

FORM  
2A  
Rev  
05/22

State of Colorado  
Energy & Carbon Management Commission

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



Document Number:

403335162

(SUBMITTED)

Date Received:

04/25/2023

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
230400132		

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 # 211200237
- 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: JOHN PIEKARA  
 Phone: (720) 929-3094  
 Fax: ( )  
 email: JOHN\_PIEKARA@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: EAST STREET Number: 14-22HZ

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: SWSE Section: 22 Township: 3N Range: 63W Meridian: 6 Ground Elevation: 4749  
Latitude: 40.204859 Longitude: -104.422164  
GPS Quality Value: 1.4 Type of GPS Quality Value: PDOP Date of Measurement: 02/14/2023

### 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 #  
Well Site is served by Production Facilities 403335243

### 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: 02/14/2023

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

Status/disposition date: 04/27/2023

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: 970-400-3580

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.

< 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: \_\_\_\_\_

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:

A Comprehensive Development Plan (CDP) was filed with Weld County Oil and Gas Energy Department on February 14, 2023 and approved on April 27, 2023. The CDP's WOGLA number is: 1041WOGLA22-0044. Site specific 1041WOGLA23-0030 for this location will be submitted. CDP final order attached as "other".

## 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: 07/20/2022

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? Yes

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 checked="" 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:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
	40.162599	-104.425475												Further from existing central road and utility corridor. No ALA criteria met.

## SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Cervi Enterprises, Inc

Phone: 970-356-6000

Address: PO BOX 1930

Fax:

Address:

Email: jacque@producersfl.com

City: Greeley

State: CO

Zip: 80632

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	10	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	2
Pump Jacks	10	Separators	2	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	0
Meter/Sales Building	0	Pigging Station	0			Vapor Recovery Towers	0		

## OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
gas lift meter	10
line heater	1
chemical totes	3
electrical box / transformer	1
air compressors	1
E house	1

### OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
temp sand tanks	2
propane tank	1
sand traps	3
purge flares	3
ECD	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 - 3" size (outside diameter), constructed of carbon steel. Individual carbon steel lines flowlines carry oil, water and gas to the header, from the manifold there will be two - 8" carbon steel lines, flowing combined oil, water gas to the related Location's production facility. See comments for further description.

### 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):			Details of Condition(s)	604.b. (4)
			604.b. (1)	604.b. (2)	604.b. (3)		
Building:	5280 Feet	E					
Residential Building Unit (RBU):	5280 Feet	SE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
High Occupancy Building Unit(HOBU)	5280 Feet	SE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Designated Outside Activity Area:	5280 Feet	SW					
Public Road:	5280 Feet	S					
Above Ground Utility:	181 Feet	NE					
Railroad:	5280 Feet	S					
Property Line:	71 Feet	S					
School Facility:	5280 Feet	SW					
Child Care Center:	5280 Feet	SW					
Disproportionately Impacted (DI) Community:	5280 Feet	NW					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet	NW	<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	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: 16.60

Size of location after interim reclamation in acres: 3.19

Estimated post-construction ground elevation: 4748

### 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: Centralized E&P WMF

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

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

AG

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

Reference Area Latitude: 40.204837

Reference Area Longitude: -104.424885

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

Plant Community	Dominant vegetation
Disturbed Grassland	Blue grama ( <i>Bouteloua gracilis</i> )
Disturbed Grassland	Common sunflower ( <i>Helianthus annuus</i> )
Disturbed Grassland	Prickly Russian thistle ( <i>Salsola tragus</i> )
Disturbed Grassland	Needle-and-thread grass ( <i>Hesperostipa comata</i> )
Disturbed Grassland	Prairie spiderwort ( <i>Tradescantia occidentalis</i> )
Disturbed Grassland	Western wheatgrass ( <i>Pascopyrum smithii</i> )

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: 69 - Valent sand, 0 to 3 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: 1813 Feet N

Spring or Seep: 5280 Feet N

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 11 Feet

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

A groundwater monitoring well was installed at this proposed location to a depth of 12'. Groundwater was encountered at 11'2".

## SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 465 Feet N

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: 465 Feet N

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

Field Delineated Wetland

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):

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: 03/29/2023

**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):

High Priority Habitat (list all that apply)	Oil and Gas Location	Access Road	Utility or Pipeline Corridor
1202.d.(4) - Pronghorn migration & winter			x
1202.d.(3) - Mule deer migration & winter	x	x	x

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? Yes

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? Yes

Direct impact habitat mitigation fee amount: \$ 39614.25

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? Yes

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? Yes

Indirect impact habitat mitigation fee amount: \$ 73101.88

**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 Target	CDPHE Recommendation	COGCC Action
	Water		
	Description	Documentation / stormwater management plan: If it is infeasible to install or repair a control measure immediately after discovering a deficiency, operator will document and keep on record in the stormwater management plan: (a) a description of why it is infeasible to initiate the installation or repair immediately; and (b) a schedule for installing or repairing the control measure and returning it to an effective operating condition as soon as possible.	
	CDPHE Comment		
	Water		
	Description	Down gradient controls: Operator will install adequate down gradient controls if they can not have a control at the source	
	CDPHE Comment		
	Air		
	Description	Engines: Operator will use tier IV or better engines for drilling - Commit to natural gas generators with battery for the drilling rig	
	CDPHE Comment		
	Air		

Description	Electrification: Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)
CDPHE Comment	
Air	
Description	Oil, water, and gas will be routed through permanent facility equipment during flowback, with the exception of temporary sand handling equipment that is necessary to prevent damage to the permanent facility. Emissions associated with the sand will be managed with a temporary ECD.
CDPHE Comment	
Water	
Description	CPGCC permit will incorporate other agency water quality protection plans by reference as applicable (e.g. stormwater management plan)
CDPHE Comment	
PFAS	
Description	Operator will coordinate with nearby fire district(s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard - Fire Districts are a part of Colorado Preparedness and Response Network so they have been involved in the PFAS evaluations
CDPHE Comment	
Air	
Description	Operator will use lease automated custody transfer (LACT) system to remove/reduce the need for truck loadout
CDPHE Comment	
Air	
Description	Operator will implement ambient air quality monitoring on site - KMOG commits to monitoring during drilling and completion operations and for the first 6 months of production in accordance with Reg. 7.
CDPHE Comment	
Air	
Description	Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling
CDPHE Comment	
Air	
Description	Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic
CDPHE Comment	
Air	
Description	Odor mitigation: operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore
CDPHE Comment	
PFAS	
Description	If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water - Commit, if used by a third party to address a KMOG issue.
CDPHE Comment	
Water	
Description	Vehicle fueling: Operator will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections
CDPHE Comment	

Water	
Description	Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations
CDPHE Comment	
Water	
Description	Dust suppression: Operator will not use produced water or other process fluids for dust suppression
CDPHE Comment	
Waste	
Description	Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream)
CDPHE Comment	
Air	
Description	Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents
CDPHE Comment	
Air	
Description	Operator will use non-emitting pneumatic controllers
CDPHE Comment	
PFAS	
Description	If PFAS-containing foam is used at a location: operator 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 - Commit, if used by a third party to address a KMOG issue.
CDPHE Comment	
Water	
Description	Vehicle fueling: Operator will refuel vehicles only on impervious surfaces and never during storm events
CDPHE Comment	
Air	
Description	Odor mitigation: operator will use zero VOC (group III, low/negligible odor) drilling mud
CDPHE Comment	
Water	
Description	Operator will use Modular Large Volume Storage Tanks - KMOG is planning an MLVT on three Oil and Gas locations in the Colt OGDP to utilize as necessary
CDPHE Comment	
Air	
Description	Operator will use vapor recovery units (VRUs) to capture and route storage vessel gas to pipeline
CDPHE Comment	
Water	
Description	Stream crossing and Road Construction: Operator will ensure that control measures are designed, installed and adequately sized in accordance with good engineering, hydrologic and pollution control practices
CDPHE Comment	
Water	

Description	Outfall locations: Outlet protection should be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow. Outlet protection should be provided where the velocity at the culvert outlet exceeds the maximum permissible velocity of the material in the receiving channel.
CDPHE Comment	
Water	
Description	Secondary containment: Operator will install perimeter controls to control potential sediment-laden runoff in the event of spill or release from Modular Large Volume Storage Tank
CDPHE Comment	
Air	
Description	Operator will properly maintain vehicles and equipment
CDPHE Comment	
Waste	
Description	Operator will properly test for and dispose of TENORM
CDPHE Comment	
Air	
Description	Odor mitigation: Operator will ensure that all drilling fluid is removed from pipes before storage
CDPHE Comment	
Water	
Description	Stormwater inspections: Operator will conduct stormwater inspections immediately after storm event
CDPHE Comment	
PFAS	
Description	If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and extent of contamination - Commit, if used by a third party to address a KMOG issue.
CDPHE Comment	
Air	
Description	Odor mitigation: operator will cover trucks transporting drill cuttings
CDPHE Comment	

