

From: [Taylor Elm - DNR](#)
To: [Heidi Kaczor](#)
Cc: [Doug Sandridge](#); [Annalee Penner](#); [Danielle Neumann - DNR](#)
Subject: Re: Fulcrum's Janet 0780 S5 Pad - Second Occupation, Form 2 Revisions & Form 4 to Correct Timing Stips
Date: Wednesday, May 7, 2025 1:40:53 PM
Attachments: [image001.png](#)

Hello, Heidi.

Thank you for reaching out on these items. I am not aware of any changes to wildlife resources that would warrant additional or altered BMPs for the second occupation at the Janet 0780 S5 pad location. The original measures would still be applicable for this second occupation to finish the originally planned wells.

Also, thank you for the heads up regarding the second sundry that has been submitted. There should be no issues on our end as you have correctly identified that this location falls within the TL exclusion area contained within the field-wide WMP agreement.

Please let me know if there are any other questions, or if CPW can help with any additional information.

Thank you,

On Tue, May 6, 2025 at 3:59 PM Heidi Kaczor <Heidi.Kaczor@fulcrumeo.com> wrote:

Hello Taylor,

I hope you are well and enjoying the spring weather!

Fulcrum wanted to reach out to inform you of a few items happening with the Janet 0780 S5 Pad in Jackson County.

1. Fulcrum was only able to drill 4 of the proposed 10 wells on this location in 2024. Therefore, there will be a second occupation of the Janet 0780 S5 Pad this year (2025).
 - a. A Form 4 sundry notice was submitted to ECMC notifying them of the second occupation. It was posted for public comment and approved on 3/18/25. Please see the attached copy, as well as the updated operational timeline.
 - b. There will be no pad expansion, and all operations will occur within the bounds of the existing location.
2. As part of this second occupation, Fulcrum will be drilling 4-6 wells in 2025.
 - a. **In an abundance of caution, Fulcrum would like to consult with CPW to ensure the previously agreed upon BMPs in Fulcrum's Fieldwide Wildlife Mitigation Plan and the approved Janet OGDG (ID # 486502) are still valid and appropriate for the second occupation and drilling of wells in 2025. I have attached your original approval email for the Janet OGDG from May 2024 above. If you agree there have been no changes, can you please confirm your approval in a reply to this email?**
3. On a related note, Fulcrum has also submitted a Form 4 to ECMC to correct auto-populated

BMPs which indicate there are Greater sage grouse timing stipulations at the Janet 0780 S5 Pad. These auto-populated timing strips are contrary to the Fieldwide Wildlife Mitigation Plan and the site specific BMPs CPW agreed to in May 2024. There are no wildlife timing stipulations at this location because it is within the Wildlife Stipulation Exclusion Area of the Mitigation Plan. We are still waiting on ECMC's approval of this submittal after making some minor wording revisions, but we wanted you to be aware of this. A copy of the submitted sundry is attached for your reference.

Should you have any questions or concerns regarding any of the items above, please don't hesitate to reach out. I know you and Doug speak often and he's cc'd on this email, so feel free to call him if needed.

Thank you so much!

Heidi Kaczor

Regulatory Consultant

(303) 981-5409



FORM
4
Rev
03/22

State of Colorado

Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

DE

ET

OE

ES

Document Number:
404072637

Date Received:
02/05/2025



SUNDRY NOTICE

This form is required for reports, updates, and requests as specified in the ECMC rules. It is also used to request changes to some aspects of approved permits for Wells and Oil and Gas Locations.

