

---

# STORMWATER MANAGEMENT PLAN

**Wavetech**  **Helium, Inc.**

**1 Wavetech Hadachek Trust 21-23**

Sec. 23 T13S R43W (NE/4 NW/4)

Cheyenne County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application  
and consistent with the requirements of Rule 1002.f.

December 7, 2023

Revised: September 11, 2024

**1. Introduction**

Wavetech Helium, Inc.'s ("Wavetech's") proposed 1 Wavetech Hadachek Trust 21-23 "Location" is in Sec. 23 T13S R43W in Cheyenne County, Colorado. Wavetech plans to drill and test this conventional well which will produce helium containing natural gas, water, and possibly oil. All gas production will go directly to the existing Ladder Creek Pipeline gathering system at the tie-in point in Sec. 22 T13S R43W (NW/4 NW/4). The existing Ladder Creek Pipeline is operated by Tumbleweed Midstream which will go to the existing gas processing facility on lands outside of this Oil and Gas Development Plan. This well will be drilled, perforated, and tested. The proposed location is fee surface and fee minerals with a total pad disturbance of ±2.6 acres. The graded site elevation is expected to be approximately 4,099'. No federal surface or minerals are involved in this project. All operations would be conducted in compliance with all federal, state, and local applicable laws, rules, and regulations.

**2. Site Description**

Wavetech currently owns or leases oil and natural gas mineral rights in and around Cheyenne Wells, Colorado, in Cheyenne County, Colorado. The Site will be approximately 2.6 acres in size with 0.9 acres for an access road and 6.7 acres for a flowline. The project area includes site-specific access road, well pad, and a flow line that tie into the existing Ladder Creek Pipeline.

The development of this conventional well that will produce fluids and gas, including helium, is generally accomplished in five distinct work phases. The first phase is access road and pad construction, the second phase is the drilling, the third phase is completion, the fourth phase is interim reclamation, and the fifth phase is abandonment with final reclamation. Each work phase is briefly discussed below.

**2.1 Proposed Sequence of Major Activities**

<p>Access Road and Pad Construction</p>	<p>Pad and access road construction will be performed using conventional cut and fill construction. The proposed access road for the 1 Wavetech Hadachek Trust 21-23 well pad will come off of County Road X to the south for approximately 810 feet to the well pad. The road is anticipated to be approximately 50 feet wide, and no cut or fill is anticipated for the access road aside from grubbing, clearing, grading, and stabilization.</p> <p>The pad construction will involve clearing and grubbing, the removal of topsoil from the disturbed area to a stockpile along the east side of the disturbed area, grading, compaction, contouring, and installation of road base as a surfacing material. To the extent possible, permanent control measures such as berms, diversion ditches, and sediment traps will be utilized to control stormwater throughout the life of the facility during this phase.</p> <p>Well pad construction will require an engineered cut on most of the pad to level the pad for operations. Sediment discharge and small amounts of mobile equipment lubricant and fuel are the main potential pollutants of concern during access road and pad construction. The excess material will be piled on the north east side of the wellpad.</p>
---	--

