

| Laramie Energy 2024 CCR 0994-23-02 | Required? | Issues identified | Suggested corrections: | Specific Rules (optional) | Referenced in guidance document? | Status | Applicant Response | Response Acceptable? | 403910896 |
|--|--|---|---|---------------------------|----------------------------------|---------------------------|---|----------------------|-----------|
| 304.c.(1). Emergency Spill Response Program | Within 2640' of GUD/or relevant surface water | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(2). Noise Mitigation Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(3). Light Mitigation Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(4). Odor Mitigation Plan | Within 2000' of BU | The BMPs listed do not adequately protect the nearby RBUs from possible Odor. | Add BMP for daily removal of drill cuttings or closed storage containers for oil based mud if used. | | | okay to pass completeness | Laramie has committed to the following BMP: • Cuttings storage time on location will be minimized prior to transport to an approved disposal facility. • Cuttings are hauled off Location daily, except Sundays when the approved disposal facility is closed. o The dried cuttings with only trace drilling fluid will not have an odor because of the use of Group III base oil. If odors from dried cuttings on location become noticeable, an odor neutralizing agent will be applied as a contingency to treat the residual fluid on cuttings (but only applied if necessary). These BMPs are listed in the revised CCR Odor Plan. | Yes | X |
| 304.c.(4). Odor Mitigation Plan | Within 2000' of BU | The Odor Plan states that Group III Mud will be used if available, but this is not included in the BMP list. Does Laramie expect difficulty in acquiring Group III Mud for use at this site? The Odor Plan states "Tank emissions will be controlled with an enclosed combustion device at least until VOC emissions drop below 2 tons per year. Enclosed combustion devices will have auto igniters installed and inspected at least weekly for proper operation", however the preliminary process Flow Diagram does not show any connections to the sales lines. Why is this gas being flared rather than being sent to the sales lines and what will be done once the VOC emissions drop below 2 tons per year? | Update to include in BMP list. | | | okay to pass completeness | Laramie commits to Group III mud. Any reference to Group I has been removed from the Odor Plan. Laramie added Group III mud as a BMP in the Odor Plan. Laramie will comply with CDPHE regulations which currently require controlling tanks down to 2tpy. This is accomplished with an enclosed combustion device as listed in the CCR Preliminary Process Flow Diagram. Tank emissions on the West Slope are not sent to sales for several reasons. VRUs (similar to those used on the Front Range) are not effective on small production tank batteries for natural gas operations on the Western Slope and generate their own emissions to run the equipment, making these units less environmentally friendly. The bullet list in Section 5 is a BMP list. Laramie has added the statement "Laramie will utilize the following Best Management Practices to control odors during production operations" to Section 5 of the Odor Plan. | Yes | X |
| 304.c.(4). Odor Mitigation Plan | Within 2000' of BU | Section 5. Production does not have a list of BMPs like the other sections, are the bulleted items a list of BMPs? | Update to clarify whether the bulleted list is a list of BMPs. If it is not add BMPs related to production. | | | okay to pass completeness | | Yes | X |
| 304.c.(5). Dust Mitigation Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(6). Transportation Plan | If RLG requires or Dir requests | Not applicable. | | | | NA | | | X |
| 304.c.(7). Operations Safety Management Program | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(8). Emergency Response Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(9). Flood Shut-In Plan | Within floodplain | Not applicable. | | | | NA | | | X |
| 304.c.(10). Hydrogen Sulfide Drilling Operations Plan | Within known H2S zones | Not applicable. | | | | NA | | | X |
| 304.c.(11). Waste Management Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(12). Gas Capture Plan | If not committed to connect to gathering system | Not applicable. | | | | NA | | | X |
| 304.c.(13). Fluid Leak Detection Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(14). Topsoil Protection Plan | ALWAYS | The Topsoil Stockpile volume listed in the Topsoil Protection Plan does not match the volume of topsoil listed on the Layout Drawings. | Update to be consistent. | | | okay to pass completeness | The Topsoil Protection Plan has been revised to reflect the topsoil volumes on the CCR Layout Drawing. The revised Topsoil Protection Plan is attached to the Form 2A. | Yes | X |
| 304.c.(15). Stormwater Management Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(16). Interim Reclamation Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(17). Wildlife Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(18). Water Plan | ALWAYS | No description of planned recycled water use is included in the Water Plan. Per Rule 304.c.(18).C. & D. the use of recycled water should be described if recycled water is planned to be used and if it is not planned to be used a description of why should be included in the Water Plan. | Update to include details about recycled water use plans. | | | okay to pass completeness | The Water Plan has been revised to include a description on why recycled water is not used for CCR development (Section 7 of the CCR Water Plan). The revised Water Plan is attached to the Form 2A. | Yes | X |
| 304.c.(19). Cumulative Impacts Plan | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(20). Community Outreach Plan | Within 2000' of DIC BU | No issues identified. | | | | okay to pass completeness | | | X |
| 304.c.(21). Geologic Hazard Plan | Within 1 mile of hazard | No issues identified. | | | | okay to pass completeness | | | X |

