

CCR 0994-23-02 Well Pad

Emergency Spill Response Program Plan ECMC Rule 304.c.(1)



**Laramie Energy, LLC
3199 D Rd. Bldg A2
Grand Junction, CO 81504**

CCR 0994-23-02 Well Pad Emergency Spill Response Program Plan ECMC Rule 304.c.(1)



1. INTRODUCTION – ECMC RULE 304.c.(1)

The CCR 0994-23-02 Emergency Spill Response Program Plan was prepared in accordance with the Colorado Energy and Carbon Management Commission’s (referred to hereinafter as ECMC or the Commission) Rule 304.c.(1) Emergency Spill Response Program Plan and with applicable requirements of ECMC Rule 411.a(4), Rule 602.j., and Rule 912.b(1).

2. SITE DESCRIPTION – CCR 0994-23-02 WELL PAD

Laramie Energy, LLC (Laramie) (Operator # 10433) is pursuing a Form 2A for an Oil and Gas Location Assessment permit in Mesa County, Colorado. The CCR (Colorado Canyon Ranch) 0994-23-02 well pad (CCR Pad) is a proposed, new location. Laramie is proposing to drill two (2) new horizontal wells at the CCR Pad in Section 23 of Township 9 South, Range 94 West, 6th P.M. The CCR Pad will develop fee and federal minerals. The CCR Pad is adjacent to existing infrastructure, reducing surface disturbance proposed in the 2024 CCR 0994-23-02 Oil and Gas Development Plan (OGDP).

OGDP Title: 2024 CCR 0994-23-02 OGD

Location Name: CCR 0994-23-02

Location ID: New Location

Legal Description: NWNE of Section 23, Township 9 South, Range 94 West, 6th P.M.

Location Coordinates: Latitude: 39.268132°; Longitude: -107.847692°

Elevation: 7142 feet

County: Mesa

General Location: 6 mapped miles east of Collbran, Colorado.

Zone District: Agricultural, Forestry, Transitional District (AFT)

Surface Owner: Colorado Canyon Ranch LLC

Nearest Public Crossroads: HWY 330 & 64 3-10 Road (Mesa County Public Roads)

The parcel is located 6 mapped miles east of Collbran, Colorado. The well pad is located 6.5 access (travel) miles east of Collbran, Colorado. The CCR Pad is located approximately 1,560 feet southeast (mapped distance) from the nearest public road, 64 3/10 Road (also known as Brush Creek Road).

If approved, the proposed well pad will be constructed to create an approximate 4.3 acre Working Pad Surface (WPS) to accommodate drilling equipment, piping, a truck/equipment turn-around location, and facilities for two (2) horizontal gas wells developing fee and federal minerals. The Area of Disturbance for the CCR Pad well pad, including cut and fill slopes and soil stockpiles, will be approximately 7.5 acres. Acreage disturbance for the project is detailed in **Table 1**. The total disturbance for the project will be 10.2 acres, including the well pad, access road, and buried pipeline segment.

Interim reclamation will begin after all wells are drilled and completed as planned with production facilities installed at the CCR Pad. During interim reclamation, the cut and fill slopes will be reshaped and contoured, reclaiming approximately 5.2 acres. The Production

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Pad Surface (long-term well pad disturbance) will be 2.3 acres. The total long-term disturbance associated with this pad and access road will be 4.1 acres

Table 1. Disturbance Acreage

Well Pad		Disturbance in Acres
Area of Disturbance		7.5
Working Pad Surface		4.3
Area to be Interim Reclaimed		5.2
Production Pad Surface (after Interim Reclamation)		2.3
Access Road		Disturbance in Acres
Proposed Access Road Acreage (2,542 feet length)		1.9
Pipeline		Disturbance in Acres
Proposed Pipeline (703 feet length)		0.8
Disturbance Totals - Acres		
TOTAL DISTURBANCE	Short-term	Long-term
10.2	6.0	4.2

Operations will be conducted in the following phases at the CCR Pad: construction, production equipment installation, drill rig mobilization, drilling, completions and flowback (including equipment mobilization, staging, and demobilization), production, interim reclamation, inspections, and final grading/reclamation of the site. Inspection activities will occur during the lifespan of the site. Laramie anticipates that the well pad will remain in production for approximately 30 years, based on the average lifespan of wells within the area. **Table 2** details the anticipated timeframe for each operational phase. Laramie anticipates continuous drilling, completions, and flowback operations in order to reduce the number of pre-production days needed to develop the proposed two (2) wells.