<p>Drilling</p>	<p>The drilling of the 1 Wavetech Hadachek Trust 21-23 well will include the mobilization of the rig and associated equipment, storage of chemicals and fuel, drilling activities, including the installation and cementing of well casing, and demobilization of the rig and associated equipment.</p> <p>Sediment discharge, releases of unused and used chemicals, petroleum products, drilling water/mud, and drill cuttings are potential pollutants of concern during this phase of construction. Fresh water and drilling mud (including chemical additives) will be stored on the pad, typically in large tanks or skid-mounted vertical tanks. Drilling mud and associated materials are captured in tanks and will be hauled to a commercial disposal facility upon well completion. Please reference the Waste Management Plan for details. The drilling company will maintain a Spill Prevention Control and Countermeasure Plan.</p>
<p>Completion</p>	<p>Well completion may last up to 5 days and will involve perforating the Morrow Formation.</p> <p>Sediment discharge and releases of unused and used chemicals are potential pollutants of concern during this phase. As equipment is demobilized at the completion of this phase, the well pad and surrounding areas will be inspected to identify spills or leaks that may have occurred and may impact surface water so that those areas can be remediated.</p>
<p>Production with Interim Reclamation</p>	<p>While the lifespan of the 1 Wavetech Hadachek Trust 21-23 well covered in this SWMP may last up to 20 years, the actual productive life of the well will be dependent on the producing formation, location in the field, and proximity to other wells. The equipment found on site during this phase will include:</p> <ul style="list-style-type: none"> <li>• One wellhead;</li> <li>• Ancillary equipment such as flow measurement equipment and flow lines;</li> <li>• One pump jack;</li> <li>• One 300 bbl oil tank;</li> <li>• One 300 bbl produced water tank;</li> <li>• One gas meter; and</li> <li>• One separator.</li> </ul> <p>Final stabilization of the disturbed area outside of the production area is generally achieved during this phase, with interim reclamation of 1.6 acres, leaving approximately 1.0 acres of working pad surface for production equipment and operations.</p>

<p>Abandonment with Final Reclamation</p>	<p>Once the 1 Wavetech Hadachek Trust 21-23 well is deemed ready to abandon, the location will be recontoured and reclaimed to pre-disturbance conditions and/or in accordance with the surface owner’s wishes.</p> <p>When the well is plugged and abandoned, the wellhead assembly will be removed and the well permanently plugged down hole. The equipment associated with the well will be removed from the location unless being used by other wells in the vicinity, and the flow lines and pipelines may be re-routed or abandoned as required.</p> <p>Following the removal of equipment from the well pad, the location and access road will be recontoured and reclaimed to pre-disturbance conditions in accordance with the Colorado Energy &amp; Carbon Management Commission (CECMC) final reclamation standards and/or in accordance with the surface owner’s wishes. Once it is recontoured, topsoil will be reapplied across the location in preparation for seeding and an appropriate seed mixture will be applied.</p>
---	---

2.2 Estimate of Total Site Disturbance

Approximate Disturbance of Wellpad:

**UNGRADED ELEVATION: 4099.1'**  
**FINAL ELEVATION: 4098.6'**  
**PROPOSED AREA OF DISTURBANCE: 2.6± ACRES**  
**AREA OF WORKING PAD SURFACE: 2.1± ACRES**  
**PROPOSED ACCESS DISTURBANCE: 0.9± ACRES**

**3. Name of Receiving Water(s)**

The location is ±1,296 feet to the north of an un-named intermittent drainage.

**4. Summary of Existing Data That Describe Soil or Potential for Soil Erosion**

Erosion potential is based primarily on-site topography, soil type, and vegetative cover. Using the Natural Resources Conservation Service (NRCS) Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov/app/>), topsoil for the site is classified as Keith-Richfield silt loams, 0 to 2 percent slopes. The Keith-Richfield silt loams complex is classified within Hydrologic Soil Type B. Hydrologic Soil Type B classifications are described as having a moderate infiltration rate when thoroughly wetted and consist of moderately deep to deep, moderately well to well drained soils with moderately fine to moderately coarse textures. Hydrologic Soil Type B classifications are described as having moderately low runoff potential.

**5. Description of Existing Vegetation and Percentage of Ground Cover**

According to the National Land Cover Database, the majority of the project area is located in a “cultivated crops” area, as identified by the National Land Cover Database. Cultivated crops areas are areas used for the production of annual crops, such as corn, soybeans, vegetables, tobacco, and

cotton, and also perennial woody crops such as orchards and vineyards. Crop vegetation accounts for greater than 20% of total vegetation. This class also includes all land being actively tilled.

There are no known weed infestations at this time. Specific vegetation data at the site is documented on the Routine Stormwater Inspection Form.

