

Dust Mitigation Plan – 304.c.(5)

Federal RG 22-24-299 Oil and Gas Location

New Location

March 2023



INTRODUCTION

TEP Rocky Mountain LLC (“TEP”) has developed the following Dust Mitigation Plan, which describes the methods TEP may use to minimize and / or mitigate fugitive dust generated from the development of proposed wells on the Federal RG 22-24-299 pad. Fugitive dust is typically created during construction activities and from vehicular traffic on dirt or gravel roads. Additionally, fugitive dust can be propagated from the well pad and gravel roads during high wind events. Application of dust control measures, as described below, minimizes the potential for adverse impacts from fugitive dust generated during development. This dust mitigation plan is being submitted as required by COGCC Rule 304.c.(5) and based on the requirements outlined in COGCC Rule 427.

WELL SITE LOCATION AND ACCESS

The Federal RG 22-24-299 OGDG involves the construction of the new Federal RG 22-24-299 Oil and Gas Location to support proposed drilling, completion, and produced water injection operations associated with the two (2) new injection wells, construction of the a new access road, installation and operation of a new produced water pipeline, which ties into TEP’s waste management system, and utilization of other existing facilities (i.e. Mautz Ranch) to support construction, drilling, completion and injection operations.

The Federal RG 22-24-299 pad is a proposed Oil and Gas Location located within SE¼NW¼ of Section 24, Township 2 South, Range 99 West, 6th P.M., Rio Blanco County, Colorado, on Federal land managed by the Bureau of Land Management (BLM). The pad will be accessed from State, local, lease roads, and by a newly proposed access road. Beginning at the intersection of Rio Blanco County Road 5 and County Road 24, proceed west and then north along County Road 24 approximately 37,488 feet, or 7.1 miles, to the intersection with County Road 68. Proceed on County Road 68 in a southwesterly direction approximately 25,872 feet, or 4.9 miles, to the intersection of the proposed Federal RG 22-24-299 access road. From the intersection of County Road 68 and proposed Federal RG 22-24-299 access road, turn left, and proceed south and then east approximately 636 feet, or 0.12 miles, to the proposed Federal RG 22-24-299 pad site entrance.

Rio Blanco County Road 24 is an improved paved road maintained by Rio Blanco County Road and Bridge. Rio Blanco County Road 68 is a dirt/gravel and maintained by the Rio Blanco County. Please see the Access Road Map attached to the Form 2A for a depiction of the proposed access route.

The Federal RG 22-24-299 pad will be constructed to a 5.304-acres footprint to support drilling, completion, and injection operations associated with the two (2) proposed directional injection wells. Of the 5.304-acres of proposed surface disturbance, approximately 5.244-acres will be considered new disturbance and 0.060-acres will be considered re-disturbance (disturbance within a previously reclaimed area). The long-term disturbance, or the disturbance required for long-term injection operations, attributed to the Federal RG 22-24-299 pad, will be approximately 0.603-acres. All proposed surface disturbance associated with the Oil and Gas Location will be located on BLM surface.

The new Federal RG 22-24-299 lease road will be constructed from CR 68 to the proposed pad entrance. The proposed access road construction associated with development of the proposed injection wells on the Federal RG 22-24-299 pad will create approximately 0.954-acres of surface disturbance. Of the 0.954-acres of surface disturbance, approximately 0.844-acres will be considered new surface disturbance and 0.110-acres will be considered re-disturbance. The long-term disturbance, or the disturbance required for

long-term injection operations attributed to the Federal RG 22-24-299 access road, will be approximately 0.370-acres.

The proposed pipeline corridor associated with development of the proposed injection wells on the Federal RG 22-24-299 pad will create approximately 0.639-acres of surface disturbance. Of the 0.639-acres of surface disturbance, approximately 0.159-acres will be considered new surface disturbance and approximately 0.480-acres will be considered re-disturbance (i.e., reclaimed CR 68 ROW / existing pipeline corridor). No long-term disturbance will be attributed to the proposed pipeline following reclamation of the pipeline ROW. All proposed surface disturbance associated with permanent pipeline installation will be located on BLM surface.

