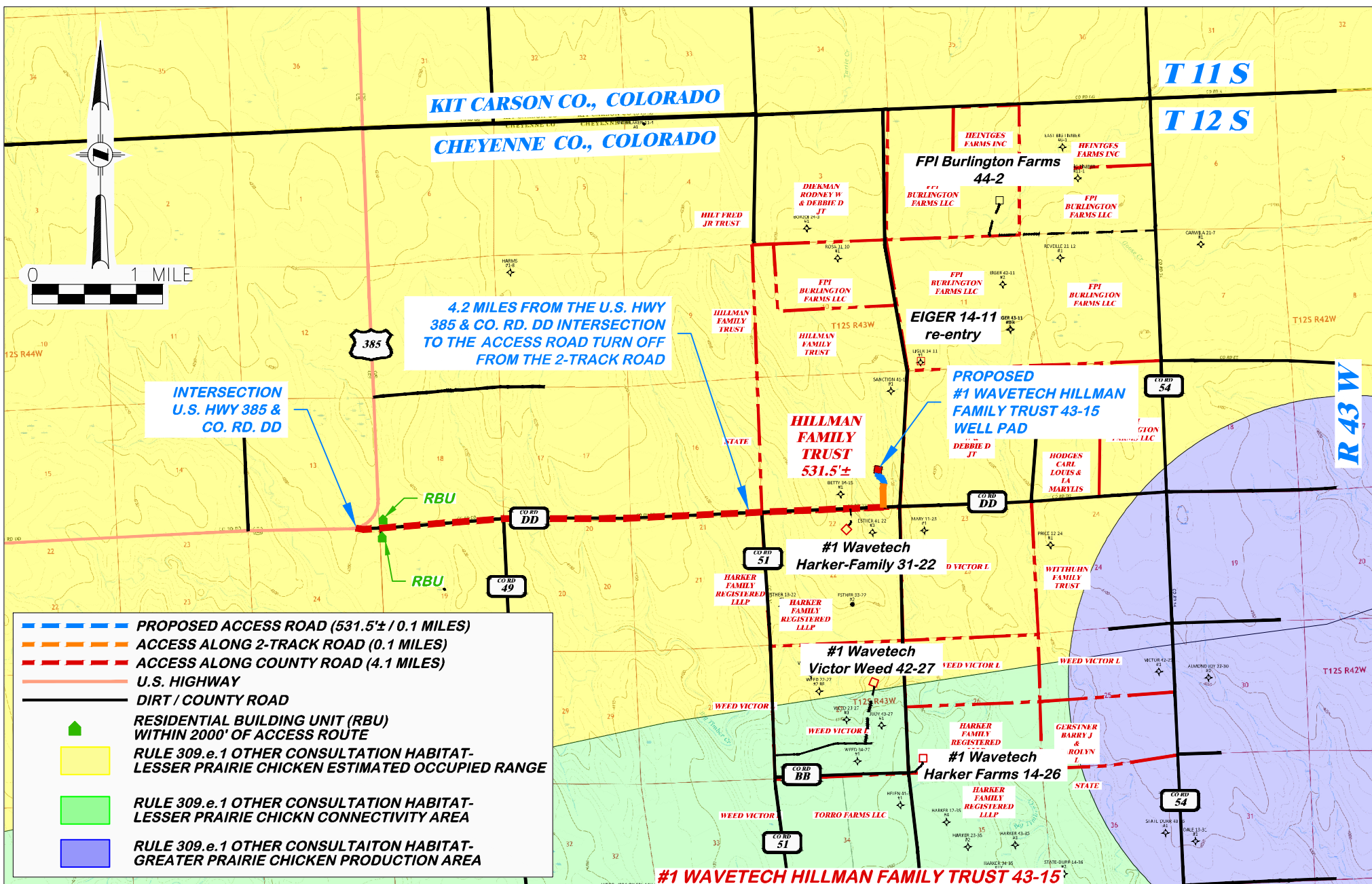
SCALE: 1" = 500'

DRG JOB No. 22263

304b(7)A LOC AERIAL

LOCATION DRAWING

WAVETECH HELIUM, INC.
#1 WAVETECH HILLMAN FAMILY TRUST 43-15
NESE, SECTION 15, T. 12 S., R. 43 W., 6th P.M.,
CHEYENNE COUNTY, COLORADO



