



Director's Recommendation

Docket Number 241100285

Bison IV Operating LLC (Bison), Operator Number 10670

Friendly Skies OGDG (OGDP ID #490247)

Pursuant to Rule 306, the Director submits to the Commission this Recommendation for approval of this Bison Oil and Gas Development Plan (OGDP) located in Adams County.

The underlying permit documents in support of this Recommendation may be found through the Colorado Energy and Carbon Management Commission (ECMC) website under "[Permits](#)".

Friendly Skies OGDG

Form 2C #403959358

Form 2A #403935924 (747 Pad)

Form 2B #403953718

All supporting hearing documents, including Friendly Skies OGDG hearing application, may be found in ECMC's eFilings System under Docket Number (No.) 241100285.

Background

On November 19, 2024, Bison submitted to the ECMC an application for their Friendly Skies OGDG. Staff returned the Form 2A to Draft status on January 28, 2025, and

requested corrections and/or additional information. The applicant resubmitted the Form 2A on April 18, 2025, and the Director determined the application was complete on May 19, 2025. This Director Recommendation is based on information finalized in the Form 2A, the Form 2B, and the hearing application as of July 2, 2025. No additional revisions will be made to the application prior to the Commission Hearing scheduled for July 23, 2025.

Proposed Development

The Bison Friendly Skies OGDG includes one new Oil and Gas Location (747 Pad Location) in Section 8, Township 3 South / Range 65 West, (Latitude/Longitude coordinates of 39.809250, -104.695390) within the limits of the City of Aurora and Adams County. The Friendly Skies OGDG is located approximately 3 miles south of Denver International Airport (Figure 1). The proposed Location is on FEE surface, and Bison has executed a Surface Use Agreement (SUA) with the land owner. The Memorandum of SUA can be viewed as an attachment to the Form 2A labeled 'SURFACE AGRMT/SURETY'. This Location has an approved siting permit with the City of Aurora and a Development Application is currently in process. The proposed Location is sited in non-irrigated cropland, zoned Airport District, with predominantly adjacent cropland, industrial, and commercial uses.

The 747 Pad Location is proposing 18 new horizontal oil and gas wells. The proposed Location will disturb a total of 18.24 acres of cropland, to be reduced to 7.04 acres after interim reclamation. Access to the Location will be off Jackson Gap Street, located to the east, on an access road requiring 0.92 acres of long-term disturbance. Bison intends to begin construction operations during the second quarter of 2026 and drill and complete all 18 oil and gas wells in a single occupation. Production operations are anticipated to begin during the fourth quarter of 2026. The Location will be tied into existing pipeline infrastructure during the construction of the pad. There will be oil and gas pipeline takeaway; produced water takeaway is not available at this time, and will be trucked off location.