Table 2. Timeframe for Operational Phases

Phase/Activity /Stage	Timeframe (Days)
Construction	50
Production Equipment Installation	30
Drilling Mobilization	7
Drilling	46
Drilling Demobilization	7
Completions Mobilization	10
Completions and Flowback	48
Completions Demobilization	10
Interim Reclamation	14
Total Pre-Production Timeframe	222
Production	Up to 30 years
Inspection Activities	Will Occur During All Phases

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3. DRILLING AND COMPLETION FLUIDS

Preliminary pre-production equipment proposed for the CCR Pad is detailed in **Table 3**. Equipment for each operational phase (drilling, completions, and flowback) is preliminary and subject to change due to equipment availability and scheduling.

Table 3. Fluids and Circulating System

Equipment	Description	Number of Units	Total Capacity (Barrels)
Upright tanks for Freshwater storage	400 barrel each - Upright tanks for freshwater storage	3	1200
Upright Tanks for Mud Storage	400 barrel each - Upright tanks for mud storage	7	2800
Rig Mud pits (active capacity)	Active volume during drilling operations.	3	1200
Rig Trip tanks	40-barrel trip tanks used during tripping or slug operations	2	80
Mud shack	skids to store all mud products	2	
Rig diesel tank	400-barrel diesel tank during drilling	1	400
Mud pumps		3	
Generators		4	
Cutting Management Area	(2) High Wall 3-sided tanks/bins are utilized for the storage of drill cuttings generated on-site, pending their subsequent removal to an off-site location.	2	125 cubic yards
Closed Loop Solids Control Equipment	Centrifuge, de-watering unit, and drying shakers.		120
Frac Tanks	Capacity of each frac tank is 500 barrels	64	32,000
Frac Pump (diesel)	Frac Pump - 230-gallon capacity	20	4,600 gallons
Charge Pump / Blender	100-gallon capacity	2	200 gallons

Drilling facilities (pre-production) typically operate in accordance with the controls specified in facility specific SPCC Plan provided by the drilling and completions operators.

4. TEMPORARY SURFACE LINES

During drilling and completions, Laramie will utilize temporary HDPE (high-density polyethylene) or lay flat style dedicated freshwater surface water lines to transfer freshwater from Buzzard Creek to the CCR Pad. Equipment will be situated on a Mesa County right-of-way (ROW) that was previously a section of Mesa County 34 3/10 Road (Brush Creek Road) until Mesa County built a bridge and abandoned that section of the ROW. Laramie has communicated with Mesa County and the Surface Owner regarding the placement of equipment and temporary lines. Further, Laramie has consulted with Colorado Parks & Wildlife (CPW) and Ute Water Conservancy District (Public Water Systems entity) regarding the fresh water take-out and utilization of freshwater.

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Temporary surface water lines will be laid on privately owned surface. Some sections of the temporary lines will be placed on an existing pipeline ROW. No surface disturbance will result from the placement of the temporary surface water lines. These lines will be removed following completions and flowback operations. Prior to being placed in service, temporary surface water lines will be pressure tested. During use, temporary surface lines will be inspected daily with operators checking pressure gauges frequently. Temporary lines will be drained of liquids when not in use. Best Management Practices (BMPs) were discussed with CPW and Ute Water Conservancy District regarding fresh water take out. These BMPs are listed are listed **Section 12**.

To ensure that there is no risk of water flowing backward (reverse flow of water) into Buzzard Creek through the dedicated fresh water surface lines, the lines transferring water from Buzzard Creek to the well pad tanks will discharge into a dedicated fresh water receiving tank. The discharge section of the fresh water pipes will be installed above the top of the receiving tank which will prevent the reverse flow of liquids. The surface link will terminate above the receiving tank (as depicted in **Figure 1**.) so even in the unlikely event of an overflow of the receiving tank, no water could enter the surface pipelines.

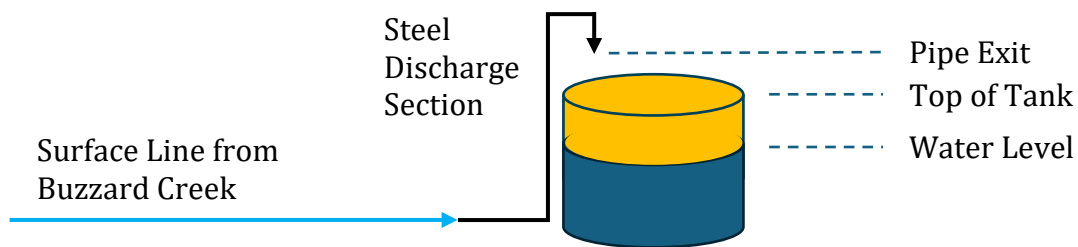


Figure 1. Fresh Water Line Discharge Arrangement

5. PRODUCTION FLUIDS

Five (5) production tanks are planned for the well pad. The tanks will be 400 barrels each, with a total capacity of 2,000 barrels for Location. All production equipment will be located on the “cut” portion of pad. Each tank will be located more than 3 feet apart in accordance with ECMC Rule 608.a.(2).A. Installed tanks will be connected to combustors and will not be vented. Laramie will label all tanks on the subject pad to comply with ECMC Rule 605.h. and Rule 608.a.(12).

