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# DUST MITIGATION PLAN

**BNL** | ENTERPRISE

**Jackson 31 SENW 3054**

Sec. 31 T30S R54W (SE/4 NW/4)

Las Animas County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application  
and consistent with the requirements of Rule 427.a.

February 9, 2024

Revised: June 18, 2024

# **BNL (Enterprise) Inc. Las Animas County, Colorado**

## **Dust Mitigation Plan**

### **Project Summary:**

#### **Plan:**

BNL (Enterprise) Inc.'s ("BNL's") proposed Jackson 31 SENW 3054 "Location" is in Sec. 31 T30S R54W in Las Animas County, Colorado. BNL plans to drill and test one *helium* well. If the well produces commercial quantities of helium the well will be shut-in for a period of six to nine months until helium production/processing facilities can be constructed on an offsite facility location. The helium facility will be on lands outside of the Oil and Gas Development Plan. The facility will be constructed on private surface. The landowner agreement provides for the installation of the gas gathering line. The production/processing facilities will not require an oil and gas development plan.

#### **Project Overview:**

BNL's Dust Mitigation Plan is intended to facilitate compliance with the applicable regulations of the Colorado Oil and Gas Conservation Commission, the Colorado Department of Public Health and Environment and Las Animas County.

BNL's development of the Jackson 31 SENW 3054 wellpad ("Location") requires earth disturbing activities and travel on unpaved roads which has the potential to produce fugitive dust emissions.

Dust associated with the Location activities and traffic on roads will be minimized throughout all phases such that there are minimal visible dust emissions from the Location or associated roads to the maximum extent practicable given wind and other weather conditions.

No proppant will be used in completion operations.

Cuttings will be disposed of at a commercial facility.

Any chemical application will have Safety Data Sheets on location.

#### **Compliance with Rule 427.a.**

1. Wellpad soil types:

CpB – Calemore silt loam, 0 to 3 percent slopes

WC - Plughat-Villegreen complex, 1 to 4 percent slopes

Access Road soil types:

CpB – Calemore silt loam, 0 to 3 percent slopes

WeB - Wiley silt loam, 0 to 3 percent slopes

2. Proposed vehicle speed limit: 20 MPH or less on roads; 5 MPH or less on the Location.

3. Total disturbed area:

- Wellpad: 1.3 acres
- Access Road: 4.3 acres
- Pipeline: 3.8

**Total Acres of disturbance: 9.4 acres**

4. Access roads will not be paved. During the drilling and testing phase, the new access road will be minimally upgraded to allow for construction and if needed emergency vehicles. If the well proves to be commercial, road will be crowned (with a minimum of 4 inches of gravel) and ditched, as agreed to by the private surface owner. Road surfacing material will consist of limestone, scoria or river rock or as agreed upon by the private surface owner and will be sourced as locally as possible to minimize travel distance.

5. Number of truck trips during the Construction, Drilling, Completion and Production stages:

| <b>Phase of Development</b>     | <b>Yearly Truck Trips</b> |
|---------------------------------|---------------------------|
| Construction (Wellpad & Access) | 96                        |
| Drilling/Testing/Completion     | 104                       |
| Production/Daily Operations     | 365                       |
| <b>Total Truck Trips</b>        | <b>565</b>                |

*Traffic counts are approximate, based on round trips, and may vary due to circumstances.*

6. Plan for Suppressing Fugitive Dust Caused by Wind:

- Stop work orders will be issued during high wind conditions when possible with contiguous activities on location (sustained winds of 25 MPH or greater).
- Regular road maintenance will be implemented to mitigate fugitive dust.
- Avoid unnecessary work on dust generating on high wind days.
- Natural or artificial windbreaks may be utilized as appropriate.
- Utilize gravel in high wind areas on specific portions of roads and wellpads.

7. Best Management Practices:

- BNL will use a 130-mil rig liner during the drilling and testing of the well. The rig liner will be placed under critical wellsite components including the rig and any diesel motors. The entire location will not be lined.
- The wellpad will be constructed to a minimum size to accommodate all equipment but allowing for maximum safety precautions. The rig mat will eliminate fugitive dust from the wellpad. See attached product specs.
- Utilize existing vegetation, trees slash or brush piles to cover disturbed areas not used for vehicle traffic.

- Application of fresh water during dry season.
- Applications of approved chemicals may be applied to areas not needed for traffic to form a less erodible soil.
- Operations will be confined to the wellpad working surface.
- Continuous monitoring of disturbed areas to evaluate additional BMPs needed.
- Fresh water application to disturbed areas during construction.
- Fresh water or magnesium chloride application to graveled surfaced of the Location and associated roads.
- Speed limit signs will be posted per surface owner agreement.
- Contractors will be notified of speed limits if no signs are posted.
- Regular road maintenance such as grading and adding additional gravel as needed.