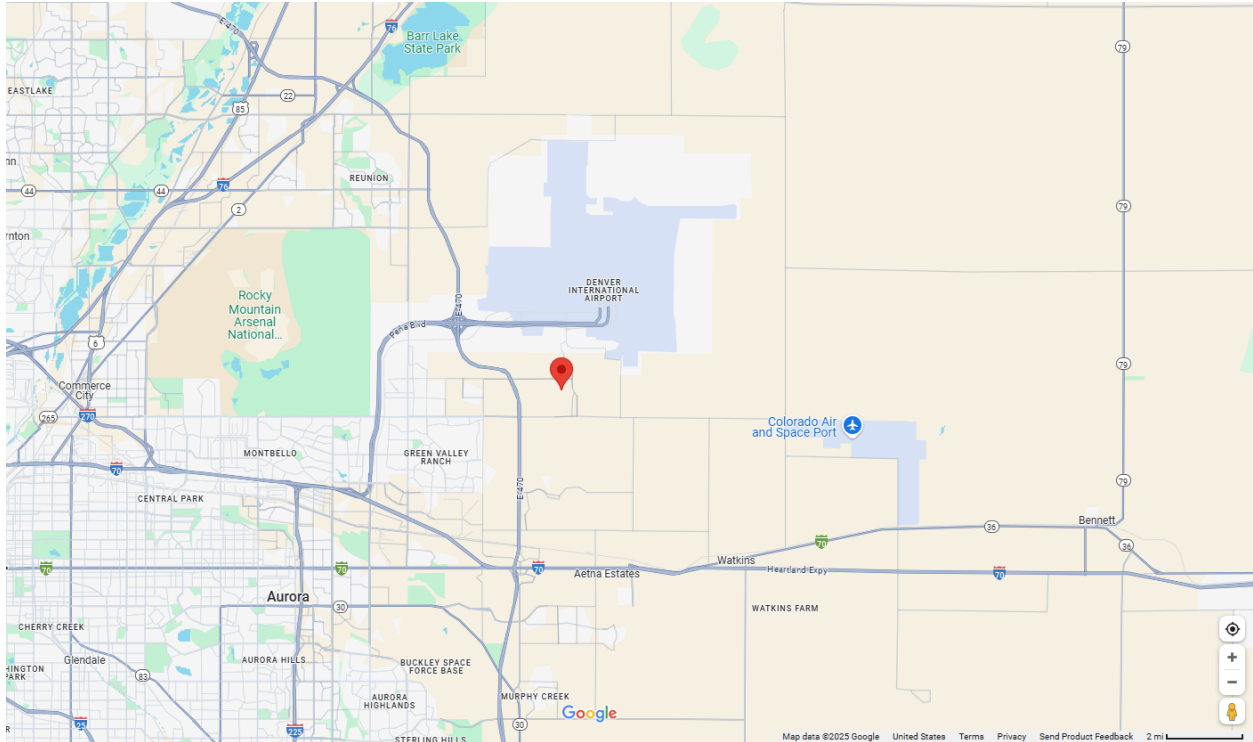


Figure 1: The Location of the Bison Friendly Skies OGD pad is highlighted by the red symbol (Latitude 39.809250, Longitude -104.695390).

Drilling and Spacing Considerations

Bison is requesting the development of Fee minerals covering approximately 5,749 total acres from the Niobrara Formations as follows:

- Vacate Orders: 535-848, 535-901, 535-1081, 535-1083, 535-1316, 535-1327
- Establish a new Drilling and Spacing Unit (DSU)
 - The proposed DSU would establish approximately 5,749 acres for oil and gas development and approve up to eighteen (18) horizontal wells.
 - Bison requests the following unit setbacks for the DSU:
 - 600 feet from the unit boundaries;
 - All wells: an interwell distance of 150 feet.

This spacing, as outlined in Bison’s Hearing Application, complies with applicable ECMC rules.

Financial Assurance

Staff confirmed that Bison has a valid blanket plugging bond on record consistent with Rule 702.

Public Comment

Pursuant to Rule 303.d.(1).A.ii, the Public Comment Period was open for 30 days. No public comments were received on the Form 2A or through the eFiling system during the Public Comment Period.

Local Government Permitting and Pre-Application Consultations

Relevant Local Government: City of Aurora

The City of Aurora is the Relevant Local Government (RLG) for this proposed Location. Bison has a siting permit approved for the surface location of the 747 Pad under the pad name “Deuce” and is in process of submitting a Development Application. The City of Aurora provided comments to this application and can be viewed on the Form 2A. At the time of this Director’s Recommendation publishing, the local permit application was not yet submitted.

Proximate Local Government:

There are no Proximate Local Governments (PLG) to this proposed Location.

Pre-Application Consultation:

A City of Aurora Pre-Application meeting was held on March 27, 2025. Attendees included City of Aurora, Bison representatives, and ECMC Staff. A summary of this meeting can be found on the Form 2A attachment “LGD CONSULTATION.”

Bison did not hold any pre-application consultations with Colorado Department of Public Health and Environment (CDPHE) or Colorado Parks and Wildlife (CPW).

Director's Consultations

A CPW consultation pursuant to Rule 309.e. was not required, and CPW did not request a consultation.

On June 2nd, 2025, the Director consulted with the CDPHE on this OGDP application pursuant to Rule 309.f.; summary and results are as follows:

Staff supports the Best Management Practices (BMPs) found on the Form 2A and agreed to by Bison and CDPHE. CDPHE identified that the proposed Friendly Skies OGDP Location lies within the Denver Metro/North Front Range Ozone Nonattainment Area. Staff acknowledges Bison's commitment to using Tier IV or equivalent engines during drilling and completions, and plans to pipe oil and gas from the proposed 747 Pad Location. CDPHE's consultation can be viewed as an attachment to the Form 2A labeled "CDPHE CONSULTATION".

Administrative Considerations

Lesser Impact Area Exemption (LIAE) Request Summary:

Bison did not request any LIAE for this OGDP application.