Table 4. Proposed Production Tanks

Oil Tanks		Produced Water Tanks		Gunbarrel Tanks		Sand Tank	
# Of Tanks	Barrels	# Of Tanks	Barrels	# Of Tanks	Barrels	# Of Tanks	Barrels
1	400	2	800	1	400	1	400

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Tanks will be installed within secondary containment, in accordance with ECMC Rule 603.o.(1). Secondary containment will be sized to contain 150 percent of the volume of the largest tank. All proposed tanks have a capacity of 400 barrels. The capacity for secondary containment, therefore, will be sized to contain a minimum of 600 barrels at the CCR Pad. The containment will be constructed of metal wall and spray-in liner. Spray-in liners are more durable and have a longer lifespan than HDPE liners.

During production, four (4) 330-gallon chemical storage units with secondary containment will be located on the Production Pad Surface. Two (2) of the chemical storage units will consist of corrosion/scale inhibitor, wetting agent, and H₂S scavenger. The other two (2) portable chemical storage units will be a methanol tote with injection pump. The total capacity of these chemical storage units will be 1,320 gallons for the CCR Pad. Each portable chemical storage unit is outfitted with a secondary containment feature which is adequate for the size of the storage tank to prevent discharges.

6. APPLICABILITY – ECMC RULE 411.a(4).A.

The proposed CCR Pad is located 14.79 stream miles from the Ute Water Conservancy District (Ute Water) Public Water Systems (PWS) intake buffer (**Appendix A**). Ute Water's PWS intake is located along Plateau Creek, which is downgradient from CCR Pad via Buzzard Creek.

Buzzard Creek, a perennial stream, is located downgradient 578 feet north at the nearest point. Dense vegetation comprised of oakbrush, mountain shrublands, and willows are present along the hillside below the proposed CCR Pad location, creating a natural buffer between Buzzard Creek and the proposed well pad.

The receiving water of Buzzard Creek is Plateau Creek (a perennial flow stream). Buzzard Creek flows into Plateau Creek approximately 12 mapped miles west of the project. Plateau Creek continues to flow to the west approximately 20 miles, terminating at the Colorado River.

The proposed CCR Pad is also situated near the Town of Collbran's PWS along Plateau Creek. While the mapped PWS buffer is near the CCR Pad, Collbran's PWS is located upgradient from the CCR Pad. Laramie consulted with both Ute Water and Town of Collbran as detailed in **Table 5**.

7. CONSULTATION

The following table summarizes consultation with both Ute Water and the Town of Collbran.

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Table 5. Consultation with PWS Organizations

Date	PWS Entity	Type of Meeting /Communication	Description
May 7, 2024	Town of Collbran	Town of Collbran – Board Meeting – Public	Laramie presents proposed project to the Town of Collbran during Town Board meeting. Estimated over 30 attendees to meeting. Presentation covered proposed operations, proximity to PWS intake, hydrology, general location, permitting overview (Local, state, and federal), sampling locations & events. Laramie’s presentation and meeting notes provided by Town of Collbran are provided in the Consultation Summary attached to the Form 2A.
June 5, 2024	Ute Water	Presentation at Ute Water Office in Grand Junction, CO	Presentation to Ute Water Staff. Presentation PWS intake, hydrology, general location, permitting overview (Local, state, and federal), sampling locations & events. Laramie’s presentation is provided in the Consultation Summary attached to the Form 2A. Ute Water & Laramie discussed about the sharing of analytical results from sampling collection points shown in Appendix B .
June 6, 2024	Ute Water	Email	Laramie followed up with Ute Water and provided responses to questions posed in meeting.
July 10, 2024	Town of Collbran & Ute Water	Pre-Application Onsite Meeting	Onsite meeting held at the CCR Pad. Attendees walk the access road and well pad.
	Town of Collbran & Ute Water	Email	Laramie emails draft onsite notes.
	Town of Collbran & Ute Water	Email	Laramie emails final onsite notes.
September 3, 2024	Town of Collbran	Town of Collbran – Board Meeting – Public	Laramie presents on updates of the CCR Pad and proposed operations schedule.

