

State of Colorado
Energy & Carbon Management Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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| DE | ET | OE | ES |
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Document Number:

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Date Received:

04/29/2022

SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

| | | | |
|-----------------------|--------------------------|--------------|----------------|
| ECMC Operator Number: | 46290 | Contact Name | Ray Gorka |
| Name of Operator: | KP KAUFFMAN COMPANY INC | Phone: | (303) 8254822 |
| Address: | 1700 LINCOLN ST STE 4550 | Fax: | () |
| City: | DENVER | State: | CO |
| Zip: | 80203 | Email: | rgorka@kpk.com |

FORM 4 SUBMITTED FOR:

Facility Type: WELL

API Number : 05- 005 06973 00 ID Number: 204888

Name: SIERRA-MITCHELL Number: 32-3

Location QtrQtr: NESW Section: 32 Township: 4S Range: 63W Meridian: 6

County: ARAPAHOE Field Name: BOMBING RANGE

Oil & Gas Location(s) and Oil & Gas Development Plan (OGDP) Information

Location(s)

| Location ID | Location Name and Number |
|-------------|-------------------------------|
| 320774 | SIERRA-MITCHELL-64S63W 32NESW |

OGDP(s)

No OGDP

WELL LOCATION CHANGE OR AS-BUILT GPS REPORT

☐ Change of Location for Well *☐ As-Built GPS Location Report☐ As-Built GPS Location Report with Survey

* Well Location Change requires a new Plat.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude Longitude

GPS Quality Value: Type of GPS Quality Value: Measurement Date:

Well Ground Elevation: feet (Required for change of Surface Location.)

WELL LOCATION CHANGE

Well plan is: (Vertical, Directional, Horizontal)

Change of Surface Footage From:

Change of Surface Footage To:

Current Surface Location From QtrQtr NESW Sec 32 Twp 4S Range 63W Meridian 6

New Surface Location To QtrQtr Sec Twp Range Meridian

Change of Top of Productive Zone Footage From:

Change of Top of Productive Zone Footage To:

Current Top of Productive Zone Location Sec Twp Range

New Top of Productive Zone Location Sec Twp Range

**

Change of **Base of Productive Zone** Footage **From:**

Change of **Base of Productive Zone** Footage **To:**

Current **Base of Productive Zone** Location

Sec

Twp

Range

New **Base of Productive Zone** Location

Sec

Twp

Range

Change of **Bottomhole** Footage **From:**

Change of **Bottomhole** Footage **To:**

Current **Bottomhole** Location

Sec

Twp

Range

** attach deviated drilling plan

New **Bottomhole** Location

Sec

Twp

Range

SAFETY SETBACK INFORMATION

Required for change of Surface Location.

Distance from Well to nearest:

Building: Feet
Building Unit: Feet
Public Road: Feet
Above Ground Utility: Feet
Railroad: Feet
Property Line: Feet

INSTRUCTIONS:

- Specify all distances per Rule 308.b.(1).
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit – as defined in 100 Series Rules.

SUBSURFACE MINERAL SETBACKS

Required for change of Top and/or Base of Productive Zone. Enter 5280 for distance greater than 1 mile.

Is this Well within a unit?

If YES:

Enter the minimum distance from the Completed Zone of this Well to the Unit Boundary: Feet

Enter the minimum distance from the Completed Zone of this Well to the Completed Zone of an offset Well within the same unit permitted or completed in the same formation: Feet

If NO:

Enter the minimum distance from the Completed Zone of this Well to the Lease Line of the described lease: Feet

Enter the minimum distance from the Completed Zone of this Well to the Completed Zone of an offset Well producing from the same lease and permitted or completed in the same formation: Feet

Exception Location

☐ If this Well requires the approval of a Rule 401.c Exception Location, enter the Rule or spacing order number and attach the Exception Location Request and Waivers.

LOCATION CHANGE COMMENTS

CHANGE OR ADD OBJECTIVE FORMATION AND/OR SPACING UNIT

| <u>Objective Formation</u> | <u>Formation Code</u> | <u>Spacing Order Number</u> | <u>Unit Acreage</u> | <u>Unit Configuration</u> | <u>Add</u> | <u>Modify</u> | <u>No Change</u> | <u>Delete</u> |
|----------------------------|-----------------------|-----------------------------|---------------------|---------------------------|------------|---------------|------------------|---------------|
| D & J SAND | DJSND | 0 | 80 | E2SW | | | X | |

OTHER

☐ RULE 502 VARIANCE

Order Number: _____

Description: _____

☐ REMOVE FROM SURFACE BOND Signed surface use agreement is a required attachment

☐ CHANGE NAME OR NUMBER OF WELL, FACILITY, OIL & GAS LOCATION, OR OGD

From: Name SIERRA-MITCHELL Number 32-3 Effective Date: _____

To: Name Number _____

☐ ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.

☐ WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number _____ has not been drilled.