Proposed Condition of Approval (COA) on the Form 2As:

No COAs have been placed on the Bison Friendly Skies OGDP at the time of this Director's Recommendation.

ECMC Staff's Technical Review Highlights

This section addresses issues related to siting, public health, safety, welfare, the environment, and wildlife resources, within the context of § 34-60-106(2.5)(a).

Alternative Location Analysis (ALA)

The proposed Location does not meet any Rule 304.b.(2).B.i-x ALA criteria. An ALA was not required and was not submitted.

Public Health, Safety, and Welfare Considerations

The proposed Location does not have any Residential Building Units (RBUs), High Occupancy Building Units (HOBUs), Schools, Child Care Facilities, or Designated Outdoor Activity Areas (DOAA) within 5,280 feet. The proposed Friendly Skies OGDGP is within a Disproportionately Impacted (DI) Community. Within one mile of the proposed Location are several fulfillment and distribution centers, airport parking, and a housing development in the early stages of planning/permitting.

Bison has committed to various BMPs to address impacts from dust nuisances, including utilizing water and commercial dust suppressants to limit fugitive dust on the access road and pad location. Bison will transport fresh water to the Location via lay-flat piping, reducing truck trips during the completion phase. In addition, all new well sites are equipped with automated monitoring systems for 24/7 oversight, reducing daily site traffic. Oil and gas pipelines are in place for production tie-in at this proposed Location. Bison continues to assess produced water pipeline availability for this area, but at this time, Bison intends to truck all produced water. Bison has also committed to several BMPs to minimize and mitigate impacts from emissions, including electrifying the production facility and using a refined distillate derived from petro hydrocarbons that classifies as a Group II drilling fluid, that has a lower BTEX than diesel. Bison has committed to installing an 32-foot-tall STC32 engineered sound wall for approximately 680 linear feet on the east edge of the well pad to reduce noise levels in the area.

Staff concludes that these and other site-specific BMPs, if successfully implemented, should minimize and/or mitigate the potential for adverse impacts to the public, health, safety, and welfare.

Environmental Resource Considerations

The nearest downgradient surface Waters of the State is located 750 feet west and the nearest downgradient wetland is located 4,171 feet to the northwest of the proposed 747 Pad. Depth to groundwater is estimated to be 28 feet below ground surface.

Bison has committed to several BMPs to address potential impacts to groundwater. Bison has provided stormwater mitigation measures for the proposed location that include perimeter controls to mitigate the migration of sediment on and off location. Perimeter controls will be installed to protect downgradient waterways from sediment pollution through the use of detention ponds on the southwest and northwest corners of the pond, equipped with emergency spillways, inlet/outlet protections, ditch and berm system.

Staff concludes the risk of impacts from the proposed Location to groundwater and surface water features will be minimized and mitigated by the successful implementation and maintenance of the proposed BMPs.

Wildlife Resource Considerations

The proposed Location and access road does not fall within any mapped CPW High Priority Habitats (HPH). The proposed Location is greater than one mile from any CPW HPHs.

Bison has committed to the following BMPS as they relate to wildlife: if construction or other earth-moving activities begin within the recognized migratory bird breeding season between April 1 and August 31, Bison will conduct migratory bird surveys no later than one week before construction is scheduled to start to identify potential presence of nesting MBTA species within the Site. Should any nests be identified at that time, Bison will pursue additional surveys, nest monitoring and/or other species-specific best management practices as recommended by and in coordination

with CPW. Bison also commits to consult with CPW and other applicable agencies/personnel, upon the discovery of new wildlife constraints, as needed. Bison will install screening or other devices on the stacks and on other openings of heater treaters or fired vessels to prevent entry by migratory birds. During production, operations will primarily occur during daylight hours, so minimal permanent lighting is anticipated and any permanent lighting will utilize a photocell sensor to automatically shut off. Bison's commitment to utilizing a pit-less, closed loop system for drilling will also minimize impacts to wildlife resources. During completions Bison commits to using a quiet frac completion fleet.

Staff concludes that the BMPs provided by Bison, will effectively mitigate potential direct adverse impacts to wildlife resources.

Director's Recommendation:

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGD's proposed operations and its potential impacts to public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that this OGD complies with all applicable requirements of the Commission's Rules and recommends approval by the Commission.