## PLANS

Total Plans 15  
 Uploaded:

- (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 checked="" 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 checked="" type="checkbox"/> 304.c.(12). Gas Capture Plan               |
| <input type="checkbox"/> 304.b.(13). Proximate Local Government              | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> 304.c.(20). Community Outreach Plan        |
|  | <input type="checkbox"/> 304.c.(21). Geologic Hazard Plan                      |

## OPERATOR COMMENTS AND SUBMITTAL

Comments

KMOG is providing an Alternative Location Analysis in anticipation of 2023 HPH data being approved through rulemaking. Habitat mitigation fees have been determined through consultation with CPW.

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: Flowlines will flow to the production facility location at ROAN ANGEL 5-23HZ (2A doc# 403335243). During production, flow direction in the flow lines is from the wellhead to the production facility. The size of flow lines is typically 3". 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 related 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.

KMOG is proposing one 50,000 bbl MLVT for this location - 12 feet tall and 176 feet diameter. The vendor of the MLVT is Well Water Solutions. This MLVT could be on location to help support water needs on other Oil and Gas Locations in the Bronco CAP (approximately two years). KMOG is also proposing one MLVT up to 25,000 bbl - 36 feet tall and 70 feet diameter. The vendor of the MLVT is Shalestone and will be utilized for completions operations at this Location (approximately three months). These MLVTs are >5280' from the nearest RBU and are not immediately upgradient from waters of the state. Please see additional mitigation measures in the BMP section which apply to both MLVTs.

A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred and was determined not in pronghorn winter concentration area HPH.

Although not required a community consultation plan has been attached and labeled "other".

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

Signed: \_\_\_\_\_ Date: 04/25/2023 Email: DJRegulatory@oxy.com

Print Name: John Piekara Title: Regulatory 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.**

<u>COA Type</u>	<u>Description</u>
0 COA	

### Best Management Practices

No BMP/COA Type	Description
1 Planning	<p>Access Road: KMOG will utilize an existing access road from Highway 34 for drilling, completions, and production operations, including maintenance equipment. The road will be properly maintained to accommodate for emergency vehicle access. An access permit has been obtained from CDOT.</p>
2 Planning	<p>The MLVT will be in compliance with the following COGCC safety setbacks. 1) Seventy-five (75) feet from a wellhead, fired vessel, heater-treater, or a compressor with a rating of 200 horsepower or more; 2) Fifty (50) feet from a separator, well test unit, or other non-fired equipment.</p> <p>Signs shall be posted on each MLVT to indicate that the contents are fresh water and that no E&amp;P waste fluids are allowed. Location and additional signage shall conform to Rule 210.</p> <p>MLVT will be operated with a minimum of 1 foot freeboard at all times.</p> <p>Access to the tanks shall be limited to operational personnel.</p> <p>Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications. KMOG follows manufacturers Standard Operating Procedures (SOPs) and will provide these SOPs upon request to the COGCC.</p> <p>KMOG will conduct daily, visual inspections of the exterior wall and general area for any integrity deficiencies before, during, and after filling the MLVTs. If deficiencies are noted, KMOG will repair them as soon as practicable. Records of repairs will be maintained per Rule 205.</p> <p>KMOG will follow pre-construction risk assessment measures to address safety concerns, and minimize environmental impacts and property damage in the unlikely event of a MLVT release.</p> <p>In the event of a catastrophic MLVT failure, KMOG shall notify the COGCC as soon as practicable but not more than 24 hours after discovery, submit a Form 22- Accident Report within 10 days after discovery, conduct a root cause analysis and provide same to COGCC on a Form 4-Sundry Notice within 30 days of the failure.</p> <p>All MLVT liner seams shall be welded and tested in accordance with applicable ASTM international standards. Any repairs to liners shall be made using acceptable practices and applicable standards.</p> <p>The MLVT shall be constructed and operated in accordance with a design package certified and sealed by a Licensed Professional Engineer either in Colorado or the state where the MLVT was designed or manufactured.</p> <p>KMOG hereby certifies to the Director that the MLVT at this location will be designed and implemented consistent with the Colorado Oil and Gas Conservation Commission policy dated June 13, 2014.</p>
3 Planning	<p>KMOG commits to plugging and abandoning the wells described in the Cumulative Impacts Plan within one year of all wells associated with this OGDG 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.</p>
4 Planning	<p>KMOG commits to plugging and abandoning the wells listed in the beneficial impacts section of the Colt OGDG Cumulative Impacts Plan within one year of all wells associated with this OGDG 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.</p>
5 General Housekeeping	<p>Loadlines: All loadlines shall be bullplugged or capped</p>