ECMC Operator Number: 10805

Contact Name Heidi Kaczor

Name of Operator: FULCRUM ENERGY OPERATING LLC

Phone: (303) 9815409

Address: 240 SAINT PAUL STREET SUITE 502

Fax: ()

City: DENVER State: CO Zip: 80206

Email: heidi.kaczor@fulcrumeo.com

FORM 4 SUBMITTED FOR:

Facility Type: OIL AND GAS DEVELOPMENT PLAN

API Number : 05- 00 ID Number: 486502

Name: Janet OGD Number:

Location QtrQtr: Section: Township: Range: Meridian:

County: Field Name:

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

Location(s)

Location ID	Location Name and Number
436642	Ray Ranch North 0880 S32 CTB
487288	Janet 0780 S5

OGDP(s)

OGDP ID	OGDP Name
486502	Janet OGD

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**:

FNL/FSL		FEL/FWL	
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>

Change of **Surface** Footage **To**:

FNL/FSL		FEL/FWL	
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>

Current **Surface** Location **From** QtrQtr Sec Twp Range Meridian

New **Surface** Location **To** QtrQtr Sec Twp Range Meridian

Date Run: 3/18/2025 Doc [#404072637]

Page 1 of 7

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

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 OGDP

From: Name JANET OGDG Number 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

☐ REPORT OF TEMPORARY ABANDONMENT

Describe the method used to ensure that the Well is closed to the atmosphere and the Operator's plans for future operation of the Well in the COMMENTS box below as required by Rule 434.b.(1).

☐ REQUEST FOR TEMPORARY ABANDONMENT EXCEEDING 6 MONTHS

State the reason for the extension request and explain the Operator's plans for future operation of the Well 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 _____

☐ SUBSEQUENT REPORT Date of Activity _____

- | | | |
|---|--|--|
| <input type="checkbox"/> Bradenhead Plan | <input 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:

GAS CAPTURE

VENTING AND FLARING:

Operation type: _____ Operational phase requiring venting/flaring: _____

Reason for venting/flaring: _____

Describe Other reason for venting/flaring:

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:

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:

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

Total duration of emission event: _____ 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:

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

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

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.

Fulcrum was able to drill and complete four (4) of the ten (10) approved wells during the initially contemplated 2024 single occupation because its operational window was reduced by the timing of permit approvals and issuance, which caused operations to begin closer to onset of wildlife timing stipulations, and the early onset of adverse winter weather conditions that halted operations due to safety concerns. Fulcrum plans to reoccupy the pad in 2025 to drill and complete the remaining wells.

Operator Best Management Practices

No	BMP/COA Type	Description

Operator Comments:

Fulcrum was able to drill and complete four (4) of the ten (10) approved wells during the initially contemplated 2024 single occupation because its operational window was reduced by the timing of permit approvals and issuance, which caused operations to begin closer to onset of wildlife timing stipulations, and the early onset of adverse winter weather conditions that halted operations due to safety concerns. Fulcrum plans to reoccupy the pad in 2025 (within 12 months of prior operations) to drill and complete the remaining six (6) wells provided for in the Form 2A.

Attached is an update Operational Timeline.

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

Signed: _____ Print Name: Heidi Kaczor
Title: Regulatory Email: heidi.kaczor@fulcrumeo.com Date: 2/5/2025

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

ECMC Approved: NOTO, JOHN Date: 3/18/2025

CONDITIONS OF APPROVAL, IF ANY LIST

COA Type

Description

0 COA

General Comments

User Group

Comment

Comment Date

OGLA	This Form 4 Sundry with proposed changes to the Janet OGDG #486502 was posted 14 days to the ECMC website in accordance with Rule 301.c.	03/18/2025
OGLA	LAS Review complete.	02/18/2025

Total: 2 comment(s)

ATTACHMENT LIST

Att Doc Num

Name

404072637	SUNDRY NOTICE APPROVED-OGDP
404072839	OPERATIONS SUMMARY
404131244	FORM 4 SUBMITTED

Total Attach: 3 Files

Operational Phases for Six Remaining Horizontal Wells located on the Janet 0780 S5 Pad