COLORADO

**Department of Public
Health & Environment**

June 23, 2025

Julie Murphy, Director
Energy and Carbon Management Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

**Re: Colorado Department of Public Health and Environment's Rule 309.f Consultation
Comments for the Bison IV Friendly Skies Oil and Gas Development Plan (Docket Number
241100285)**

The Colorado Department of Public Health and Environment (CDPHE) appreciates the opportunity to consult on the Bison IV Friendly Skies Oil and Gas Development Plan (OGDP), as well as the ongoing collaboration with the Colorado Energy and Carbon Management Commission (ECMC) to fulfill our shared mission to protect public health and the environment. CDPHE's consultation timeline for this OGDP is as follows: CDPHE was contacted initially by ECMC staff on May 19, 2025. CDPHE provided the Best Management Practices (BMPs) spreadsheet for CDPHE-ECMC Consultations to the operator, Bison IV, on May 23, 2025. Bison IV provided to CDPHE its completed BMP spreadsheet for the Friendly Skies OGDP on May 30, 2025. A consultation meeting including CDPHE, ECMC, and Bison IV was held on June 2, 2025. No revisions were requested by CDPHE. Bison IV agreed with committed BMPs as listed on June 12, 2025.

CDPHE notes that the proposed Friendly Skies OGDP contains one pad named 747. There are no residential building units (RBUs) within 2,000 feet of the pad. The OGDP is located within the Denver Metro/North Front Range Ozone Nonattainment Area. The pad in the OGDP is within the boundaries of an identified Disproportionately Impacted Community area, specifically a People of Color Population Socioeconomically Vulnerable Community.

The Friendly Skies OGDP location is sited within an Airport District, specifically that of Denver International Airport. There are multiple large fulfillment/shipping centers nearby, which are largely managed by automated equipment. CDPHE notes that there is a housing development in the planning and permitting stages ~3,945 feet to the southwest. Assuming timely approval through the City of Aurora, the earliest Certificate of Occupancy this development might see is anticipated to be in summer of 2027. Bison IV has reported their intention to be finished with or in the final stages of their drilling and completions operations by that time.



To protect public health and air and water resources, CDPHE supports incorporation of each of the BMPs that Bison IV has committed to in the Friendly Skies OGD, as listed below:

- Operator will utilize engine setups for drilling with emission ratings of at least EPA Tier 4 Final Non-genset or equivalent (e.g. EPA Natural Gas Spark-Ignited Tier 2)
- Operator will cover trucks transporting drill cuttings
- Operator will remove drilling fluids from pipes as they exit the wellbore and ensure that all drilling fluid is removed from pipes before storage
- Operator will utilize engine setups for hydraulic fracturing with emission ratings of at least EPA Tier 4 Final Non-Genset or equivalent (e.g. EPA Natural Gas Spark-Ignited Tier 2)
- Operator will use Modular Large Volume Storage Tanks
- Operator will use pipelines (e.g. lay-flat hose) to transport water used for hydraulic fracturing to location(s)
- Operator will use renewable or grid power for all permanent powered production equipment onsite, excluding external combustion sources
- Operator will have adequate and committed pipeline takeaway capacity for all produced gas
- Operator will shut in the facility if the gas pipeline is unavailable
- Operator will have adequate and committed pipeline takeaway capacity for all produced oil
- Operator will not store hydrocarbon liquids in permanent storage tanks on site (excluding normally empty maintenance tanks)
- The Operator will use a lease automatic custody transfer (LACT) system or technology that is demonstrably equivalent or superior
- Operator will reduce the use of natural gas burners for production equipment (e.g. heaters, separation, etc.) when possible, excluding ECDs
- Operator will collaborate with CDPHE/ECMC to assist in identifying potential sources of emission events observed by CDPHE or ECMC monitoring equipment (e.g. provide event summaries onsite during observed emissions, meet with Agency staff, provide requested additional information timely, etc.)
- Operator will coordinate with nearby fire district(s) to promote any further transition away from PFAS-containing foam and evaluate if PFAS-free foams are available for any specific hazards
- If PFAS-containing foam is used at a location, operator will properly characterize the site, determine contamination extent, perform appropriate soil and water sampling, and capture and dispose of contaminated soil and fire and flush water
- Operator will properly maintain vehicles and equipment
- On forecasted high ozone days: operator will, as practicable, eliminate use of VOC paints and solvents
- On forecasted high ozone days: operator will, as practicable, minimize vehicle and engine idling