## 6. Stormwater Management Control Measures

Wavetech has assessed, and will continue to assess, potential pollution sources of stormwater runoff at a pad site. Wavetech will implement and maintain BMPs in accordance with good engineering practices, including measures such as:

- **Transportation of Chemicals and Materials:**
  - Tanks for the storage of fuel, chemicals, and other materials used in drilling and completion activities will be on site through well completion. Loading and unloading of the tanks and releases of materials during these activities could potentially impact stormwater.
  - One 300 bbl oil tank and one produced water 300 bbl will be on site. The contents of these tanks will be transferred to a semi-truck via a connection hose when a pre-determined volume is reached. A drip container will be employed at the connection fittings to catch drips from any loose connections.
- **Vehicle and Equipment:**
  - Routine maintenance will be limited to fueling and lubricating equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance activities will be containerized and transported offsite for disposal or recycling. There will be no major equipment maintenance or overhauls conducted on site. Equipment will be transported offsite for major maintenance or overhauls.
- **Produced Water and Drilling Fluids Storage:**
  - A “closed loop” mud handling system will be utilized. Drill Cuttings are mechanically separated, dried and stored in surface bins and then hauled offsite. Once they are tested and meet the disposal criteria, they will be transferred to a transport truck and hauled to a permitted disposal facility.
- **Outdoor Processing Activities and Machinery:**
  - One vertical well, one pump jack, one 3-phase separator, one 300-barrel (bbl) oil tank and one 300-bbl produced water tank.
- **Erosion and Vehicle Tracking Controls:**
  - In order to limit vehicle tracking of sediment, vehicles will use designated entry points into construction areas. In general, the use of tracking pads is not anticipated to be necessary in the project area due to the sandy, non-cohesive nature of the soils in the project area.

- **Disturbed and Stored Soil:**
  - Disturbed soil and excavated materials will be stored on or next to the well pad within the construction area. Topsoil and other soil will be stockpiled separately and stabilized as needed. Topsoil stockpiles that will be exposed for more than six months will be mulched and/or seeded as a stabilization technique to control sediment loss.
  - Excavated materials will be used as backfill when practicable. An exception may be excess rock generated by excavation activities. In these areas, some select backfill materials may be required to protect the project area. Excess rock may be pushed into rock filter dikes, used in energy dissipation zones below culverts, constructed into rock check dams within grassed swales, or distributed over a portion of the project area.
  - Areas where construction activities that changed the natural topography occurred will be re-graded and contoured to blend into the adjoining landscape, and natural drainage patterns will be re-established to as near pre-disturbance levels as possible during reclamation.
- **Management of Contaminated Soil:**
  - If contaminated soil is encountered at a Wavetech site during construction, additional BMPs will be employed to ensure containment of stormwater runoff. In addition, stockpiles of contaminated soil will be removed from the site and disposed of as soon as practicable, in accordance with environmental regulations. Please see Wavetech's Waste Management Plan for more details.
- **Ground Disturbing Maintenance Activities:**
  - BMPs that are in need of maintenance or may be deemed inadequate for the situation and any deficiencies that are not immediately repairable will be reported to the operator, or the designee for instructions on how to proceed, including, but not limited to, implementing new or modified BMPs to minimize potential pollutant discharges. Preemptive installation and proactive maintenance will be taken to prevent BMP failures and potential discharge of pollutants. There may be times field activities may require the installation or alteration of BMPs. At these times, the field foremen or the Stormwater Program Manager or the designee may choose to implement other BMP designs at their project sites to maintain compliance.
- **Non-Industrial Waste Sources:**
  - See Waste Management Plan for details.

## 7. Site Map

There is one (1) site map included as an Attachment: Stormwater Erosion and Control Map. Please see Interim Reclamation Drawing in the Interim Reclamation Plan. **Structural and Non-structural Best Management Practices**

BMPs for sediment and erosion control will be accomplished through a combination of construction techniques, vegetation, re-vegetation, administrative controls, and structural features.

During periods of active construction, field activities may dictate the installation or alteration of BMP designs between scheduled inspection dates. At these times, the field foremen, Stormwater Program Manager, or the designee may choose to implement other BMP designs at their project site to maintain compliance. In these instances, the site maps are updated during the next inspection to communicate the changes that have taken place since the previous inspection.