☐ PIT: Abandon Earthen Pit Permit (Form 15) – ECMC Pit Facility ID Number _____ has not been constructed (Permitted and constructed pit requires closure per Rule 911)

☐ CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number _____ has not been constructed (Constructed facility requires closure per Rule 907)

OIL & GAS LOCATION ID Number: _____

☐ Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

☐ Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.

☐ REQUEST FOR WELL RECORDS CONFIDENTIALITY (Rule 206.c.(1))

☐ DIGITAL WELL LOG UPLOAD

☐ DOCUMENTS SUBMITTED Purpose of Submission: _____

☐ COMPLIANCE with CONDITION OF APPROVAL (COA) on Form NO: _____ Document Number: _____

RECLAMATION

INTERIM RECLAMATION

☐ Interim Reclamation will commence approximately _____

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Interim reclamation complete, site ready for inspection.
Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

Field inspection will be conducted to document Rule 1003.e. compliance

FINAL RECLAMATION

☐ Final Reclamation will commence approximately _____

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

Field inspection will be conducted to document Rule 1004.c. compliance

Comments:

ENGINEERING AND ENVIRONMENTAL WORK

☐ NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below, as required by Rule 434.b.(3).

Date well temporarily abandoned _____

Has Production Equipment been removed from site? _____

Mechanical Integrity Test (MIT) required. Date of last MIT _____

TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

☒ NOTICE OF INTENT/REQUEST FOR APPROVAL Approximate Start Date 01/14/2022

☐ SUBSEQUENT REPORT Date of Activity _____

- | | | |
|---|---|--|
| <input type="checkbox"/> Bradenhead Plan | <input checked="" type="checkbox"/> Venting or Flaring (Rule 903) | <input type="checkbox"/> E&P Waste Mangement |
| <input type="checkbox"/> Change Drilling Plan | <input type="checkbox"/> Repair Well | <input type="checkbox"/> Beneficial Reuse of E&P Waste |
| <input type="checkbox"/> Gross Interval Change | | |
| <input type="checkbox"/> Underground Injection Control | | |
| <input type="checkbox"/> Request approval of Reuse and Recycling Plan per Rule 905.a.(3). (Reuse and Recycling Plan must be attached.) | | |
| <input type="checkbox"/> Request approval of Alternative Sampling Plan per Rule 909.j.(6). for this Pit. (Alternative Sampling Program must be attached.) | | |
| <input type="checkbox"/> Other | | |

☐ Request that an existing produced water sample from the same formation be used per Rule 909.j.(6) to meet the requirements of Rule 909.j.(1)-(5) for this Well.

Pit ID _____ Pit Name _____

(No Sample Provided)

☐ Subsequent well operations with heavy equipment (Rule 312)

(No Well Provided)

COMMENTS:

This location was connected to a gathering system that was permanently abandoned by the third-party gathering company.

GAS CAPTURE

VENTING AND FLARING:

Operation type: Flaring Operational phase requiring venting/flaring: Production

Reason for venting/flaring: Gathering Line Not Accessible

Describe Other reason for venting/flaring:

The SIERRA-MITCHELL 32-3 location is neither venting nor flaring gas, all gas is used on site and any residual gas is routed to an approved combustion device after separation.

Describe why venting or flaring is necessary. If reporting per Rule 903.b.(2), 903.c.(3).C, or 903.d.(2), include the explanation, rationale, and cause of the event:

This location was connected to a gathering system that was permanently abandoned by the third-party gathering company. Natural gas production is minimal. KP KAUFFMAN COMPANY INC is first utilizing the produced natural gas to run production

equipment onsite.

KP KAUFFMAN COMPANY INC., SIERRA-MITCHELL 32-3's produced gas is processed through an adequately sized separator, combustion of tank vapor after adequate separation is authorized by CDPHE-APCD.
This location has an APEN with CDPHE, AIRS ID 005-1619.

Describe how the operation will protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. If reporting per Rule 903.d.(2), include BMPs used to minimize venting on the BMP Tab:

The SIERRA-MITCHELL 32-3 produces insufficient saleable quantity or quality gas to make such a long lateral pipeline to connect to a gas gathering system feasible or practicable. The nearest gas gathering line is approximately 1.5 miles away. Natural gas is utilized onsite to run production equipment. It is not vented.

Total volume of gas vented or flared: 0 mcf ☐ estimated ☒ measured

Total duration of emission event: 24 hours ☐ consecutive ☒ cumulative

Submit a single representative gas analysis via Form 43 to create a Sample Site Facility ID# for this Location. Reference the Form 43 document number on the Related Forms tab.

Sample Site Facility ID#: _____

GAS CAPTURE PLAN

Describe the plan to connect to a gathering line or beneficially use the gas; include anticipated timeline:

For the reasons stated above, connection to a gathering line is not feasible. The minimal natural gas produced is beneficially used onsite to run production equipment.

A Gas Capture Plan that meets the requirements of Rule 903.e is attached. ☒

CASING PROGRAM

(No Casing Provided)

POTENTIAL FLOW AND CONFINING FORMATIONS

H2S REPORTING

☐ Intentional release of H2S gas due to Upset Condition or malfunction.