The total surface disturbance associated with the Federal RG 22-24-299 OGDG is approximately 6.897-acres, all of which will be located on BLM surface and includes new construction of the Federal RG 22-24-299 pad, construction of a new access road, and the installation of the proposed water pipeline. Of the 6.897-acres of disturbance, 0.650-acres will be within areas previously disturbed areas by development activities. Approximately sixty-two percent (9%) of the total disturbance acreage will be on lands previously disturbed. The long-term disturbance, or disturbance remaining after interim reclamation, will be approximately 0.973-acres.

DUST MITIGATION

TEP will employ several methods to minimize and / or mitigate fugitive dust during construction, drilling, completion, and injection operations associated with development of the proposed wells on the Federal RG 22-24-299 pad.

TEP has notified Rio Blanco County of the proposed development plan for the Federal RG 22-24-299 and will continue to coordinate with Rio Blanco County regarding traffic and maintenance activities along county roads.

The proposed lease road from County Road 68 to the Federal RG 22-24-299 pad will be maintained by TEP in a manner that minimizes fugitive dust during all phases of development. The following describes the proposed surface conditions, the anticipated usage of the proposed road, and the mitigation measures proposed to minimize and / or mitigate fugitive dust.

1. Soil Types: Soils in the project area are described in Table 1, Soil Types within Project Area. Please see the Natural Resources Conservation Service (“NRCS”) Map Unit Description, attached to the Form 2A, for each of the soil types listed below for more details on the soil within the project area.

Table 1, Soil Types within Project Area

Map Unit	Soil Series	Additional Information	Project Components
64	Piceance fine sandy loam, 5 to 15 percent slopes	Ridges; Colluvium and/or eolian deposits derived from sandstone	Federal RG 22-24-299 Pad Proposed Waterline Corridor Proposed Access Road
70	Redcreek-Rentsac complex, 5 to 30 percent slopes	Ridges, mountainsides; Eolian deposits and/or residuum weathered from sandstone	Federal RG 22-24-299 Pad Proposed Waterline Corridor Proposed Access Road

2. **Speed Limits:** The speed limit for the proposed access road to the Federal RG 22-24-299 pad will be fifteen (15) miles per hour. TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions.
3. **Total Soil Disturbance:** The total project disturbance of the Federal RG 22-24-299 OGD, including the pad, road, water pipeline, and the associated injection equipment is approximately 6.897-acres. Please see the Plan of Development attached to the Form 2A for a detailed breakdown of the project disturbance by project component.
4. **Paved Access:** The proposed access road to the Federal RG 22-24-299 pad is not and will not be paved.
5. **Anticipated Truck Trips:** During each phase of development, TEP or its contractors will utilize semi-trucks to haul heavy equipment to the location and will utilize heavy duty pickup trucks to transport personnel and other lightweight materials to the Oil and Gas Location. Please see Table 2, Anticipated Truck Trips, for a breakdown of the anticipated truck trips.

Table 2, Anticipated Truck Trips

Development Phase	Number of Semi-Trucks	Number of Pickup Trucks	Total Truck Trips
Construction	131	240	371
Drilling	188	640	828
Completion	495	240	735
Interim Reclaim	17	42	59
Injection ¹	12	208	220
Total	843	1370	2213

¹Injection truck trips are based on a one-year estimate. Truck trips will decrease over the life of the wells based on well performance.

6. **Fugitive Dust Suppression During Windy Conditions:** During dry and windy weather conditions the following dust suppression methods will be utilized:
 - a. During wind events in excess of 13 miles per hour, TEP construction contractors will apply fresh water from an approved fresh water 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.
 - b. During sustained high wind events over 25 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.
7. **Best Management Practices:** The following Best Management Practices will be utilized during development of the Federal RG 22-24-299 Oil and Gas Location to minimize or mitigate fugitive dust:
 - a. **Pad / Road Construction:** Fresh water will be periodically applied to disturbance areas during construction to minimize fugitive dust.
 - b. TEP will not use produced water or other process fluids for dust suppression.
 - c. **Construction 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 25 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.

- d. Road Surfacing: The proposed lease road will be graveled during site construction and in sufficient quantities to ensure there is sufficient gravel on the road to minimize fugitive dust.
- e. 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 proposed access road will be fifteen (15) miles per hour;
- f. Road Maintenance: During long-term injection operations, TEP will conduct annual inspections of the proposed access 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.
- g. 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.
- h. Soil Management: Topsoil and stockpiled soils will be stabilized through either tackifiers, seeding practices, or erosion control blankets.