Access roads will not be paved. During the drilling and testing phase, the existing access road will be minimally upgraded to allow for construction and, if needed, emergency vehicles. If the well proves to be commercial, the road will be crowned (with a minimum of four 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.

BMPs
Mulch/Seed: Topsoil stockpiles that will be exposed for more than six months will be mulched and/or seeded as a stabilization technique to control sediment loss from stormwater.
Stockpile Tracking: To prevent erosion from stormwater, stockpiles will be tracked perpendicular to runoff direction.

## 9. Temporary and Long-Term Stormwater Management

### Temporary Stormwater Management

Temporary stabilization measures will be implemented for earth disturbing activities on any portion of a site where ground disturbing construction activity has permanently ceased, or temporarily ceased for more than 14 calendar days. Methods for temporary stabilization may include, but are not limited to, tarps, soil tackifier, and/or the application of hydro-seed. The 14-day schedule may be exceeded when either the function of the specific area of the site requires it to remain disturbed or physical characteristics of the terrain and climate prevent stabilization measure application.

Delays in the implementation of temporary stabilization measures will be recorded on the site-specific information as part of the inspection records. In situations where the delay of temporary stabilization measures occurs, an alternative stabilization schedule will be provided, including indication of the location(s) where the alternative schedule is applicable on the site map. The minimum inspection schedule will be followed in temporarily stabilized areas.

### Long-Term Stormwater Management

A Post-Construction Stormwater Program will be incorporated into the Wavetech construction program, following the guidelines set forth in CECMC Rule 1002.f.(3), except that such requirements are not applicable to Tier 1 oil and gas locations. Tier 1 oil and gas locations are defined as:

- An oil and gas location where the slopes are less than five percent (5%);
- The soil has low erosion potential;

- Vegetative cover or permanent erosion resistance cover is greater than seventy-five percent (75%);
- The distance from a perennial stream or Classified Water Supply Segment is greater than five hundred (500) feet; and
- The oil and gas location size is less than one (1) acre, measured by the amount of surface disturbance at the time of the termination of a construction stormwater permit issued by the CDPHE.

Devices that will be installed as a long-term stormwater management control include, but are not limited to, the following: seeding/mulch application. When long-term management items are left in place, a note will be included on the final inspection report identifying this plan. Post-construction inspections are conducted annually unless more frequent inspections are deemed necessary. Actions that can lead to more frequent inspections include repeated maintenance of post-construction related BMPs, observed stormwater erosional characteristics occurring during post-construction phase, or other unforeseen stormwater issues that come into play.

During restoration and reclamation work, required repairs to vegetation and erosion and sediment BMPs will be completed as required.

## **10. Inspection and Maintenance**

A trained and qualified person familiar with the Stormwater Management Plan and stormwater controls will conduct all inspections. The Qualified Stormwater Manager, or their representative, will examine the construction site perimeter, all disturbed areas, material and/or waste storage areas that are exposed to precipitation, discharge locations, and locations where vehicles access the site during each inspection. These areas will be inspected for evidence of or the potential for pollutants leaving the construction site boundaries, entering the stormwater drainage system, or discharging to waters of the state. All erosion and sediment control practices identified in the plan will be evaluated to ensure that they are maintained and operating correctly. Temporary and permanent erosion and sediment BMPs will be visually verified to ensure effective operational condition.

### **Site inspections will be conducted as follows:**

- The first site inspection must be completed within seven (7) calendar days of the commencement of construction activities.
- Active construction sites will be inspected at one of the two following frequencies:
  - o At least one inspection every 7 calendar days; or
  - o At least one inspection every 14 calendar days, if post-storm event inspections are conducted within 24 hours after the end of any precipitation or snowmelt event that causes surface erosion. Note that post-storm inspections may be used to fulfill the 14 day routine inspection requirement.
  - o Wavetech has elected to inspect at least once every 7 days at the location during active construction.