Phase	Duration (days)	Estimated Start Date
Construction	Completed	NA
Pad Clean-Up & Preparation	14 days	July 2025
Drilling (incl. rig mobilization)	90 days	August 2025
Completion (incl. mobilization) & Flowback	96 days	November 2025
Production	20 years	February 2026
Interim Reclamation	30 days	May/June 2026



240 Saint Paul Street, Suite 502 Denver, CO 80206

From: [Taylor Elm - DNR](#)
To: [Doug Sandridge](#)
Cc: [Heidi Kaczor](#); [Annalee Penner](#); [Ryan Sullivan](#); [Melissa Housey](#); [Justin Garrett](#)
Subject: Re: Janet OGD Application
Date: Thursday, May 9, 2024 12:32:04 PM

Doug,

Thank you for the recent communications regarding this OGD Application. CPW agrees that Fulcrum and its predecessors have conducted numerous pre-application consultation meetings and on-site tours of these proposed locations with CPW staff. We are satisfied that wildlife avoidance, minimization, and mitigation measures have been included pursuant to the terms of the North Park Wildlife Mitigation Plan and ECDC's 300 and 1200 Series Regulations. We also confirm that the locations in the map you provided align with the locations that CPW has been consulted on.

The North Park WMP agreement between CPW and Fulcrum does remain valid, and is currently set to expire on August 31, 2026. CPW confirms that an amendment to the WMP was made to change the name of COGCC to ECDC and designate Fulcrum Energy Operating, LLC as the contract operator for the assets within the WMP boundary. This landscape-scale WMP agreement was implemented to provide a holistic approach to energy development and wildlife protections in the North Park Basin.

Lastly, CPW appreciates the included corrections to the compensatory mitigation amounts that have been included on the two submitted Form 2A applications for this OGD Application. We confirm that the mitigation amounts you have provided are the correct totals to be remitted (no less than 30 days prior to submitting a Form 42 - Construction Notification). We also confirm that we have been provided a copy of the noise mitigation plan, we have provided a Rule 1202.a.(3). waiver for the Ray Ranch North 0880 S32 CTB location, and that we concur with the list of best management practices to be applied to these locations from the wildlife mitigation plan agreement. We recommend following ECDC guidance on how best to incorporate the BMPs into the Form 2A permits so they are enforceable measures upon their approval.

If there are any other questions or needs for additional information, please let us know what we can provide.

Thank you,

Taylor Elm
NW Region Energy Liaison



C 970.986.9767 | P 970.947-2971

0088 Wildlife Way

Glenwood Springs, CO 81601

taylor.elm@state.co.us | cpw.state.co.us



On Thu, May 9, 2024 at 7:04 AM Doug Sandridge <doug@fulcrumef.com> wrote:

Taylor,

As you are aware, Fulcrum Energy Operating, LLC ("Fulcrum") has

submitted an Application for Oil & Gas Development Plan (“OGDP”) which includes the Janet 0780 S5 Pad and the Ray Ranch North 0880 S32 CTB. Following-up our recent telephone conversations, please confirm as follows:

- Colorado Parks and Wildlife (“CPW”) has consulted with Fulcrum and its predecessors on multiple occasions concerning the Janet 0780 S5 Pad and the Ray Ranch North 0880 S32 CTB, dating back to 2014 and CPW is completely satisfied with how Fulcrum has consulted with our staff and with Fulcrum’s plans pursuant to the OGDP.
- The attached map accurately depicts the proposed locations for the Janet 0780 S5 Pad and the Ray Ranch North 0880 S32 CTB.
- CPW hereby confirms that the Wildlife Mitigation Plan dated August 2021 between CPW, Gondola Resources and Fulcrum, et al covering Jackson County (“Wildlife Mitigation Plan”) remains valid and continues to govern Fulcrum’s operations in Jackson County.
- The Wildlife Mitigation Plan has been amended to change the Contract Operator from D90 Energy, LLC to Fulcrum.
- The Wildlife Mitigation Plan has been amended to acknowledge that the Colorado Energy & Carbon Management Commission is the successor to the Colorado Oil & Gas Conservation Commission.
- Except as herein above described, all of the terms and conditions of the Wildlife Mitigation Plan remain unchanged and remain acceptable to CPW.
- The following Wildlife Mitigation Fees apply to Fulcrum pursuant to the Wildlife Mitigation Plan:

- **Janet 0780 S5 Pad:** The proposed Janet 0780 S5 Pad is not within greater sage-grouse PHMA habitat and therefore does not require any compensatory mitigation (direct or indirect). The Form 2A incorrectly reflects that the proposed Janet 0780 S5 Pad is located within Rule 1202.c. no surface occupancy habitat (GrSG lek site). *Fulcrum will request a revision/correction to the Form 2A by ECMC via their preferred method.*
- **Ray Ranch North 0880 S32 CTB:** The proposed Ray Ranch North 0880 S32 CTB is within greater sage-grouse PHMA habitat. Accordingly, Fulcrum will be required to pay a mitigation fee of \$13,750 for direct impacts. Fulcrum will also be required to pay an additional mitigation fee of \$3,441 for indirect impacts (11.47 acres x \$300 per acre – as per the WMP agreement). The Form 2A incorrectly reflects that the proposed Ray Ranch North 0880 S32 CTB is located within Rule 1202.c. no surface occupancy habitat (GrSG lek site). *Fulcrum will request a revision/correction to the Form 2A by ECMC via their preferred method.*
- Fulcrum is planning to sell natural gas produced from any wells drilled on the proposed Janet 0780 S5 Pad to an independent 3rd party at a delivery/sales point to be located on the proposed Ray Ranch North 0880 S32 CTB. The independent 3rd party will be using the natural gas to power equipment located on the proposed Ray Ranch North 0880 S32 CTB. Fulcrum commissioned a noise study which culminated in a Noise Mitigation Plan for the proposed Ray Ranch North 0880 S32 CTB. The Noise Mitigation Plan was submitted to ECMC with the OGD Application. The Noise Mitigation Plan included modeling for the equipment to be operated by the independent 3rd party on the proposed Ray Ranch North 0880 S32 CTB. CPW has had an opportunity to review the Noise Mitigation Plan and CPW has no concerns about the proposed operations on the proposed Ray Ranch North 0880 S32 CTB.

- Fulcrum has prepared a Wetlands Delineation Report covering the proposed Ray Ranch North 0880 S32 CTB. CPW has executed a Waiver to ECMC Rule 1202.a(3) dated October 2, 2023 for the proposed Ray Ranch North 0880 S32 CTB.
- The Wildlife Mitigation Plan contains specific BMPs (see attached). CPW confirms that the attached BMPs remain acceptable for the proposed Janet 0780 S5 Pad and the proposed Ray Ranch North 0880 S32 CTB, as applicable.

Please acknowledge CPW's agreement to the forgoing by responding to this email in the affirmative.

Thank you for your assistance,

Doug Sandridge

Senior Vice President

Fulcrum Energy Capital Funds on behalf of

Gondola Resources, LLC & Fulcrum Energy Operating, LLC

240 St. Paul Street, Suite 502 | Denver, CO 80206

(303) 330-4847 (Cell)

www.fulcrumef.com with interested stakeholders



State of Colorado Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: <u>404072617</u>			
Date Received: <u>04/24/2025</u>			

SUNDRY NOTICE

This form is required for reports, updates, and requests as specified in the ECMC rules. It is also used to request changes to some aspects of approved permits for Wells and Oil and Gas Locations.