- On forecasted high ozone days: operator will, as practicable, minimize truck traffic and worker traffic
- On forecasted high ozone days: operator will, as practicable, postpone the refueling of fleet or personal transit vehicles on location
- On forecasted high ozone days: operator will, as practicable, suspend or delay the use of non-essential fossil fuel powered ancillary equipment (excludes safety-critical or site/well integrity-critical operations)
- On forecasted high ozone days: operator will, as practicable, reschedule non-essential operational activities such as preventative maintenance and tank cleaning
- On forecasted high ozone days: operator will, as practicable, postpone construction activities
- On forecasted high ozone days: operator will postpone flowback if emissions cannot be adequately captured with a vapor recovery unit (VRU)
- Operator will maintain a publicly accessible digital information source (e.g. webpage, social media) with information about this application including a primary contact method to address complaints and concerns

CDPHE has run Colorado EnviroScreen 1.0, Colorado EnviroScreen 2.0, and APCD Regulation 3 analyses on this site, with an overall Colorado EnviroScreen 1.0 score of 62.9. The related report may be viewed as an appendix to this letter.

CDPHE appreciates this opportunity to consult and looks forward to continued collaboration with ECMC. CDPHE also appreciates Bison IV's attentive and timely engagement during this process and we have no additional recommendations at this time. Please do not hesitate to contact me if you have any questions.

Sincerely,



Tessa Sorensen
 Energy Liaison
 Colorado Department of Public Health & Environment

Appendix A - APCD Colorado Air Quality Reg. 3 Environmental Justice Report
 (based on Colorado EnviroScreen 1.0)





Environmental Justice Report

Applicant Information

Company Name: Bison IV

Facility Name: Friendly Skies

Plant AIRS ID Number:

Permit Type: OGDG

Permit Number:

Facility location used for generating the report: 39.80925 , -104.6954

Environmental Justice Summary

Adams County

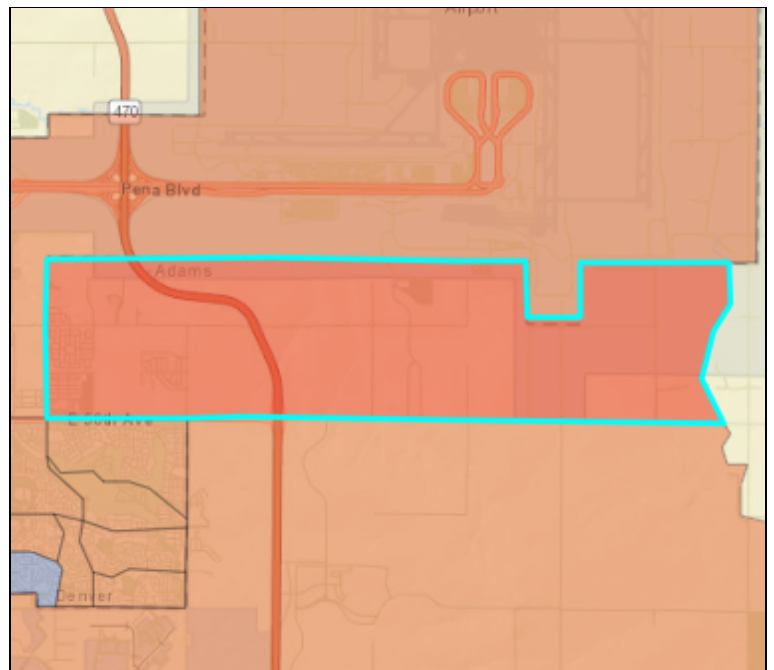
Census Block Group 080010083532

Air Quality Reg. 3 Disproportionately Impacted (DI) Community

Yes

Air Quality Reg. 3 Community Type

Socioeconomically Vulnerable Community



Low-income Population	25%
People of Color Population	59.2%
Limited English Proficiency Population	6.2%
Housing Cost Burdened Population	25.4%
CO EnviroScreen Percentile Score	62.85

Environmental Justice Overview

Environmental Exposures Percentile Score 22.4

The environmental exposures score represents a community's exposure to certain environmental risks relative to the rest of the state. The score ranges from 0 to 100, with higher scores indicating higher burden. The environmental exposures score does not cover all pollutants; it is the average of data on diesel particulate matter, traffic proximity, ozone, PM 2.5, air toxics, other air pollutants, lead exposure risk, drinking water violations, and noise.