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September 6, 2024	Ute Water	Email	Laramie provides draft ECMC Rule 301.c.(1) Emergency Spill Response Program Plan to Ute Water for review and comments.
September 6, 2024	Ute Water	Email	Ute Water reviews the Plan and provides one correction.
September 10, 2024	Ute Water	Email	Ute Water requested to be notified of all spills. Ute Water provides signature of approval.
September 10, 2024	Ute Water	Email	Laramie emails Ute Water the updated spill plan with language of notification and updated Table 9.

8. LARAMIE EMERGENCY CONTACT INFORMATION

Laramie emergency contacts are listed below in **Table 6** and in the Notification Chart **Figure 2**.

Table 6. Emergency Contacts and Notification Information

CCR 0994-23-02 WELL PAD – EMERGENCY CONTACTS	
Site Name	CCR 0994-23-02
Operator	Laramie Energy, LLC (Operator Number – 10433) 3199 D Rd. Bldg A2., Grand Junction, CO 81504
Landowner/Surface Owner	Colorado Canyon Ranch, LLC 9800 Metcalf Ave - 5th Floor, Overland Park, KS 66212
Operations Area	Brush Creek / Plateau Valley
Health & Safety Coordinator	Greg Anogia ganoia@laramie-energy.com 970-263-3627 – Office 970-216-1387 - Cell
South Production Manager	Rory Mortensen 970-778-5161 – Cell 970-487-3843 – Office
For spills, environmental, wildlife	Wayne Bankert (Regulatory & Environmental Manager) 970-812-5310 - Office
	Matt Kasten - Environmental Coordinator 970-263-3675 - Office

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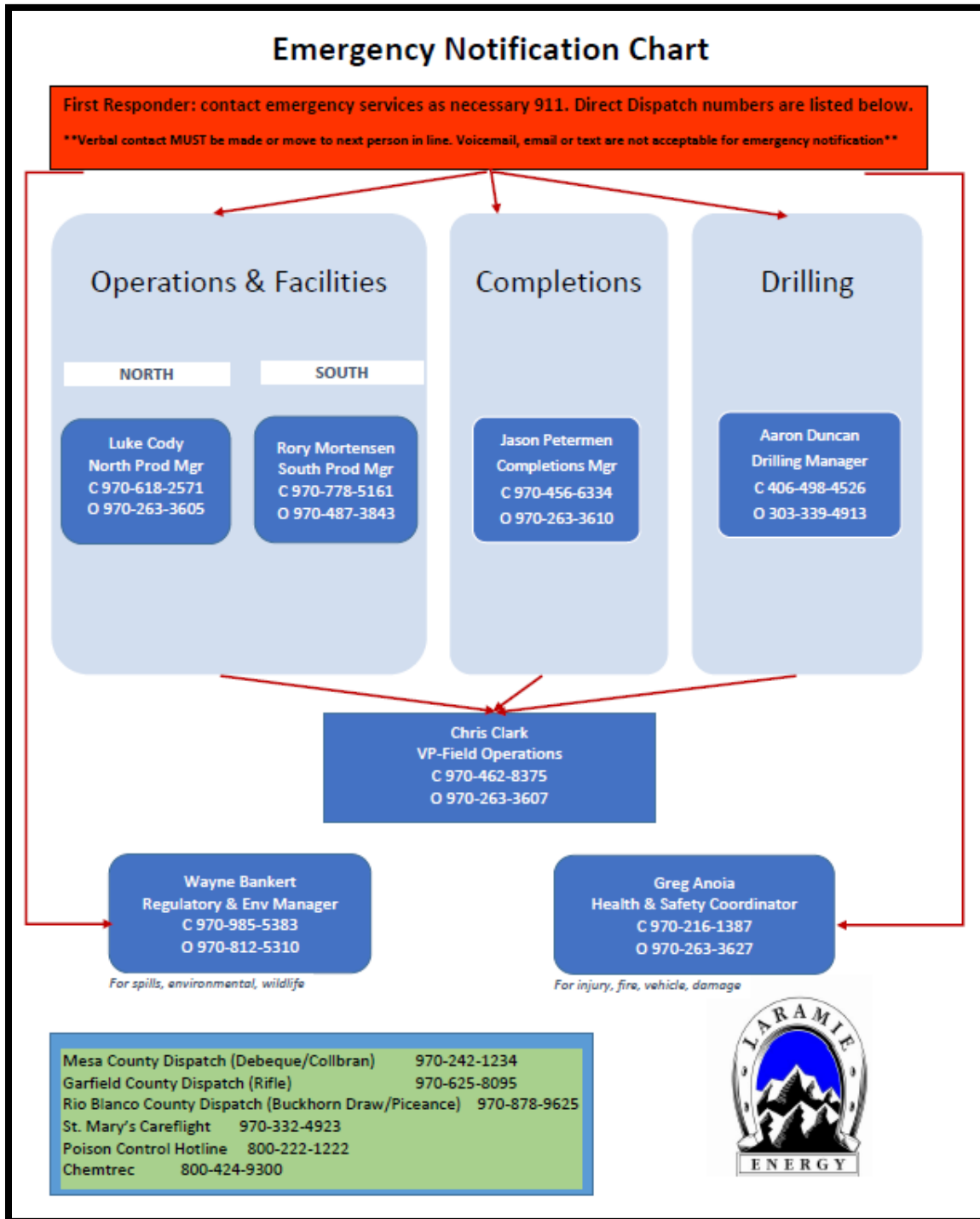