DRG RIFFIN & ASSOCIATES, INC.
1414 ELK ST., ROCK SPRINGS, WY 82901

(307) 362-5028

DRAWN: 8/18/22 - JMB

REVISED: 11/28/22-DWB

WELL NAME CHANGE

SCALE: 1" = 1 MILE

DRG JOB No. 22263

304b(7)F ACCESS

PROPOSED ACCESS ROAD MAP

HAUL ROUTE
WAVETECH HELIUM, INC.
#1 WAVETECH HILLMAN FAMILY TRUST 43-15
NESE, SECTION 15, T. 12 S., R. 43 W., 6th P.M.,
CHEYENNE COUNTY, COLORADO

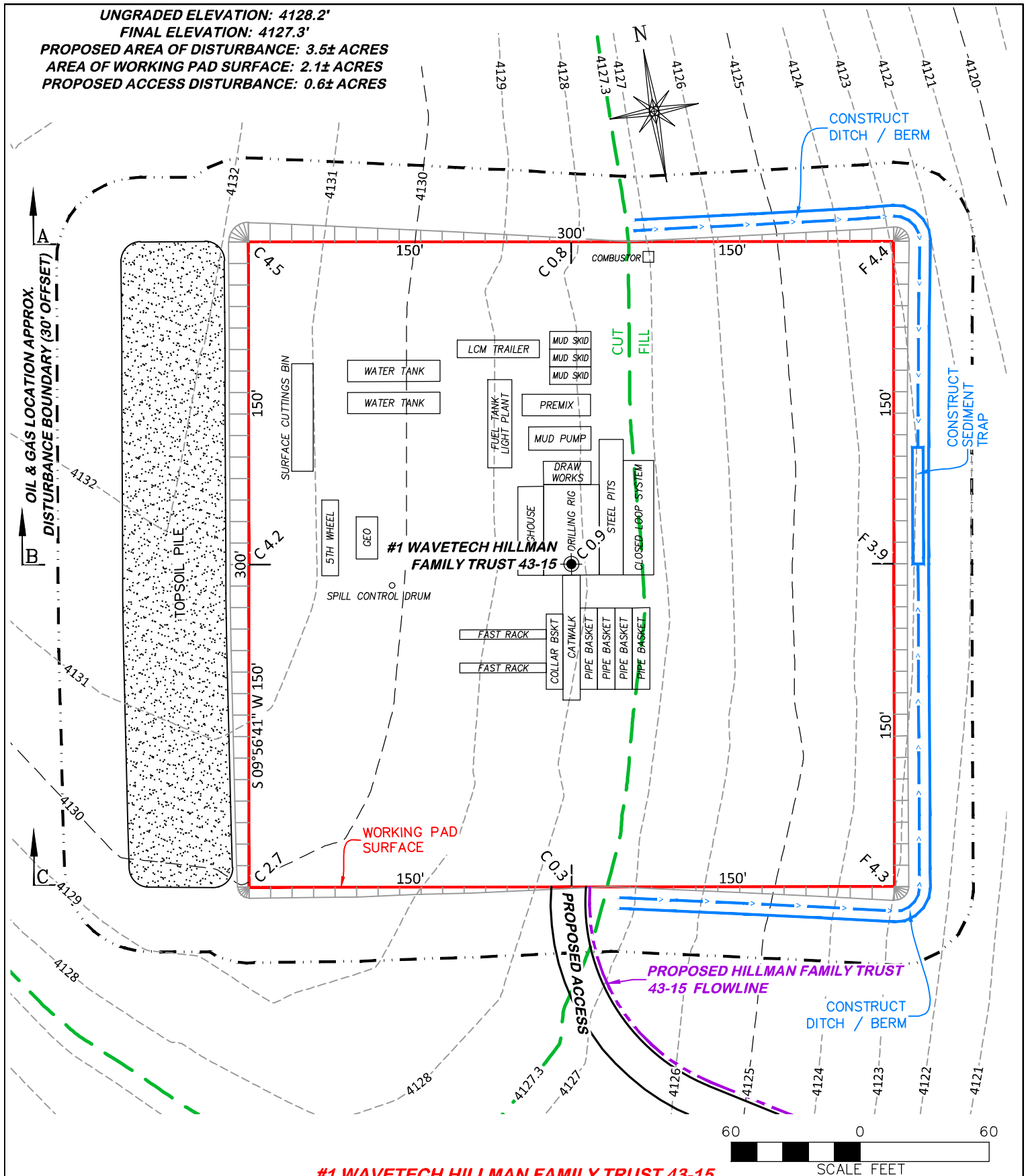
UNGRADED ELEVATION: 4128.2'

FINAL ELEVATION: 4127.3'

PROPOSED AREA OF DISTURBANCE: 3.5± ACRES

AREA OF WORKING PAD SURFACE: 2.1± ACRES

PROPOSED ACCESS DISTURBANCE: 0.6± ACRES



DRG RIFFIN & ASSOCIATES, INC.

