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# EMERGENCY RESPONSE PLAN



## **Jackson 02 L4 3154**

Sec. 2 T31S R54W Lot 4 (NW/4 NW/4)

## **Jackson 04 L4 3154**

Sec. 4 T31S R54W Lot 4 (NW/4 NW/4)

## **Jackson 27 SWSE 3054**

Sec. 27 T30S R54W (SW/4 SE/4)

## **Jackson 29 SWNW 3054**

Sec. 29 T30S R54W (SW/4 NW/4)

## **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 602.j.

November 28, 2023

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## INTRODUCTION

BNL (Enterprise) Inc. ("BNL") proposed Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054 locations are located in T30S and T31S and R54W, in Sections 2, 4, 27, 29 and 31, in rural Las Animas County, Colorado. BNL plans to drill and test five helium wells. If the wells produce commercial quantities of helium the wells will be shut-in for a period of six to nine months until production facilities for the wells can be placed at on offsite location on private surface. BNL will use a 130-mil rig liner during the drilling and testing of the wells. The rig liner will be placed under critical wellsite components including the rig and any diesel motors. The entire location will not be lined. Minimal soil will be disturbed during this time. The wells will not require hydraulic fracturing. During the drilling and testing phase, the existing access roads will be minimally upgraded to allow for construction and, if needed, emergency vehicles. If the wells prove to be of commercial quantities, the roads will be crowned and ditched per the surface use agreement with the private surface owner(s). All operations would be conducted in compliance with all federal, state, and local applicable laws, rules, and regulations.

BNL (Enterprise) Inc's Emergency Response Plan was sent via email to the Hoehne Fire Protection District. It has been confirmed they will provide emergency cover at the Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054, Locations in Las Animas County, Colorado.

## SECTION 2 - SITE SPECIFIC INFORMATION

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

The minimum personal protective equipment (PPE) to enter any BNL (Enterprise) Inc. 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 BNL(Enterprise) Inc. locations and signage will be in place to disclose this information at the entrance to location. In addition, all personnel entering a BNL (Enterprise) Inc. location must understand and abide by BNL (Enterprise)Inc.'s contractor expectations relating to environmental, health, and safety requirements.

The primary hazards that any person must be aware of while on a BNL (Enterprise) Inc. 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.

### 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**

#### **Jackson 02 L4 3154**

Legal Description – Lot 4 (NW/4 NW/4) Section 2 T31S R54W

Directions: Begin at the intersection of County Road 54 and County Road 183. Travel southeasterly, then northeasterly, then easterly for approximately 1.4 miles along the Jackson 27 SWSE 3054 proposed access road to the start of the beginning of the Jackson 02 L4 3154 proposed access road. Continue easterly along the Jackson 02 L4 3154 proposed access road for 3,212' (0.61 miles) to the proposed location.

Lat/Long: Lat: 37.77597° N      Long: -103.443727° W

**Jackson 04 L4 3154**

Legal Description – Lot 4 (NW/4 NW/4) Section 2 T31S R54W

Directions: Begin at the intersection of County Road 54 and County Road 183. Travel westerly on County Road 54 for approximately 0.3 miles to the proposed Jackson 04 L4 3154 access road. Turn left and travel southerly for 854' (0.16 miles) to the proposed location.

Lat/Long: Lat: 37.377860° N Long: -103.480773° W

**Jackson 27 SWSE 3054**

Legal Description – SWSE Section 27 T30S R54W

Directions: Begin at the intersection of County Road 54 and County Road 183. The Jackson 27 SWSE 3054 access road starts at the intersection. Travel approximately 16,390' (3.10 miles) along the proposed access road to the proposed location.

Lat/Long: Lat: 37.397895° N Long: -103.447426° W

**Jackson 29 SWNW 3054**

Legal Description – (SW/4 NW/4) Section 29 T30S R54W

Directions: Begin at the intersection of County Road 54 and County Road 183. Travel northerly on County Road 183 for approximately 0.5 miles. Continue on the private road for approximately 0.5 miles to the Jackson 29 SWNW 3054 proposed access road. Travel westerly then northerly along the Jackson 29 SWNW 3054 proposed access road for 7,509' (1.42 miles) to the proposed location.

Lat/Long: Lat: 37.403592° N Long: -103.490913° W

**Jackson 31 SENW 3054**

Legal Description – (SE/4 NW/4) Section 31 T30S R54W

Directions: Begin at the intersection of County Road 54 and County Road 179. Travel northerly on County Road 179 for approximately 0.5 miles. Turn right on the proposed Jackson 31 SENW 3054 access road. Travel easterly along the Jackson 31 SENW 3054 proposed access road for 3,731' (0.70 miles) to the proposed location.