- If a site is considered temporarily idle, that is, no construction activities will occur following a storm event, then a post-storm inspection will be conducted prior to re-commencing constructing activities, no later than 72 hours following the storm event. Routine inspections must still be conducted at least every 14 calendar days.
- For sites or portions of sites in which all construction activities that will result in ground disturbance are completed, all activities for final stabilization, as outlined above in Section 10.2, with the exception of vegetative coverage, are completed, and this SWMP has been amended to locate the areas to be inspected, inspections will be conducted at least once every 30 days, and post-storm inspections are not required.
- Inspections are not required at sites where snow cover exists over the entire site for an extended period of time and construction activities are halted, as long as melting conditions do not exist. The following information must be documented in the inspection record for the use of this exclusion: dates when snow cover occurred, date when construction activities ceased, and date melting conditions began. This only applies when all construction activities cease and typically only at high elevations.

For sites that discharge to a water body designated as an Outstanding Water by the Water Quality Control Division, inspections will be performed at least once every 7 calendar days.

The scope of the inspection will cover the construction site perimeter, disturbed areas, designated haul routes, material and/or waste storage areas that are exposed to precipitation, discharge locations, and locations where vehicles access the site. These areas will be inspected for evidence of, or the potential for, pollutants leaving the construction site boundaries entering the stormwater drainage system or discharging to waters of the state. Erosion and sediment control practices identified in this SWMP will be evaluated to ensure that they are maintained and operating correctly.

A sample Routine Stormwater Inspection Form is attached.

#### **Routine Maintenance**

The following inspection guidelines and maintenance practices are to be used during field inspections and to maintain erosion and sediment BMPs.

- BMPs will be inspected for proper installation and adequate maintenance.
- Work practices will be examined to preserve BMP installations.
- BMPs may still operate in accordance with their design and the requirements of the permit but may require some level of maintenance to prevent a breach of the BMP.
- All BMPs will be maintained in good working order. If a repair is necessary and a qualified Stormwater Manager cannot complete the action item while on site, the work order report will initiate instructions for a sub-contractor to schedule the repair or maintenance item.

### **11. Reports and Record Keeping**

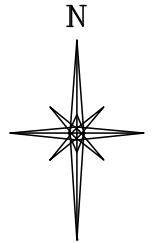
Recordkeeping procedures have been identified to provide accurate and complete documentation of events associated with the stormwater management program. Routine inspections will include the 14-day inspections. All stormwater related records will be filed and stored by Wavetech for a minimum of three years after each individual site has achieved final stabilization. Copies of this SWMP will be maintained and be readily available upon request.

### **12. Employee Training**

The qualified Stormwater Managers are trained to understand the following as related to the scope of their job duties:

- The permit deadlines associated with installation, maintenance, and removal of storm water controls and with stabilization.
- The location of all stormwater controls on the site required by the permit and how they are to be maintained.
- The proper procedures to follow with respect to the permit's pollution prevention requirements.
- When and how to conduct inspections, record applicable findings, and make corrective action recommendations.