(307) 362-5028

1414 ELK ST., ROCK SPRINGS, WY 82901

DRAWN: 8/18/22 - JMB

SCALE: 1" = 60'

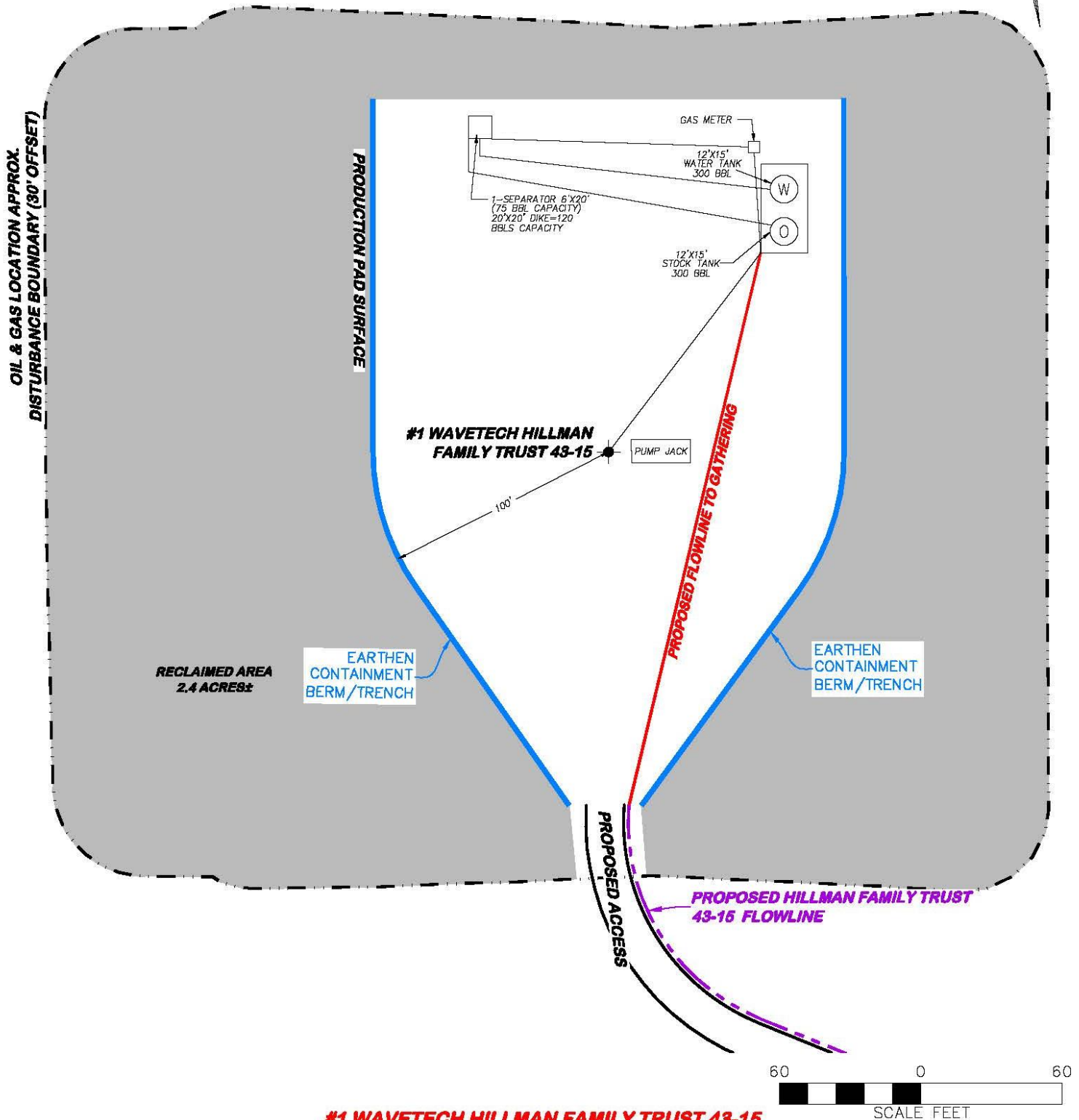
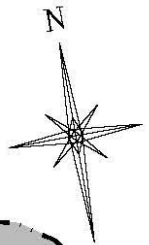
REVISED: 11/28/22-DWB