Environmental Effects Percentile Score 61.55

The environmental effects score represents how many hazardous or toxic sites are in a community relative to the rest of the state. The score ranges from 0 to 100, with a higher score indicating higher burden. The score is the average of data on proximity to mining, oil and gas operations, impaired surface waters, wastewater discharge facilities, Superfund sites, facilities that use hazardous chemicals, and facilities that generate, treat, store, or dispose of hazardous wastes.

Climate Vulnerability Percentile Score 78.65

The climate burden score represents a community’s risk of drought, flood, extreme heat, and wildfire compared to the rest of the state. The score ranges from 0 to 100, the higher the score, the higher the burden.

Sensitive Populations Percentile Score 59.91

The sensitive populations score captures how at risk a community is to environmental exposures and climate impacts as it relates to health. For example, air pollution has stronger impacts on older and younger people, and people with chronic conditions such as asthma. The score ranges from 0 to 100, with a higher score being worse. The score is calculated using data on asthma hospitalization rate, cancer prevalence, diabetes prevalence, heart disease prevalence, life expectancy, low birth weight rate, mental health, population over 65, and population under 5.

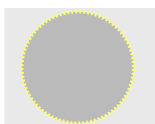
Demographics Percentile Score 67.13

The demographics score represents a community’s social and economic vulnerabilities. The score ranges from 0 to 100, with a higher number representing a higher vulnerability. It is calculated using data on people living with disabilities, housing cost burden, educational attainment, limited English proficiency, income, and race and ethnicity.

One-mile radius with satellite imagery for facility: Friendly Skies



Image above notes a one-mile radius from the location in the center of the circle.



One-mile radius around location used to generate report

An aerial or satellite image of the facility, including a one-mile radius of the surrounding area, is a required component for the Environmental Justice Summary.

This image was generated from the Environmental Justice Report Tool for Air Quality Regulation 3 using the ESRI World imagery basemap. The map features Maxar imagery at 0.3m resolution for select metropolitan areas around the world and 0.5m resolution across the United States. In addition to commercial sources, the World Imagery map features high-resolution aerial photography contributed by the GIS User Community. This imagery ranges from 0.3m to 0.03m resolution (down to ~1:280 in select communities).

For more information, visit: [World Imagery](https://www.esri.com/en-us/world-imagery)

Pollution and Climate Indicators

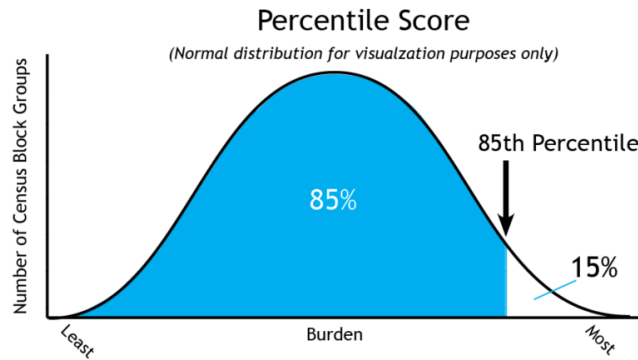
Indicator	Original Unit of Measure	Percentile
Air Toxics Emissions	distance weighted measure of estimated air toxics emissions	74.66
Diesel Particulate Matter	micrograms per cubic meter	36.31
Drinking Water Regulations	population weighted duration (in weeks) of resolved and unresolved health based violations from active community public water systems	13.48
Fine Particle Pollution (PM 2.5)	micrograms per cubic meter	74.94
Impaired Streams and Rivers	average impairment and assessment status of streams	99.42
Lead Exposure Risk	percentage of housing units built before 1960, as an indicator of potential exposure to lead	22.2
Noise	decibels A	36.95
Other Air Pollutants	distance weighted measure of estimated other air pollutant emissions	72.17
Ozone	parts per billion	31.09
Proximity to Hazardous Waste Facilities	distance weighted count of hazardous waste facilities within 5 km	29.1
Proximity to Mining Locations	distance weighted measure of the total number of active coal, hard rock, and construction materials mining permits	83.46
Proximity to National Priorities List Sites	distance weighted count of proposed or listed NPL sites with 5 km	72.28
Proximity to Oil and Gas	distance weighted measure of the total number of active oil and gas locations	92.92
Proximity to Risk Management Plan Sites	distance weighted count of RMP facilities within 5 km	47.85
Traffic Proximity and Volume	amount of vehicular traffic nearby, and distance from roads	11.17
Wastewater Discharge Indicator	toxic chemical concentrations in stream segments per km	34.73
Drought	sum of weekly total percent of an area experiencing a severe, extreme, or exceptional drought	30.29
Extreme Heat Days	average number of high heat days between May and September from 2016 to 2020	88.22
Floodplains	percentage of each geographic area where there is at least a one percent chance of flooding annually	83.72
Wildfire Risk	mean wildfire hazard potential within each geographic area as determined by the US Forest Service, 2021	69.37