Figure 2. Emergency Notification Chart

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9. EMERGENCY RESPONSE PLAN REQUIREMENT – ECMC RULE 411.a.(4).B.

Table 7 lists contact information of administrator of the PWS located within 15 miles downstream. Ute Water shall be notified of all spills and releases at the CCR Pad, regardless of volume.

Table 7. Ute Water Conservancy District Contact Information

Ute Water Conservancy District – General Information			
Office Phone #	(970) 242-7491		
Address	2190 H 1/4 Road, Grand Junction, CO 81505		
Mailing Address	PO Box 460, Grand Junction, CO 81502		
Website	https://www.utewater.org/		
Ute Water Representatives			
Name	Title	Phone	Email
Dave Payne	Assistant General Manager	P: (970) 256-2855	dpayne@utewater.org
Greg Williams	Assistant Manager		gwilliams@utewater.org
Larry Clever	General Manager		lclever@utewater.org

Per ECMC Rule 912.b.(9) *Report to Environmental Release/Incident Report Hotline: Spills and Releases that impact or threaten a Public Water System intake, as described in Rules 411.a.(4) & 411.b.(5), will be verbally reported to the emergency contact for that facility concurrent with providing the 24 Hour Notification to the Director pursuant to Rule 912.b.(1).*

10. SPILL AND RELEASE NOTIFICATION – ECMC RULE 411.a.(4).C.

Laramie will notify various agencies in the event of a spill or release. Contact information is listed in **Table 8** and criteria notification is detailed in **Table 9**.

The ECMC defines spill and release per the Commission’s 100-Series Rules:

- Spill: shall mean any unauthorized sudden discharge of E&P waste to the environment.
- Release: shall mean any unauthorized discharge of E&P waste to the environment over time.

Laramie maintains an ongoing training program for company personnel and contractors in regards communication and response to spills and releases. Laramie implements internal tracking and notification program which provides a digital record of communication of spills and responses.

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Table 8. Contact Notification List

Agency / Entity	Contact	Contact Information	ECMC Rule Reference
ECMC	NW ENV Protection Specialist	(720)498-5298 Steven.aruaza@state.co.us	912.b.(1), (2), (3), & (4)
CDPHE	Hotline	1-877-518-5608	912.b.(9)
Ute Water	Refer to Table 7		912.b.(9)
Colorado Parks & Wildlife	NW Region Energy Liaison	(970) 986-9767	912.b.(10)
Local Relevant Government: Mesa County	Planning Department	970-244-1636 mccomdev@mesacounty.us	912.b.(7)
	Planning Manager	(970) 254-1483 sean.norris@mesacounty.us	
Surface Owner	Colorado Canyon Ranch, LLC 9800	Metcalf Ave - 5th Floor Overland Park, KS 66212	912.b.(8)
Bureau of Land Management	Natural Resource Specialist - Colorado River Valley Field Office	(970) 876-9000 wtoews@blm.gov	912.b.(7) 912.b.(8)

10.1. COLORADO ENERGY & CARBON MANAGEMENT COMMISSION

Per *ECMC Rule 912.b. Reporting Spills or Releases of E&P Waste, Gas, or Produced Fluids.*, Laramie will submit an initial report (“24 Hour Notification”), within 24 hours of discovery of a spill or release of E&P waste, natural gas, or produced fluids to the ECMC verbally, via electronic mail, or on a Form 19, Spill/Release Report. Criteria for reporting are detailed in ECMC Rule 912.b. and ECMC Operator Guidance Rule 912b. *Reporting Spills or Releases Of E&P Waste, Gas or Produced Fluids* (dated January 28, 2021) and are listed **Table 9**.

10.2. COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT

Any discharge of pollutants to waters of the state (which include surface water, groundwater, or features like dry gullies or storm sewers leading to surface water) must be reported Colorado Department of Public Health & Environment (CDPHE) to 1-877-518-5608 within 24-hours of discovery. The notification must describe, at a minimum:

- The date, time, estimated length of time, and approximate volume of the discharge.
- The cause of the discharge.
- The level of wastewater in the discharging impoundment(s).
- Whether the discharge entered, or could enter, waters of the United States.
- Additional Contacts in the event of a release or spill.