6	General Housekeeping	Removal of Surface Trash: A commercial size trash bin for removing debris will be located on site. This bin will be for use by all parties affiliated with the operation. Upon completion of operations, the commercial trash bin will be removed from the location and disposed of in an appropriate manner
7	General Housekeeping	<p>Lighting BMPs</p> <p>Construction Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will only conduct day light operation and there will be no nighttime operations that require lighting.</li> </ul> <p>Drilling Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction where vertical lighting is not required. Where it is required, lights are angled in a vertical direction to provide task lighting for safety and operations involving personnel.</li> <li>• Derrick mast in Section 5.4 is facing horizontally to provide adequate lighting for safe operation.</li> <li>• Lighting is angled away from surrounding off site buildings.</li> <li>• Lighting within the Drilling area has been reduced to provide a minimum acceptable value for safe operation.</li> <li>• Light masts are automatically switched off/on based on lighting sensors.</li> <li>• Lights are switched off when not required.</li> <li>• Low power (63 W) LED lights are used for the drill rig.</li> <li>• In the event of a lightning complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul> <p>Completion and Flowback Phases:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction where vertical lighting is not required. Where it is required, lights are angled in a vertical direction to provide task lighting for safety and operations involving personnel.</li> <li>• Lighting is angled away from surrounding off site buildings.</li> <li>• Lighting within the Completion and Flowback areas have been reduced to provide a minimum acceptable value for safe operation.</li> <li>• Light masts are automatically switched off/on based on lighting sensors.</li> <li>• Lights are switched off when not required.</li> <li>• Lights are directed to task areas only.</li> <li>• In the event of a lightning complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul> <p>Production Phase:</p> <ul style="list-style-type: none"> <li>• KMOG will utilize LED fixtures to reduce skyglow.</li> <li>• KMOG will position all lights to point in a downward direction.</li> <li>• Lighting within the Production areas have been reduced to provide a minimum acceptable value for safe operation.</li> <li>• In the event of a lighting complaint, KMOG will address the complaint and work with all parties involved to ensure the complaint is resolved.</li> </ul>
8	General Housekeeping	The wells are commingled into a bulk and test facility design. This reduces the total number of separators on location on a per well basis which in turn allows KMOG to have a smaller facility footprint. Reducing the total number of separators per well also reduces the total noise and emissions from the separator burners

9	Storm Water/Erosion Control	<p>Stormwater will be managed during construction by a combination of site-specific erosion and sediment control measures including: delineation of limits of construction to establish a work space; a vehicle tracking control placed near the new access road to the well pad and the facility pad to mitigate off-site sediment migration from vehicle traffic onto Highway 34; a temporary diversion ditch &amp; berm around the entire location to manage run-on and run-off; temporary spillways and outlet structure placed around the disturbance area ditch and berm which will allow for settling of sediment from stormwater prior to discharge; culverts, if necessary, with inlet and outlet protection will be installed to direct stormwater to designated discharge points; seed &amp; mulch to stabilize areas no longer needed for construction, as well as for topsoil stockpiles which will remain in place until interim and final reclamation. During active construction, daily inspections will be completed by on-site personnel. A contractor will conduct stormwater compliance inspections every 14- days and/or following a rain event which produces 0.25" of precipitation or equivalent snow melt which causes surface erosion. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed. Maintenance and repair will be completed as soon as practicable, immediately in most cases.</p>	
10	Material Handling and Spill Prevention	<p>Pit Level Indicators: All storage tanks used for active drilling operations (used in lieu of pits) contain pit level monitors with Electronic Drilling Recorders (EDR). KMOG uses EDRs with pit level monitor(s) and alarm(s) for production rigs. Basic level gauges are used on tanks utilized for the surface rig.</p>	
11	Material Handling and Spill Prevention	<p>Operator will not use PFAS on location</p>	
12	Material Handling and Spill Prevention	<p>Oil pipeline takeaway and produced water gathering will be in place for this location's production. There will be no storage of oil or produced water associated with these wells' production.</p>	
13	Material Handling and Spill Prevention	<p><b>A. Material Handling and Spill Prevention</b>  The following site-specific BMPs will be used on Location: During non-active, but while under construction, site inspections will occur every 14 days. When construction is completed and the Location is on production, site inspections will occur every 28 days.</p> <p><b>B. Drilling Operations</b>  During drilling operations, the following site-specific best management practices will be used: Appropriate secondary containment will be utilized when equipment maintenance is conducted on location. KMOG will shut down transfer pump and close supply valve when transfer or circulation is completed. KMOG will ensure fluids cannot enter holding tank through gravity feedback. Pre-job inspection will be conducted prior to start up which include the visual inspection of hoses, lines, and valves to ensure proper connection and alignment. During operations, all fluid containing equipment is inspected daily.</p> <p><b>C. Completion Operations</b>  During completion operations, the following site-specific best management practices will be used: KMOG will monitor pressure responses and containment to identify potential leaks. Lines will also be walked continuously throughout operations (between stages) to identify potential leaks. In addition, there is a slam valve and control valve with Emergency Shut Down system in line to the external temp tanks to prevent overflowing tanks during the flowback duration.</p> <p><b>D. Production Operations</b>  During production operations, the following site-specific best management practices will be used: Automation technology will be utilized at this facility. All automation is monitored by KMOG's Integrated Operations Center (IOC), which is manned 24 hours per day, 7 days per week. All personnel on location on behalf of KMOG are trained in AVO techniques. All personnel are empowered with 'Stop Work Authority' and to report any leaks immediately.</p>	