DRG JOB No. 22263

MISC. REVISIONS

304b(7)Bii RIG

APPROXIMATE DISTURBANCE AREA 3.5± ACRES
PROPOSED RECLAMATION AREA: 2.4± ACRES
INTERIM RECLAMATION DISTURBANCE: 1.1± ACRES



#1 WAVETECH HILLMAN FAMILY TRUST 43-15

SCALE FEET



RIFFIN & ASSOCIATES, INC.
 1414 ELK ST., ROCK SPRINGS, WY 82901

(307) 362-5028

DRAWN: 8/18/22 - JMB

SCALE: 1" = 60'

REVISED: 11/28/22-DWB

DRG JOB No. 22263

WELL NAME CHANGE

304b(7)Bv FACILITY

CONSTRUCTION LAYOUT DRAWING 5 OF 5

FACILITY LAYOUT DRAWING
WAVETECH HELIUM, INC.

#1 WAVETECH HILLMAN FAMILY TRUST 43-15
NESE, SECTION 15, T. 12 S., R. 43 W., 6th P.M.,
CHEYENNE COUNTY, COLORADO

EMERGENCY CONTACTS

a. Wavetech Helium Inc.

Name	Title	Office Number	Cell Phone
Igor Gendelman	Corporate Contact	303-354-3383	720-280-7415
Logan Ramseier	Field Representative		970-567-8282
24 Hour Emergency Phone Number: 720-280-7415			

b. First Responders

Name	Staffing	Emergency Number	Dispatch Phone
Cheyenne Wells Fire Department	Volunteer	911	719-667-5633
Cheyenne County Sheriff	Full Time	911	719-767-5633
Colorado State Patrol	Full Time	911	

c. Regulatory Contacts

Name	Office Number	Cell Phone
COGCC	303-894-2100	None
CDPHE	877-518-5608	None
CPW	303-291-7227	None
National Response Center	800-424-8802	None

d. Medical Facilities

Name	Office Number	Location
Keefe Memorial Hospital	719-767-5661	Cheyenne Wells, CO
Kit Carson County Memorial Hospital	719-346-5311	Burlington, CO

e. Spill Response

Name	Office Number	Cell Phone
Igor Gendelman	303-354-3383	

f. Fire, Explosion, associated with loss of well control

Name	Emergency Number	Dispatch Phone
Cheyenne Wells Fire Protection District	911	719-767-5633
Cheyenne County Fire Protection District 1	911	719-767-5869
Office of Emergency Management		719-342-3120

g. Local Government Contacts

Name	Title	Cell Phone
Darin Dickey	County Commissioner	719-767-5872
Jerry Allen	Land Use Administrator	landuse@co.cheyenne.co.us

SPILL RESPONSE AND REPORTING

a. Spill Response

The most common release will be unrefined produced water. Refined petroleum products such as diesel, gasoline, and motor oil spills are less common, but still equally important to mitigate. If a spill is found reportable, it will be mitigated in accordance with Colorado Oil and Gas Conservation Commission (COGCC) and Colorado Department of Public Health and Environment (CDPHE) guidelines.

Once a release has been identified, it will be immediately stopped and contained if possible and is safe to do so. When containing a spill; pig blankets, snakes, absorbent materials, or earthen berms will be constructed around the release to keep material from spreading. These materials will be provided by a contract company and kept on-site. Diligent efforts will be made to minimize contact with live vegetation or open water if release is outside of secondary containment structures.

b. Spill Reporting

What determines a reportable spill and to whom does the report go?

A spill/release will be reported to the COGCC if released material is property of Wavetech and meets the COGCC reporting thresholds (see below), an example would be produced water from a water vault.

A spill/release will be reported to the CDPHE if released material is in the custody of a third party for spills that meet CDPHE reporting thresholds, are of any size that impact or threaten to impact waters of the state, a residence or occupied structure, livestock or public byway. An example would be a water hauler over filling a truck and spills product onto the ground next to a flowing irrigation ditch.