Lat/Long: Lat: 37.388810° N Long: -103.505083° W

**d. Site Description**

The Locations are located in rural Las Animas County, Colorado. The surrounding land uses are rangeland and agriculture. There are no Residential Building Units within 2,000' of the Locations. The Jackson 02 L4 3154 and Jackson 27 SWSE 3054 Locations are accessed from County Road 183 and County Road 54. The Jackson 04 L4 3154 Location is accessed from County Road 54. The Jackson 29 SWNW 3054 Location is accessed from a private road off of County Road 183. The Jackson 31 SENW 3054 is accessed off County Road 179. All five locations will only contain one wellhead per location. All production equipment will be located offsite on private surface. All five locations will only contain one wellhead per location. All production equipment will be located offsite on private surface.

All locations will have the following equipment onsite:

- 1 helium well
- 1 separator
- 1 partially buried laydown open top steel cuttings container
- 1 cuttings trench
- 1 tank

**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 Section 3 for the Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054.

**f. Nearby Sensitive Areas**

There is no High Priority Habitat (HPH) within one mile of the Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054 locations. No improvement to the county road will be required. BMPs will be used to protect the nearby intermittent drainage if a spill or release happens. Please reference Fluid Leak Detection Plan, Stormwater Management Plan and Waste Management Plan for specific BMPs.

**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 Material Safety Data Sheets (MSDS) 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 Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054 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. At this point, the primary chemicals stored on site will be compressed helium in tube trailers and fuel for local power generation.

## SECTION 3 – MAPS AND DIAGRAMS

- \* Please see site specific Cultural Distance Drawings, Access Road Maps, and Construction Layout Drawings for additional details.

## EMERGENCY CONTACTS

### a. **BNL (Enterprise) Inc.**

Name	Title	Office Number	Cell Phone
Peter Kondrat	Chief Operating Officer (main company contact)		970-759-5370
Ross Warner	Legal		rwarner@bluestarhelium.com
Andrea Gross – Upstream Petroleum Management Inc.	Community & Public Relations	303-942-0506	720-339-4277
24 Hour Emergency Phone Number: 303-632-0160			

### b. **First Responders**

Name	Staffing	Emergency Number	Dispatch Phone
Hoehne Area Volunteer Fire Department	Volunteer	911	719-695-0810
Piñon Canyon Maneuver Site	Volunteer	911	
Las Animas County Sheriff	Full Time	911	719-846-2211
Colorado State Patrol	Full	911	
Flight for Life Colorado			

### 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
Spanish Peaks Hospital	719-323-5642	Walsenburg, CO (Level IV Trauma Center)
San Rafael Hospital	719-846-9213	Trinidad, CO (Level IV Trauma Center)
St. Mary-Corwin Medical Center	800-228-4039	Pueblo, CO (Flight for Life location)

### e. **Spill Response**

Name	Office Number	Cell Phone
Peter Kondrat		970-759-5370

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

Name	Emergency Number	Dispatch Phone
Hoehne Fire Protection District	911	719-252-2457
Piñon Canyon Maneuver Site	911	
Office of Emergency Management		719-845-2566

### g. **Local Government Contacts**

Name	Title	Cell Phone
Robert Lucero	Las Animas LGD	719-845-2577
Joe Richards	Office of Emergency Management	719-845-2566

## SPILL RESPONSE AND REPORTING

### a. **Spill Response**

These Locations will not produce or encounter any hydrocarbons. 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 BNL (Enterprise) Inc. 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 BNL (Enterprise) Inc. 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 BNL (Enterprise) Inc. These regulatory guidelines will be strictly followed by BNL (Enterprise) Inc. and any contractors operating under BNL (Enterprise) Inc. guidance during all activities at the Jackson 02 L4 3154, Jackson 04 L4 3154, Jackson 27 SWSE 3054, Jackson 29 SWNW 3054, and Jackson 31 SENW 3054 Locations.



## 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 BNL (Enterprise) Inc. 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 BNL (Enterprise) Inc. 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 BNL (Enterprise) Inc. 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. BNL (Enterprise) Inc. 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. BNL (Enterprise) Inc. 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 BNL (Enterprise) Inc. appointed company man on location and First Responders present. Unified Command post will be established based on conditions present at time of incident.

In the event of an emergency the Site Supervisor will call 719-643-3333 which dispatches several volunteer fire departments. Due to the remote nature and volunteer status of the fire departments who actually responds will be determined at the moment.

## 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 equipmentto 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 BNL (Enterprise) Inc. 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

BNL (Enterprise) Inc. 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