Health and Social Indicators

Indicator	Original Unit of Measure	Percentile
Asthma Hospitalization Rate	rate of hospitalization per 100,000 people	86.51
Cancer Prevalence	percent of adults	14.44
Diabetes Prevalence	percent of adults	76.03
Heart Disease in Adults	percent of adults	32.44
Life Expectancy	years	52.54
Low Birth Weight	percent of singleton births	88.3
Mental Health Indicator	percent of adults	64.48
Population over 64 years of age	percent of total population	8.83
Population under 5 years of age	percent of total population	90.63
Disability	percent of total population	32.32
Housing Cost Burdened	percent of total population	37.15
Less Than High School Education	percent of total population	74.18
Linguistic Isolation	percent of total population	84.36
Low Income	percent of total population	52.72
People of Color	percent of total population	86.41

Understanding the Data

The values shown in the Pollution and Climate Indicator and Health and Social Indicator tables are percentiles. Percentiles are a way to see how one area compares to other areas in Colorado. Percentile values range from 0 - 100. A higher score indicates higher burden. Specifically, the percentile tells you the percentage of places in Colorado that have a lower score than the selected location. For example, an area with 85 percentile score for the noise indicator, ranks in the top 15% of areas impacted by noise in Colorado. That means that 85% of the other Census Block Groups in Colorado have a lower score for noise impacts.



The data in the report comes from Colorado EnviroScreen version 1.0. Developed in 2022 by CDPHE and Colorado State University, EnviroScreen maps the overlap of environmental exposures and effects, climate vulnerability, sensitive populations, and demographics to better understand environmental injustice and environmental health risks in Colorado. For more detailed information on the data sources used in Colorado EnviroScreen Version 1.0 see the [technical documentation](#).

On the first page of the report, red text highlights if values for a census block group meet or exceed the criteria for definition of Disproportionately Impacted Community for Air Quality Regulation 3. On subsequent pages of the report, red text highlights indicators in the top percentiles for Colorado that may warrant additional consideration during the permitting process. The Environmental Justice Report is not intended to show individual health risk or exposure.

In the Environmental Justice Summary on the first page, values shown in red indicate a census block group that meets or exceeds the following criteria to qualify as a Disproportionately Impacted (DI) Community for Air Quality Reg 3:

- Over 40% of households are low-income (meaning they are at or below 200% of the federal poverty level),
- Over 40% of the population identify as people of color,
- Over 50% of households are housing-cost burdened (meaning they spend more than 30% of household income on housing costs), or
- Over 20% of the population is linguistically isolated (meaning no adults in a household speak English well).

A census block group that meets or exceeds any of these percentages is labeled as a Socioeconomically Vulnerable Community (SVC).

The CO EnviroScreen Percentile Score, which is also found on the first page of the Environmental Justice Report, is written in red if it is above the 80th percentile. A census block group with a CO EnviroScreen Score above the 80th percentile is labeled as a Cumulatively Impacted Community (CIC).

In other sections of the Environmental Justice Report, including the Environmental Justice Overview, Pollution and Climate Indicators, and Health and Social Indicators sections, indicator and component scores over the 80th percentile

are also highlighted in red. The 80th percentile threshold is used in most cases to flag census block groups that have indicators and groups of indicators (components) that are in the top 20% of census block groups in Colorado. These indicators and components are flagged because they may warrant further review in the permitting process by the permit applicant and/or the Division staff reviewing the permit.

For most indicators, the indicator is highlighted in red if it is above the 80th percentile to indicate that the census block group where the facility is located faces higher risks based on that indicator compared to other Colorado communities. However, less than 20% of census block groups in Colorado have oil and gas facilities or mining locations. Accordingly, all census block groups in Colorado score above the 80th percentile for proximity to these two types of facilities because even having zero facilities puts a community in the top 20%. Accordingly, the Environmental Justice Report highlights a census block group in red if it is above the 85th percentile for mining facilities and above the 90th percentile for oil and gas facilities. This ensures that only census block groups with a greater number of facilities than the statewide average of zero are highlighted on the EJ Report.