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10.3. SURFACE OWNER

Per ECMC Rule 912.b.(8), Laramie will notify the Surface Owner verbally or in writing to the affected Surface Owner or the Surface Owner's appointed tenant concurrent with providing the 24-Hour Notification. The CCR Pad is located on lands owned by Colorado Canyon Ranch, LLC and there are no structures located on subject parcels.

10.4. UTE WATER CONSERVANCY DISTRICT

Ute Water shall be notified of all spills and releases at the CCR Pad, regardless of volume. Please see **Section 9** for information regarding notification to Ute Water.

10.5. NOTIFICATION CRITERIA TABLE

Table 9. Applicable Criteria for Spill & Release Reporting

ECMC Rule	Description	Agency / Entity						
		ECMC	CDPHE	PWS (Ute Water)	CPW	Mesa County	BLM	Surface Owner
912.b.(1)A.	A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly maintained road	✓	✓	✓	✓	✓	✓	✓
912.b.(1)B.	Spill or Release in which 1 Barrel or more of E&P Waste or produced Fluids is spilled or released outside of berms or other secondary containment;	✓		✓	✓	✓	✓	✓
912.b.(1)C.	A Spill or Release of 5 Barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.	✓		✓	✓	✓	✓	✓
912.b.(1)D.	Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak.	✓		✓		✓		✓
912.b.(1)F.	The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable.	✓		✓	✓	✓	✓	✓
912.b.(1)G.	A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a Spill or Release of any volume that daylights from the subsurface.	✓		✓	✓	✓	✓	✓
912.b.(1)H.	A Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.	✓		✓	✓	✓	✓	✓
912.b.(1)I.	A Release of natural gas that results in an accumulation of soil gas or gas seeps.	✓		✓	✓	✓	✓	✓
912.b.(1)J.	A Release that results in natural gas in Groundwater.	✓		✓	✓	✓	✓	✓

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11. LOCAL EMERGENCY AGENCY APPROVAL - ECMC RULE 602.j.

In accordance with ECMC Rule 602.j., the CCR Emergency Spill Response Program Plan was reviewed and approved by the Ute Water on September 10, 2024. Signature of approval is provided in **Appendix C**.

12. SPILL PREVENTION & RESPONSE BMPS

The following fluid leak detection BMPs are applicable to the CCR Pad stated in this plan.