Once a spill is determined reportable, there is a 24-hour deadline to make initial notification to the COGCC or CDPHE depending on product ownership. Spills/releases in the custody of Wavetech will be reported by a Company representative. Spills/releases in the custody of a third party will be reported by the responsible company's EHS Department to the appropriate agency and to Wavetech. These regulatory guidelines will be strictly followed by Wavetech and any contractors operating under Wavetech guidance during all activities at the 1 Wavetech Harker-Family 31-22 and 1 Wavetech Harker-Family 31-22.

EVACUATION INFORMATION

a. Evacuation Plan Procedures

The procedure to be used in alerting nearby persons in the event of any occurrence that could pose a threat to life or property will be arranged and completed with public officials in detail.

In the event of an actual emergency, the following steps will be immediately taken:

1. The Wavetech representative will immediately notify proper authorities, including the sheriff's office, highway patrol, and any other public officials as described above and will enlist their assistance in warning residents and transients in the calculated radius of exposure.
2. The Wavetech representative will coordinate with local authorities to warn residents' down-wind of the location and within radius of exposure from the well site. Additional evacuation zones may be necessary as the situation warrants.
3. The Wavetech representative will coordinate with appropriate emergency personnel to divert traffic in the vicinity away from the potentially dangerous area. No trespassing and warning signs will be posted at the entrance to the well site. The contract company will monitor essential and non-essential traffic on-site.

General:

1. The area included within the radius of exposure is considered to be the zone with the maximum potential hazard. When it is determined that conditions exist which create an additional area (beyond the initial zone of maximum potential hazard) vulnerable to possible hazard, public areas in the additional hazardous area will be evacuated.
2. In the event of a disaster, after the public areas have been evacuated and traffic stopped, it is expected that local civil authorities will have arrived and within a few hours will have assumed direction of and control of the public, including all public areas. Wavetech will cooperate with these authorities to the fullest extent and will exert every effort by careful advice to such authorities to prevent panic or rumors.
3. Wavetech will dispatch appropriate personnel to the disaster site as soon as possible. The company's personnel will cooperate with and provide such information to civil authorities as they might require.

COORDINATION WITH FIRST RESPONDERS

In the event of an emergency requiring First Responders, Unified Command will be established between the Wavetech appointed company man on location and First Responders present. Unified Command post will be established based on conditions present at time of incident.

INCIDENT TYPES

a. Loss of Well-Control

What is it?

“Loss of well-control” means the uncontrolled flow of formation or other fluids from an exposed formation (an underground blowout) or at the surface (a surface blowout), flow through a diverter or uncontrolled flow resulting from a failure of surface equipment or procedures.

What are the unique response procedures?

The Operator will contact well-control personnel to reestablish control of the well. Reference the emergency contact list for well-control contractor contact information. The Operator personnel and contractors will take all reasonable measures to manage loss of well-control based on the level of training, knowledge and skills while waiting for arrival of well-control specialists. At a minimum, personnel will maintain positive scene control and security.

What are the unique reporting requirements?

Loss of well-control typically require emergency reporting at the local level to ensure the local authorities are notified (call 911). Additional reporting requirements are related to whether or not petroleum products are released into the environment and other COGCC rules.

b. Explosion

What is it?

Explosions include the rapid destruction of separators, tanks or any type of equipment as result of over-pressurization and the subsequent failure of pressure relief devices, regardless of cause. This includes boiling liquid expanding vapor explosions (BLEVE).

A BLEVE is an explosion caused by the rupture of a vessel containing a pressurized liquid above its boiling point. There is a possibility of a BLEVE at the storage tanks on location as well as any other vessel capable of holding pressure and fluid. A BLEVE caused from a vessel containing oil can result in a secondary explosion of the Volatile Organic Carbon's (VOC) released into the atmosphere.

What are the unique response procedures?

Establish an initial evacuation and isolation zone immediately and prevent access. Maintain scene security until additional resources arrive who will take over. Established hot and warm zones must be expanded as is necessary. Muster areas may require moving from their designated locations. Evacuation of surrounding areas may be indicated. The on-scene supervisor will immediately communicate suggested evacuations of the surrounding area to authorities as needed.

What are the unique reporting requirements?

Immediately notify emergency services to the fire's type, approximate size and rate of spread. Additional reporting may be required if the explosion is accompanied by the release of a hazardous material.

c. Injury or Illness, regardless of cause

Any injury or illness to persons on location. This is to include all medically based and toxic exposure-based illnesses and injuries.

What are the unique response procedures?