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|--|---------------------------------------|--|---|---------------------------|----------------------------------|---------------------------|--|----------------------|-----------|
| 304.b.(7).F. ACCESS ROAD MAP | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(2). ALA DATASHEET | If Loc meets ALA criteria | The ALA Datasheet states that the two RBU owners have signed Informed Consent but does not describe the status of the Tenants Informed Consent. | Update to describe whether the Tenant has signed Informed Consent. | | | okay to pass completeness | The ALA Datasheet has been revised to reflect that Informed Consent has been signed by all RBU Owners and tenant within 2,000 feet. The revised ALA Data Sheet is attached to the Form 2A. | Yes | X |
| 304.b.(2). ALA NARRATIVE SUMMARY | If Loc meets ALA criteria | The ALA Narrative states that the Tenants have agreed to sign the Informed Consent but at the time of submission had not yet signed Informed Consent. Per Rule 604.b.(1) all Tenants and RBU Owners are required to sign Informed Consent. | Update to describe whether submission meets Rule 604.b.(1). | | | okay to pass completeness | Laramie has obtained signed Informed Consent from all RBU Owners & Tenant within 2,000 feet of the CCR WPS. The ALA Narrative has been revised to reflect compliance with Rule 604.b.(1). The revised ALA Narrative Summary is attached to the Form 2A. | Yes | X |
| No Rule requirement. CONSULTATION SUMMARY | If pre-app mtg | No issues identified. | | | | okay to pass completeness | | | X |
| No Rule requirement. CPW CONSULTATION | If pre-app mtg | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(3). CULTURAL FEATURES MAP | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).H. DIRECTIONAL WELL FLAT | If any directional wells | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).J. DISPROPORTIONATELY IMPACTED COMMUNITY MAP | Within 2000' of DIC BU/HOBU | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).I. GEOLOGIC HAZARD MAP | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(8). GIS data | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).E. HYDROLOGY MAP | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 604.b.(1). INFORMED CONSENT LETTER | within 2000' of RBU/HOBU | Based on the information provided in the ALA Narrative this attachment does not include Informed Consent from the Tenants of one of the RBUs within 2000'. | Update with Informed Consent from RBU Tenants. | | | okay to pass completeness | Laramie has obtained Informed Consent from all RBU Owners & Tenants within 2,300 ft of the CCR WPS. Seven Signed Informed Consent are attached to the Form 2A. | Yes | X |
| 304.b.(7).B. LAYOUT DRAWING | ALWAYS | The Topsoil Stockpile volume listed in the Topsoil Protection Plan does not match the volume of topsoil listed on the Layout Drawings. | Update to be consistent. | | | okay to pass completeness | The Topsoil Protection Plan has been revised to reflect the correct topsoil volume which is shown on the Layout Drawings. | Yes | X |
| 304.b.(7).B. LAYOUT DRAWING | ALWAYS | Topsoil stockpile volume is not listed for the Completions and Production Layout Drawings. | Include Topsoil stockpile volumes for the Completions and Production Layout Drawings. | | | okay to pass completeness | The CCR Layout Drawings have been revised to show topsoil volumes on applicable drawings. | Yes | X |
| 304.b.(7).B. LAYOUT DRAWING | ALWAYS | All Tanks shown on the Layout Drawings should include volumes. | Update to include Tank Volumes | | | okay to pass completeness | Layout Drawings have been revised to list Production Tanks volumes (Sheet 9.01 & 9.02) are shown in a table format in the right column. | Yes | X |
| 304.d. LESSER IMPACT AREA EXEMPTION REQUEST | if asking to not submit required info | Not applicable. | | | | NA | | | X |
| 303.a.(6).B. LOCAL/FED FINAL PERMIT DECISION | if permit approved | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).A. LOCATION DRAWING | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(4). LOCATION PICTURES | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(10). NRCS MAP UNIT DESC | ALWAYS | No issues identified. | | | | okay to pass completeness | | | X |
| No Rule requirement. OTHER | optional | No issues identified. | | | | okay to pass completeness | | | X |
| 304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS | ALWAYS | Preliminary Process Flow Diagram lists Condensate Tank but Form 2A does not list a Condensate Tank. Was this supposed to be the Oil Tank? | Update to accurately show equipment. | | | okay to pass completeness | The Preliminary Process Flow Diagram has been revised to show "Oil Tank". The reference to "Condensate Tank" has been removed. The revised PPFD is attached to the Form 2A. | Yes | X |
| 304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS | ALWAYS | The Process Flow Diagram does not show a way to return gas from the Tank Vent Gas KO Pot back to the sales gas line. Is there a reason that this only allows for combusting excess gas? Flaring or combusting gasses are not allowed unless one of the conditions listed in 903.d.(1) are met. | | | | okay to pass completeness | ECMC Rule 903.d(1) Emissions During Production is not applicable in this situation. "After the Commencement of Production Operations at an Oil and Gas Location, Venting or Flaring of natural gas produced from any Completed Well is prohibited..." The attached Preliminary Process Flow Diagram does not display venting or flaring of natural gas from a well; rather, shows the regulated venting of tank vapors from production tanks which comply with current CDPHE regulations. All saleable gas will be routed to a sales line. | Yes | X |