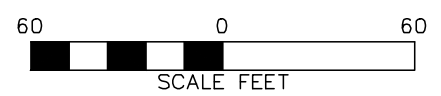
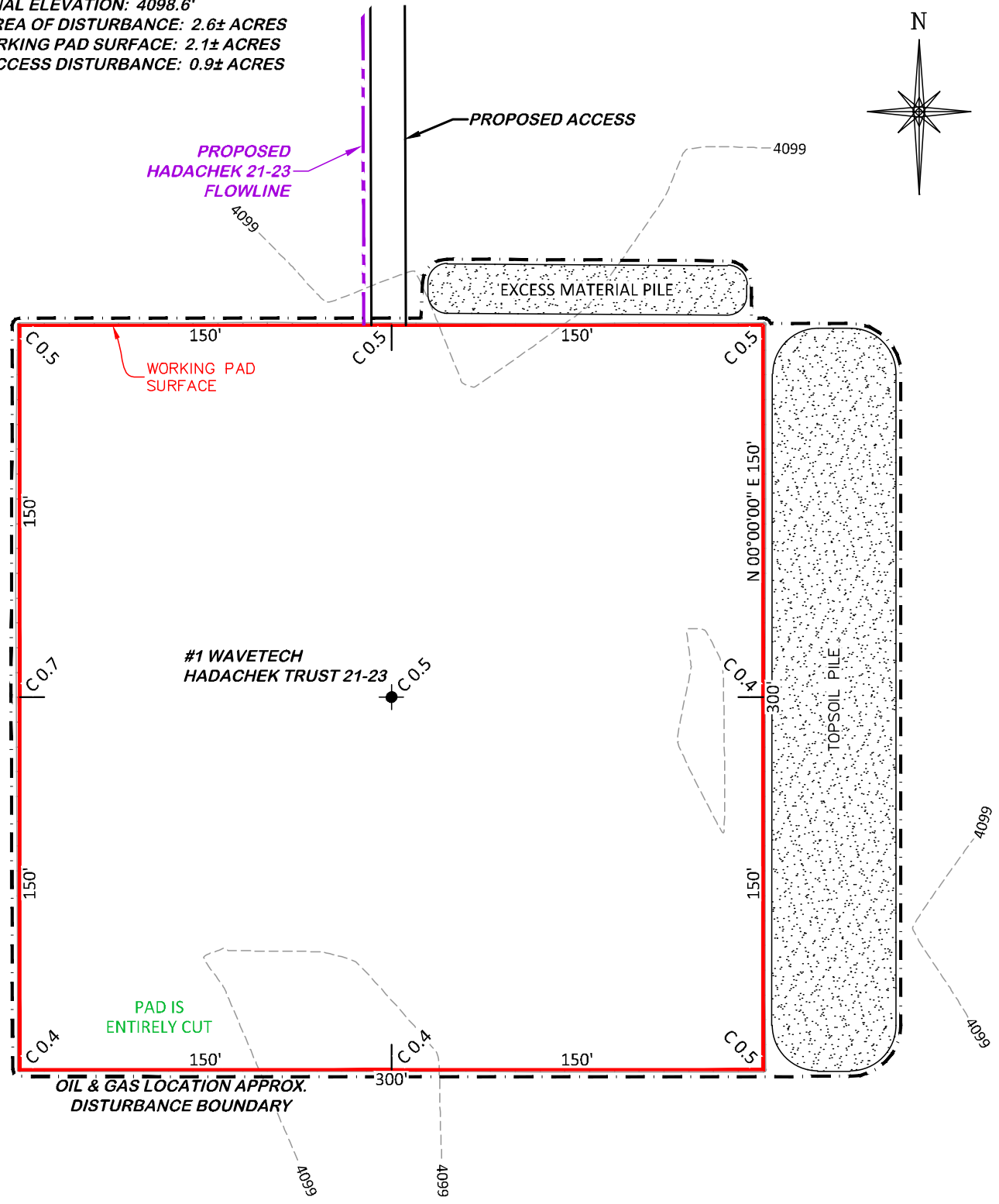
UNGRADED ELEVATION: 4099.1'  
 FINAL ELEVATION: 4098.6'  
 PROPOSED AREA OF DISTURBANCE: 2.6± ACRES  
 AREA OF WORKING PAD SURFACE: 2.1± ACRES  
 PROPOSED ACCESS DISTURBANCE: 0.9± ACRES



A

B

C



**#1 WAVETECH HADACHEK TRUST 21-23**

**DRG** RIFFIN & ASSOCIATES, INC.  
 (307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901

**STORMWATER AND EROSION CONTROL PLAN**  
**WAVETECH HELIUM, INC.**  
**#1 WAVETECH HADACHEK TRUST 21-23**  
**NENW, SECTION 23, T. 13 S., R. 43 W., 6th P.M.,**  
**CHEYENNE COUNTY, COLORADO**

DRAWN: 11/18/22 - DWB/JMB	SCALE: 1" = 60'
REVISED: 9/6/24 - JMB	DRG JOB No. 22302
ECMC REVISIONS	304c(15) BMP