14	Material Handling and Spill Prevention	<ul style="list-style-type: none"> <li>- Wastes will be stored in containers or on lined containment that are chosen for compatibility and checked periodically for leaks or integrity problems. Examples of containment include but are not limited to 3-sided steel tanks, steel tanks, lined containment, plastic totes, drums, etc.</li> <li>- All specific wastes in the attached site-specific Table will have a detailed Safety Data Sheet available which includes information such as the properties of the wastes; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical.</li> <li>- The proper personal protective equipment will always be worn when handling waste. Employees will refer to the Safety Data Sheet for additional information.</li> <li>- Good housekeeping measures will be implemented in the operating area and to ensure safety and environmental well-being.</li> <li>- Wastes will be segregated and stored according to its waste type.</li> <li>- Wastes will be recycled, re-used, or treated onsite. As a BMP fluid are generally reused from location to location. No onsite treatment or recycling is planned onsite for this location. In the event, that onsite treatment or recycling is feasible, a written management plan will be submitted to the COGCC Director for approval on a Form 4</li> </ul>
15	Dust control	<ul style="list-style-type: none"> <li>- When necessary, KMOG will proactively deploy fresh water to suppress dust along the existing permanent private road and access road to well pad/facility during all phases of preproduction operations</li> <li>- Speed limits will be reduced to 20 mph on the existing permanent private road, 10 mph on new access road and 5 mph once vehicles reach well pad/ facility</li> <li>- Access roads and Vehicle Tracking Control will receive maintenance throughout operations</li> <li>- In the event of high winds that generate dust that cannot be mitigated with an application of water, KMOG will shut down construction operations</li> <li>- During the Completion phase, KMOG will utilize a fully enclosed Sand Containerized Proppant Delivery System that eliminates the use of pneumatic transfer on location. This methodology utilizes a gravity choke feed system that reduces dust significantly. The dust levels from this system are minimal and below Occupational Safety and Health Administration (OSHA) permissible exposure limit which eliminates the need for additional Personal Protective Equipment (PPE)</li> </ul>
16	Construction	<p>Fencing Requirements: The completed wellsites will be surrounded with a fence and gate with adequate lock to restrict access to authorized personnel only. KMOG personnel will monitor the wellsites upon completion of the wells. Authorized representatives and/or KMOG personnel shall be on-site during drilling and completion operations.</p>
17	Noise mitigation	<p>KMOG will install 16-foot full wrap sound walls for pre-production operations that occur at the Locations during the proposed Mule Deer Severe Winter Range HPH seasonal timing window (December 1 – April 30). Sound walls will not be installed for operations that occur outside the seasonal timing window.</p>
18	Emissions mitigation	<p>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. KMOG combusts gas during the facility commissioning process, and agrees to comply with both Rules 903.c.(3).B. and 903.c.(3).C.</p>