| | | | | | | | |
|---|-------------------------------|---|---|---------------------------|---|-----|---|
| 304.b.(9).B.i. REFERENCE AREA MAP | if non-crop | The entire Map area should include a basemap, either aerial or topographic imagery. Only a small portion of the Map currently has a basemap other than roads. | Update to include full basemap imagery. | okay to pass completeness | The Reference Area Map has been revised to show aerial imagery background for the entire map. The revised Reference Area Map is attached to the Form 2A. | Yes | X |
| 304.b.(9).B.ii. REFERENCE AREA PICTURES | if non-crop | The "Reference Area From Above" is not representative of the area and should be taken from a height that allows for an overview of the entire area, not a closeup of the ground surface. We recommend this be taken from a drone, but if that is not feasible a ladder can be used. | Update to include a proper Reference Photo from above the Reference Area. | okay to pass completeness | The Reference Area Pictures have been revised to include a drone photo in addition to the close-up "Reference Area from Above". The revised Reference Area Pictures is attached to the Form 2A. | Yes | X |
| 304.b.(7).G. RELATED LOCATION AND FLOWLINE MAP | ALWAYS | Missing attachment | Attach missing Related Location and Flowline Map | okay to pass completeness | The CCR OGD Related Location & Flowline Map is now attached to the Form 2A. | Yes | X |
| 304.b.(12).B. SURFACE AGRMT/SUR ETY | if exists or req'd | No issues identified. | | okay to pass completeness | | | X |
| 604.a.(4). WAIVERS | within 500' of RBU and no SUA | Not applicable. | | NA | | | X |
| 304.b.(7).C. WILDLIFE HABITAT DRAWING | ALWAYS | No issues identified. | | okay to pass completeness | | | X |
| No Rule requirement. [any other doc the operator attached] | Optional | No issues identified. | | okay to pass completeness | | | X |