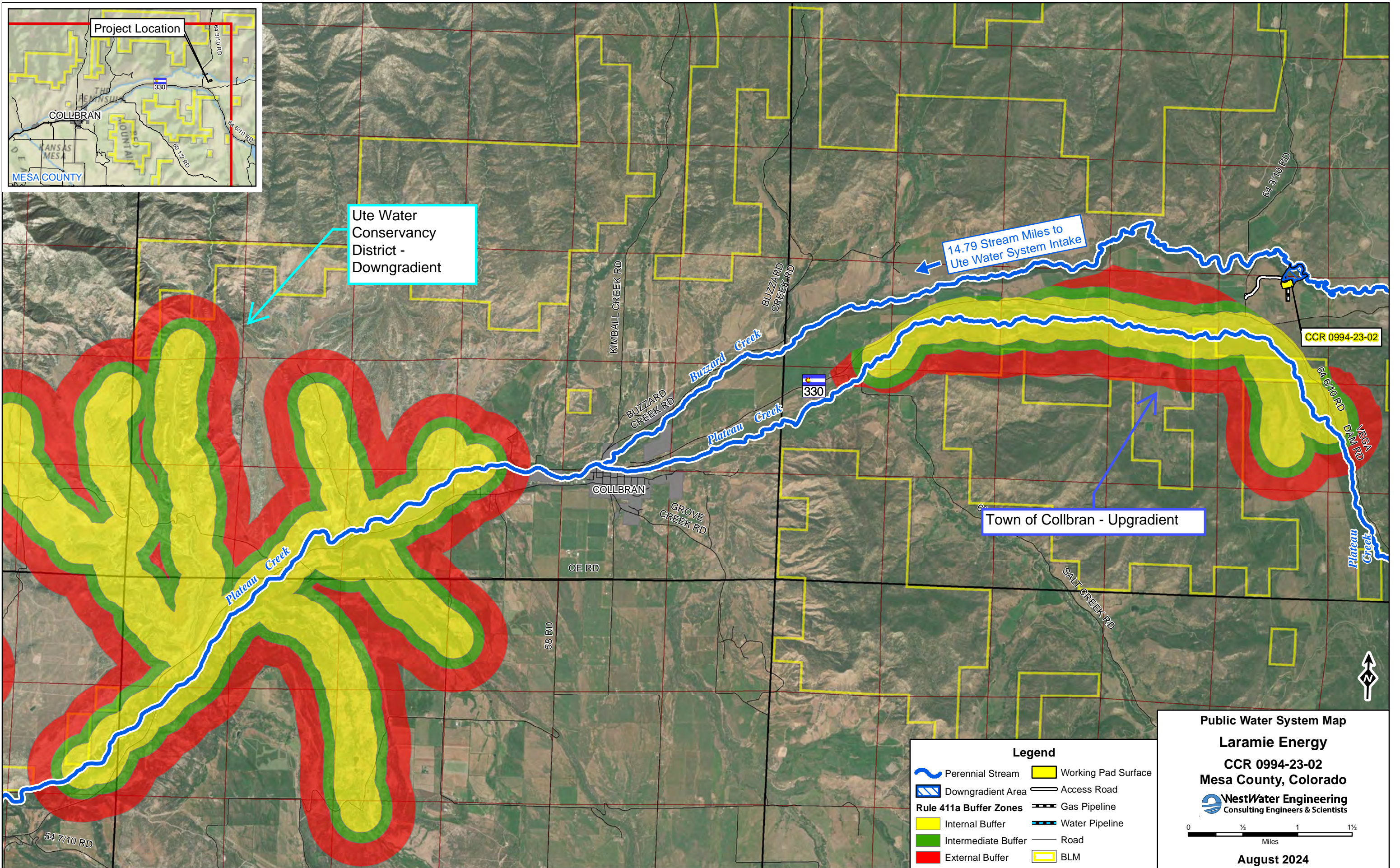
- Laramie spill response procedures will be adhered to for any spills or releases. All spills will be managed in accordance with the ECMC 900 Series rules
- A properly sized containment will be installed and maintained around the production tank battery.
- Production tanks will include remote level monitoring devices to rapidly alert operators of a potential leak or spill.
- Fuel storage tank will have secondary containment underneath fuel pump, fittings, and hose connections.
- Closed loop solids control system will be utilized with no reserve pits.
- All temporary surface water lines will be inspected for leaks every 24 hours when in use.
- An emergency spill kit (95-gallon drum spill kit) will be placed on the pad for any spills that might occur for the life of the producing wells.
- During drilling, completions, and flowback operations, a fully equipped emergency spill response trailer will be staged at an adjacent Laramie operated Oil and Gas Location, the David 23-7 well pad (Location ID # 334500) and prepared for immediate response in the event of the release or spill during pre-production activities. A second emergency spill response trailer will be available for immediate mobilization if needed at Laramie’s Harrison Creek Water Treatment Facility (Location ID # 413056) approximately 7 miles from the CCR Pad location.
- The discharge and dedicated fresh water receiving tank, along with the pump equipment, will be inspected at least once every 12 hours.

LIST OF APPENDICES	
Appendix A	Ute Water Public Water Systems Map
Appendix B	Collbran Watershed Sampling Collection Points Map
Appendix C	ECMC Rule 602.j. PWS Agency Review & Signature