19	Odor mitigation	<p>Best Management Practices used during drilling:</p> <ul style="list-style-type: none"> <li>- All oil-based drilling fluids will be built using a Group III base oil with negligible aromatic content and PAH less than 0.001% so that it does not emit odor during all production drilling operations.</li> <li>- The Group III base oil will be utilized in a closed loop drilling fluid system and eliminate odor at the shakers, transfer tank, active/reserve tanks, and cuttings in collection tanks and during transport.</li> <li>- All drill cuttings are processed through centrifugal dryers to remove residual oil-based drilling fluid not removed by shale shakers.</li> <li>- All tubulars pulled out of the hole will be wiped prior to being racked in the derrick or laid down.</li> <li>- Cuttings storage time on location will be minimized prior to transport to local landfills.</li> <li>- New drilling fluid will be built using transfer line outlets located below tank fluid level to minimize splashing/agitation. New fluid will only be built using Group III base oils.</li> </ul> <p>Best Management Practices used during production:</p> <ul style="list-style-type: none"> <li>- KMOG uses pipelines to transport hydrocarbons (oil &amp; gas) and produced water from the production facility eliminating odors that could occur during truck loading.</li> <li>- Production facilities are inspected regularly by KMOG to make sure the equipment is working properly and necessary maintenance is performed, to reduce potential odors. KMOG incorporates Audio, Visual, Olfactory (AVO) observations at production facility inspections.</li> <li>- KMOG will use BMPs to reduce unloading events and to reduce potential odor causing emissions when liquids unloading is necessary (i.e., maintenance activities to remove liquids from existing wells that are inhibiting production).</li> <li>- KMOG remotely monitors production facilities, this reduces traffic onto production facilities which may create odors from truck traffic.</li> </ul>
20	Drilling/Completion Operations	Guy line anchors will not be used. Base Beams will be used to stabilize the rig and removed after drilling.
21	Interim Reclamation	Post construction, daily inspections will be completed by on-site operations personnel. A third-party consultant will conduct stormwater compliance inspections every 30-days until final stabilization is achieved. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed, including weed maintenance when necessary. Maintenance and repair will be completed as soon as practicable, immediately in most cases.
22	Interim Reclamation	Topsoil will be managed during construction by a combination of site-specific erosion and sediment control measures including: a temporary diversion ditch & berm around the entire location to manage run-on and run-off; short term management of topsoil will include track packing to prevent wind and water erosion, long term management includes seeding with a native seed mix and crimping straw mulch for erosion control and water retention; vegetation establishment on stockpiles and weed control will reduce erosion as well as maintain microbial activity; during the construction phase topsoil will be stockpiled to minimize erosion potential. Topsoil managed during interim and production phases will be maintained with BMPs including seeding with a native seed mix and crimped straw mulch; weed monitoring; the longterm topsoil stockpile will maintain microbial activity for an extended time. Inspections will review all control measures / BMPs implemented, their status, and whether repair or replacement is needed, including weed maintenance when necessary. Maintenance and repair will be completed as soon as practicable, immediately in most cases.
23	Final Reclamation	Well Site Cleared: 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.
24	Final Reclamation	Identification of Plugged and Abandoned Wells: Once the well has been plugged and abandoned, KMOG will identify the location of the wellbore with a permanent monument that will detail the well name and date of plugging.

Total: 24 comment(s)

## Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403382050	SURFACE AGRMT/SURETY
403382052	ACCESS ROAD MAP
403382067	DIRECTIONAL WELL PLAT
403382073	LOCATION DRAWING
403382075	RELATED LOCATION AND FLOWLINE MAP
403382078	LOCATION PICTURES
403382079	NRCS MAP UNIT DESC
403382084	LOCATION AND WORKING PAD GIS SHP
403382086	OTHER
403382091	LGD CONSULTATION
403382110	GEOLOGIC HAZARD MAP
403382129	REFERENCE AREA MAP
403382133	REFERENCE AREA PICTURES
403382148	CDPHE CONSULTATION
403454739	ALA DATASHEET
403454948	WILDLIFE HABITAT DRAWING
403460549	CULTURAL FEATURES MAP
403467081	PRELIMINARY PROCESS FLOW DIAGRAMS
403575509	CPW CONSULTATION
403576505	OTHER
403576958	HYDROLOGY MAP
403598133	LAYOUT DRAWING
403598588	ALA NARRATIVE SUMMARY

Total Attach: 23 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Returned to DRAFT for operator to make corrections/revisions.	08/25/2023

Total: 1 comment(s)

**Public Comments**

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