EMS will need to be given as much information regarding the illness or injury before they arrive. Also, firstaid trained employees may render assistance, and require equipment to do so, until EMS arrives. Due to the remote location, Flight for Life maybe the best option for transportation to the nearest and most capable medical facility. See contact information for medical facilities.

What are the unique reporting requirements?

Any injury or illness that results in an inpatient hospitalization, amputation or eye loss must be reported to OSHA within 24-hours. Any work-related fatality must be reported to OSHA within 8-hours. Contact the emergency coordinator if any employee or contractor is injured while working.

d. Fire Associated with Well

What is it?

This includes any fire that is associated with the wellhead or wellbore directly. Fires in this category can also include equipment, such as a coil rig, that is temporarily connected directly to the wellbore. This doesnot include fires that are isolated to equipment on location or the location itself that does not pose a threat directly to the well.

What Are the Unique Response Procedures?

Isolate equipment to the extent it can be safely done. Isolate the location. Maintain positive scene control. What Are the Unique Reporting Requirements?

Emergency services should be notified immediately and the type, approximate size and rate of spread ofthe fire disclosed to dispatch.

e. Vehicle Crash on Location

Any incident on location that involves the collision of a vehicle with another vehicle or piece of equipment to include the wellhead itself. The vehicle does not have to be determined inoperable to meet this definition. This also is to include all heavy equipment that may be found on location. Such as backhoes, skid steers, cranes, loaders, etc.

What are the Unique Response Procedures?

Care should be taken to de-energize any lines or equipment including the vehicle that is involved in the incident to reduce the possibility of fire or explosion. EMS will need to be given as much information regarding the injury before they arrive. Also, first aid trained employees may render assistance, and require equipment to do so, until EMS arrives. Due to the remote nature of the site, Life Flight Dispatch will be initiated if warranted.

What are the Unique Reporting Requirements?

Accident reports must be submitted to COGCC in a timely manner. Report to insurance agencies.

f. Natural Disasters

Any and all natural disasters including but not limited to, flooding, tornadoes, lightning strikes, severe storm, etc. Natural disasters can fall into all three categories of response with appropriate forewarning.

What Are the Unique Response Procedures?

Natural disasters can pose significant hazards due to potential release of hydrocarbons and other toxic substances. The emergency coordinator will share information on impending natural disasters that may impact a site. Employees and contractors will notify the emergency coordinator in the event they become aware of an impending natural disaster. Employees and contractors will take appropriate actions to secure each site to help minimize problems.

Preventative actions can include shutting in wells, removal of portable equipment from the site, confirmation that confirm integrity of previously installed protective measures and other similar efforts.

What Are the Unique Reporting Requirements? Reporting requirements are based on the outcome.

TRAINING REQUIREMENTS

This plan requires training in several areas. At a minimum, employees and contractors will have:

- 1) Initial training on the plan's contents and basic emergency-response procedures for all Wavetech employees and contractors that work at their locations.
- 2) Annual retraining to remind personnel of key areas and to update employees on new and emerging considerations that impact emergency activities.
- 3) Topical training that covers the appropriate emergency type including, but not limited to, the following:
 - a) HAZWOPER Level I/II First-Response Operations HAZWOPER training for leasehold-operators/pumper-gaugers
 - b) HAZWOPER Level III Hazardous Materials Technician (24-hour) for anyone that cleans up hazardous materials (except for incidental releases)
 - c) HAZWOPER Level III Hazardous Materials Technician and Level V IC training for anyone that serves as an Incident Commander.
 - d) Training on the contents of this plan and site plans (this training may be conducted as part of other training or as separate sessions)
 - e) SPCC training for leasehold-operators/pumper-gaugers as described in sections 4.1 and 4.3 of the SPCC plan (this training may be conducted as part of other training or as separate sessions)
 - f) Level I Well-Control Awareness for leasehold-operators/pumper-gaugers
 - g) Incipient fire-fighting and emergency fire-extinguisher use for all leasehold-operators/pumper-gaugers and anyone else that may use a fire-extinguisher at a site
 - h) Confined space rescue training for employees tasked with this responsibility (initially and as needed to retain skills appropriate for the rescue situations encountered)
 - i) First Aid, CPR and Automated External Defibrillator (AED) training initially and once every two years thereafter to maintain certification at required levels.
 - j) Other appropriate training

Wavetech documents and retains all of the following records:

- Employee training records
- Contractor-employee training records
- Records of any hazardous materials releases
- Records required under the SPCC plan
- Other related records in conformance with applicable laws and regulations