APPENDIX A

UTE WATER PUBLIC WATER SYSTEMS MAP



Project Location

Ute Water Conservancy District - Downgradient

14.79 Stream Miles to Ute Water System Intake

CCR 0994-23-02

Town of Collbran - Upgradient

Public Water System Map

Laramie Energy

CCR 0994-23-02

Mesa County, Colorado

WestWater Engineering
Consulting Engineers & Scientists



August 2024

Legend

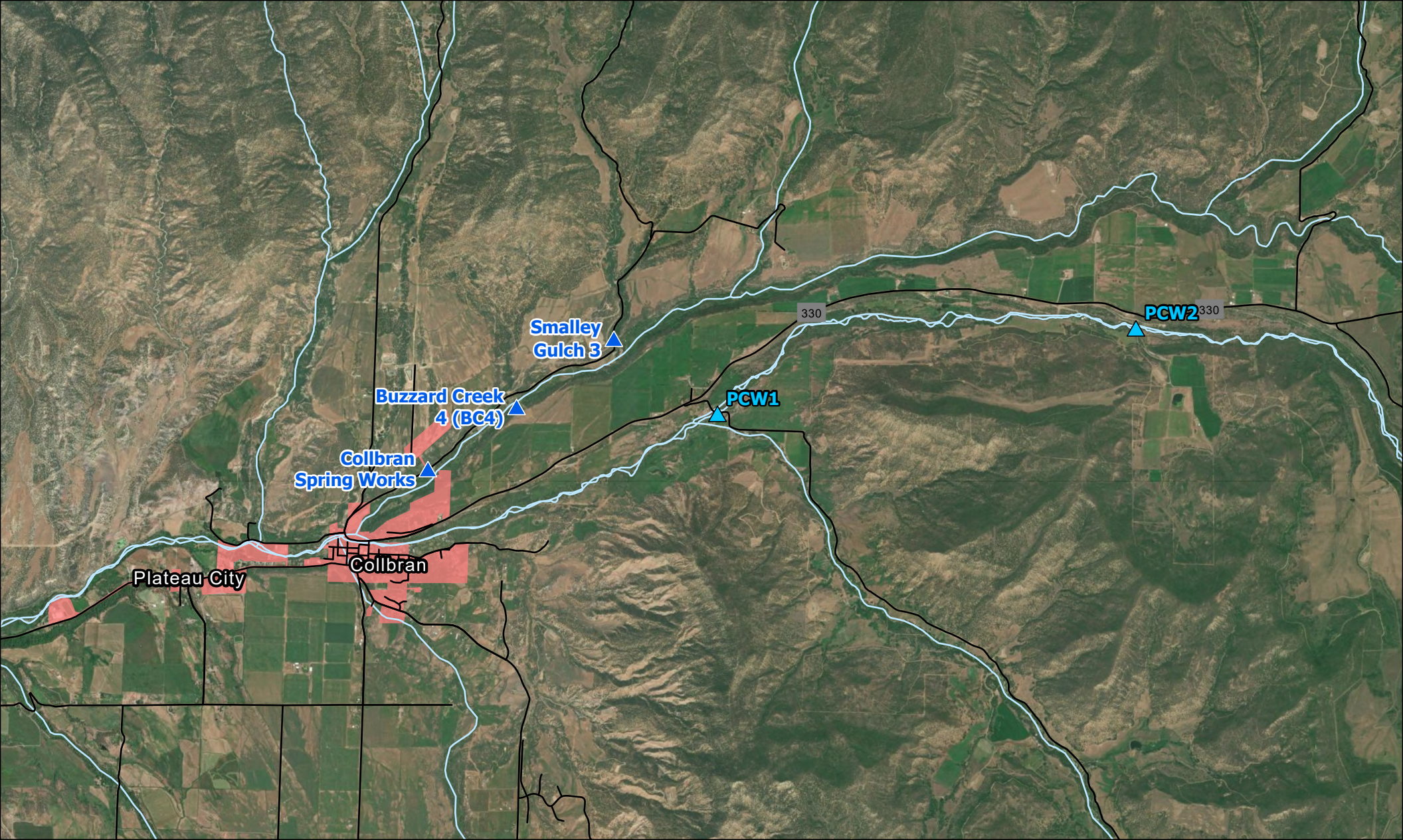
Perennial Stream	Working Pad Surface
Downgradient Area	Access Road
Rule 411a Buffer Zones	
Internal Buffer	Gas Pipeline
Intermediate Buffer	Water Pipeline
External Buffer	Road
	BLM





Map Source: Z:\Laramie Energy\Colorado Canyon Ranch Pad\2024\GIS\PWS Report Map 8-27-24\CCR Pad Public Water System Map 8-27-24.mxd 8/27/2024 rdb

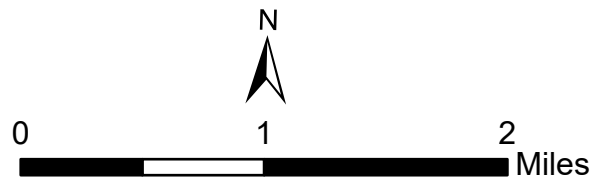


APPENDIX B

COLLBRAN WATERSHED SAMPLING COLLECTION POINTS MAP



-  Upgradient Sampling Locations
-  Downgradient Sampling Locations
-  CCR 0994-23-02 Pad
-  Town of Collbran Municipal Boundary



**Laramie Energy
Collbran Water
Shed Sampling**

CCR 0994-23-02 Pad
NWNE, SECTION 23,
T9S, R94W, 6th P.M.
MESA COUNTY, CO



APPENDIX C

ECMC RULE 602.j. UTE WATER PWS AGENCY REVIEW & SIGNATURE

Laramie Energy, LLC
2024 CCR 0994-23-02 OGD
Emergency Response Plan

Colorado Energy & Carbon Management Commission
Rule 602.j. Local Emergency Response Agency

Grand Junction Office
3199 D Rd. Bldg A2
Grand Junction, CO 81504

Corporate Office
1700 Lincoln Street, Suite 3950
Denver, CO 80203

The following Emergency Response Plan is approved by:

Ute Water Conservancy District



Staff: Dave Payne

Title: Assistant General Manager

Date: September 10, 2024