☐ Intent to temporarily abandon well with potential H2S concentration >100 ppm.

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

Gas Analysis Report must be attached.

H2S Concentration: _____ in ppm (parts per million)

Date of Measurement or Sample Collection _____

Description of Sample Point:

Absolute Open Flow Potential _____ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: _____

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: _____

COMMENTS:

OIL & GAS LOCATION UPDATES

OGDP ID _____ OGD Name _____

SITE EQUIPMENT LIST UPDATES

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

| | | | | |
|----------------------------|---------------------------|-----------------------------|-----------------------|------------------------------------|
| Wells _____ | Oil Tanks _____ | Condensate Tanks _____ | Water Tanks _____ | Buried Produced Water Vaults _____ |
| Drilling Pits _____ | Production Pits _____ | Special Purpose Pits _____ | Multi-Well Pits _____ | Modular Large Volume Tank _____ |
| Pump Jacks _____ | Separators _____ | Injection Pumps _____ | Heater-Treaters _____ | Gas Compressors _____ |
| Gas or Diesel Motors _____ | Electric Motors _____ | Electric Generators _____ | Fuel Tanks _____ | LACT Unit _____ |
| Dehydrator Units _____ | Vapor Recovery Unit _____ | VOC Combustor _____ | Flare _____ | Enclosed Combustion Devices _____ |
| Meter/Sales Building _____ | Pigging Station _____ | Vapor Recovery Towers _____ | | |

OTHER PERMANENT EQUIPMENT UPDATES

OTHER TEMPORARY EQUIPMENT UPDATES

CULTURAL AND SAFETY SETBACK UPDATES

OTHER LOCATION CHANGES AND UPDATES

Provide a description of other changes or updates to technical information for this Location:

POTENTIAL OGD UPDATES

PROPOSED CHANGES TO AN APPROVED OGD

☐ This Sundry Form 4 is being submitted pursuant to Rule 301.c to propose changes to an approved Oil and Gas Development Plan.

Check all boxes that pertain to the type(s) of changes being proposed for this OGD:

- ☐ Add Oil and Gas Location(s)
- ☐ Add Drilling and Spacing Unit(s)
- ☐ Amend Oil and Gas Location(s)
- ☐ Amend Drilling and Spacing Unit(s)
- ☐ Remove Oil and Gas Location(s)
- ☐ Remove Drilling and Spacing Unit(s)
- ☐ Oil and Gas Location attachment or plan updates
- ☐ Amend the lands subject to the OGD
- ☐ Other

Provide a detailed description of the changes being proposed for this OGD. Attach supporting documentation such as maps if necessary.

Best Management Practices

| No | BMP/COA Type | Description |
|----|--------------|-------------|
| | | |

Operator Comments:

Denied 06/03/2024 The Sierra Mitchell wells are all drilled in the same field and formation and are located within 1 mile of each other. Attached is a representative gas sample for the wells.

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

Signed: _____ Print Name: Ray Gorka
Title: Dir. Enviro. Compli. Email: rgorka@kpk.com Date: 4/29/2022

Based on the information provided herein, this Sundry Notice (Form 4) complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY LIST

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

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|--------------------------|--|----------------------------|
| Engineer | This form is denied due to insufficiency of Gas Capture Plan details, see attached pdf. The well needs to be shut in until there is an approved Gas Capture Plan or variance. | 06/03/2024 |
| Engineer | This well requires a Gas Capture Plan including gas analysis that includes hydrogen sulfide; details how the gas is now being utilized on site; alternative uses for the gas; what controls are in place for upset conditions; CDPHE approvals. Details of how gas is metered shall be included. Until this well has an approved Gas Capture Plan and its CDPHE permissions documented it is to be shut in and conserved. Form 10 for gatherers needs to be updated and remove any invalid data. | 06/03/2024 |
| Engineer | Reported gas volumes inconsistent with full month reporting - volumes to be metered; once used onsite only produced volumes not indicated; if gatherer is no longer going to be gatherer update via F10; use onsite not documented prior to loss of gatherer, qtys used and for what onsite - request should be prior approval. | 06/03/2024 |
| Permit | This form is being returned to draft for the addition of the new Gas Capture tab. For Rule 903, operator must check the "Venting or Flaring (Rule 903)" box on the Engineering/Environmental tab to activate the Gas Capture tab. To submit a Gas Capture Plan, check the box at the bottom of the Gas Capture tab "A Gas Capture Plan that meets the requirements of Rule 903.e is attached", and attach the Plan to the Form 4. Do not check the "Documents Submitted" box on the OTHER tab to submit a GC Plan. | 02/25/2022 |

Total: 4 comment(s)

ATTACHMENT LIST

| <u>Att Doc Num</u> | <u>Name</u> |
|---------------------------|-------------------------------------|
| 402927738 | SUNDRY NOTICE DENIAL-OBJ-VENT_FLARE |
| 402927746 | GAS ANALYSIS REPORT |
| 403031771 | GAS CAPTURE PLAN |
| 403988934 | FORM 4 SUBMITTED |

Total Attach: 4 Files