| Laramie Energy 2024 CCR 0994-23-02 | Issues identified: (insert a new row for each 2A tab issue) | Suggested corrections: | Specific Rules (optional) | Referenced in guidance document? | Status | Applicant Response | Response Acceptable? | 403910896 |
|--|--|--|---------------------------|----------------------------------|---------------------------|--|----------------------|-----------|
| Cultural & Safety Setbacks | The ALA Datasheet states that "The two (2) RBUs within 2,000 feet have signed Informed Consent.", however the Form 2A states "Informed Consent received from (1) RBU. 2nd RBU is greater than 2000' from equipment listed in Rule 604.b.(3). The RBU which falls under Rule 604.b(3) has tenants. The RBU Owners have signed Informed Consent". Since 604.b.(3) only applies when all RBUs are located more than 2000' from Wells and Equipment it does not apply for this location. All RBU owners and Tenants are required to have signed informed Consent per Rule 604.b.(1). | Update to remove 604.b.(3), as it does not apply to this location and update description to describe Informed Consent. Additionally update Operator Comment to accurately reflect this change. | | | okay to pass completeness | The Form 2A has been updated to reflect that all RBU Owners & tenants within 2,000 feet of the CCR WPS have signed Informed Consent. Seven Informed Consents are attached to the Form 2A. This includes RBU Owners & Tentants within 2,300 feet of CCR WPS. | Yes | X |
| Location ID & Local Govt Info | There is no plugging, abandonment, and Reclamation Financial Assurance listed. | Update to include proper Financial Assurance information. | | | okay to pass completeness | The Form 2A has been updated to include Plugging, Abandment, & Reclamation bond # 20210135 | Yes | X |

Laramie Energy 2024 CCR 0994-23-02

OGDP Scale Data

| Issues identified | Suggested corrections: | Specific Rules (optional) | Referenced in guidance document? | Status | Applicant Response | Response Acceptable? | 403918656 |
|--|------------------------|---------------------------|----------------------------------|---------------------------|--|----------------------|-----------|
| The Form 2B lists 0.8 acres of pipeline disturbance during Construction, but zero pipeline disturbance post-interim reclamation. Midstream lines should not be included as part of the disturbance as the ECOM does not regulate midstream pipelines. If one or both of the pipelines are owned and operated by Laramie then this can be ignored. If this is changed all associated Form 2A attachments and plan references to pipeline and total disturbance will need to be updated. | | | | okay to pass completeness | Laramie is the owner and operator of the proposed pipeline segment which will result in 0.8 acres of disturbance. No changes required. | Yes | X |

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02

| Issues identified: | Suggested corrections: | Specific Rules (optional) | Referenced in guidance document? | Status | 403918656 |
|-----------------------|------------------------|---------------------------|----------------------------------|---------------------------|-----------|
| No issues identified. | | | | okay to pass completeness | X |

Hearing Application

| COMPLETENESS REVIEW | | Docket# 241000238 | |
|---|--|---|---------------------|
| Attorney Name: KELSEY WASYLENKY; JAMIE JOST Attorney Email Address: KWASYLENKY@JOSTENERGYLAW.COM; JJOST@JOSTENERGYLAW.COM Permitter Name: Ginger Malasauskas Permitter Email: ginger.malasauskas@state.co.us Engineer Name: Curtis Haverkamp Engineer Email: curtis.haverkamp@state.co.us Hearing Officer Name: Stephen Smeltz Hearing Officer Email: stephen.smeltz@state.co.us | | | |
| Issue identified by staff: | Suggested correction: | Explanation: | SME reviewer |
| <i>LAS Review Notes</i> | | | |
| Paragraph 2 (OGDP & Spacing Applications) and Exhibit A Map (and Exhibit C Map): surface location acreage conflicts with the construction acreage on the Form 2A. | One of the following should be revised: Form 2A - 10.2 acres Hearing Application - 7.5 acres | | |
| <i>Permitting Review Notes</i> | | | |
| None. | None. | TOPIC There were no Permitting Review issues identified in the hearing application at this time. | |
| <i>Geologic Testimony</i> | | | |
| None. | None. | There were no Review issues identified in the Geologic Testimony at this time. | |
| <i>Engineering Testimony</i> | | | |
| No concerns. | | ACCEPTABLE OVERALL | Engineering |

Applicant Response:

corrected 3/18/2025
 Form 2A has been revised to reflect the O&G Location construction acres of 7.5 acres. The Hearing Application does not require revision.