ECMC Operator Number: <u>10805</u>	Contact Name <u>Heidi Kaczor</u>
Name of Operator: <u>FULCRUM ENERGY OPERATING LLC</u>	Phone: <u>(303) 9815409</u>
Address: <u>240 SAINT PAUL STREET SUITE 502</u>	Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80206</u>	Email: <u>heidi.kaczor@fulcrumeo.com</u>

FORM 4 SUBMITTED FOR:

Facility Type: LOCATION

API Number : 05- 057 00 ID Number: 487288

Name: Janet 0780 Number: S5

Location QtrQtr: NENE Section: 5 Township: 7N Range: 80W Meridian: 6

County: JACKSON Field Name:

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

Location(s)

Location ID	Location Name and Number
487288	Janet 0780 S5

OGDP(s)

OGDP ID	OGDP Name
486502	Janet 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 <u>NENE</u>	Sec <u>5</u>	Twp <u>7N</u>	Range <u>80W</u>	Meridian <u>6</u>
New Surface Location To	QtrQtr <u></u>	Sec <u></u>	Twp <u></u>	Range <u></u>	Meridian <u></u>

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

OTHER

RULE 502 VARIANCE

Order Number: _____

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

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

From: Name JANET 0780 Number S5 Effective Date:

[illegible]

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

☐ REPORT OF TEMPORARY ABANDONMENT

Describe the method used to ensure that the Well is closed to the atmosphere and the Operator's plans for future operation of the Well in the COMMENTS box below as required by Rule 434.b.(1).

☐ REQUEST FOR TEMPORARY ABANDONMENT EXCEEDING 6 MONTHS

State the reason for the extension request and explain the Operator's plans for future operation of the Well 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 03/05/2025

☐ SUBSEQUENT REPORT Date of Activity _____

- | | | |
|---|--|--|
| <input type="checkbox"/> Bradenhead Plan | <input 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 checked="" type="checkbox"/> Other Correction to wildlife BMPs | | |

☐ 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 Form 4 is being submitted to note there are several Wildlife BMPs on the Janet 0780 S5 Pad approved Form 2A (Doc #403211377) which are not reflective of the CPW approved Fieldwide Wildlife Mitigation Plan currently in place, nor the CPW site specific wildlife BMPs Fulcrum provided to ECMC Staff via email dated May 31, 2024. Fulcrum relied on and presented these CPW approved BMPs in its Janet OGD application and hearing. We believe the BMPs related to Greater sage grouse timing stipulations were auto-populated. These auto-populated BMPs are not relevant to this location.

For these reasons and in compliance with the direction of ECMC Staff (please see attached email), Fulcrum wishes to update the records for the Janet 0780 S5 Pad to note there are NO operational timing stipulations related to Greater sage grouse.

-There are NO timing restrictions for construction, drilling and completions activities from March 1st through June 30th for Greater sage grouse

-There are NO timing restrictions for oil and gas operations being conducted outside the period between December 1st and March 15th for Greater sage grouse winter habitat

-There are NO requirements of operations and maintenance activities being limited between 9:00 am and 4:00 pm during lekking, nesting, and early brood rearing seasons from March 1st through May 15th

GAS CAPTURE

VENTING AND FLARING:

Operation type: _____ Operational phase requiring venting/flaring: _____

Reason for venting/flaring: _____

Describe Other reason for venting/flaring:

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:

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:

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

Total duration of emission event: _____ 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:

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

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 486502 OGDP Name Janet OGDP

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 OGDP UPDATES

PROPOSED CHANGES TO AN APPROVED OGDP

☐ 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 OGDP:

- ☐ 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 OGDP
- ☐ Other

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

Operator Best Management Practices

No BMP/COA Type

Description

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Operator Comments:

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

Signed: _____ Print Name: Heidi Kaczor
Title: Regulatory Email: heidi.kaczor@fulcrumeo.com Date: 4/24/2025

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>
		Stamp Upon Approval
Total: 0 comment(s)		

ATTACHMENT LIST

<u>Att Doc Num</u>	<u>Name</u>
404072617	FORM 4 SUBMITTED
404118742	CORRESPONDENCE
Total Attach: 2 Files	