Colorado EnviroScreen does:

- Show which areas in Colorado are more likely to have higher environmental health injustices.
- Identify areas in Colorado where government agencies can prioritize resources and work to reduce pollution and other sources of environmental injustice.
- Provide information to empower communities to advocate to improve public health and the environment.
- Identify areas that meet the updated definition of “Disproportionately Impacted Community” under House Bill 23-1233 adopted a definition that applies to all state agencies, including CDPHE.
- Identify areas where the Air Quality Regulation (Reg.) Number 3, which governs permitting in disproportionately impacted communities, applies.
- Identify areas that meet the prior definition of “Disproportionately Impacted Community” under the Colorado Environmental Justice Act (HB21-1266).

Colorado EnviroScreen does not:

- Define a healthy or unhealthy environment.
- Establish causal associations between environmental risks and health.
- Define all areas that may be affected by environmental injustice or specific environmental risks.
- Provide information about an individual person’s health status or environment.
- Take all environmental exposures into account.
- Tell us about smaller areas within a census block group that may be more vulnerable to environmental exposures than other areas.
- Provide information about non-human health or ecosystem risks.

Additional Resources

[Frequently Asked Questions: Environmental Justice Report Tool for Air Quality Regulation 3](#)

[Air Pollution Control Division's Small Business Assistance Program](#)

[CDPHE Environmental Justice Program](#)

[Colorado EnviroScreen Version 1.0 Reports, Guides, and Resources Folder](#)

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the ECMC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the ECMC website at <https://ecmc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:
 OGDG ID:
 Expiration Date:

New Location Refile Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
241100285		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

<No existing OGDP number provided>

CONSULTATION

- This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
- This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
- This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
- This Location includes a Rule 309.e.(2).E variance request.
- This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 10670
 Name: BISON IV OPERATING LLC
 Address: 518 17TH STREET SUITE 1800
 City: DENVER State: CO Zip: 80202

Contact Information

Name: Katie Gillen
 Phone: (720) 370-5737
 Fax: ()
 email: kgillen@bisonog.com

FINANCIAL ASSURANCE FOR THIS LOCATION (check all that apply)

- Plugging, Abandonment, and Reclamation 20250017
- Centralized E&P Waste Management Facility _____
- Gas Gathering, Gas Processing, and Underground Gas Storage Facilities _____
- Surface Owner Protection Bond. _____

Federal Financial Assurance

In checking this box, the Operator certifies that it has provided or will provide at least this amount of Financial Assurance to the federal government for one or more Wells on this Location.

Amount of Federal Financial Assurance \$ _____

LOCATION IDENTIFICATION

Name: 747 Pad Number: _____

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

Quarter: W2NW Section: 8 Township: 3S Range: 65W Meridian: 6 Ground Elevation: 5402
Latitude: 39.809250 Longitude: -104.695390
GPS Quality Value: 1.5 Type of GPS Quality Value: PDOP Date of Measurement: 08/23/2024

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is: LOCATION ID # FORM 2A DOC #

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: ADAMS Municipality: Aurora

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted: _____

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date: 07/24/2019

If Relevant Local Government permit has been approved or denied, attach final decision document(s). Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jeffrey Moore Contact Phone: 303-739-7676

Contact Email: jsmoore@auroragov.org

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted: _____

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location: _____

Status/disposition Date: _____

If Federal agency permit has been approved or denied, attach the final decision document(s). Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: _____ Contact Phone: _____

Contact Email: _____ Field Office: _____

Additional explanation of local and/or federal process:

N/A - No Federal Interest

The 747 Pad surface location has been approved under the Axis, Operating Agreement under the pad name 'Deuce' and meets all the Local Government siting requirements under ECMC Rule 302.c(3) as expressly stated in the Axis, Operating Agreement.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? Yes

Date of local government consultation: 03/27/2025

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation: _____

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? No

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- | | |
|---|--|
| <input type="checkbox"/> i. WPS < 2,000 feet from RBU/HOBU | <input type="checkbox"/> vi.aa. WPS within a surface water supply area |
| <input type="checkbox"/> ii. WPS < 2,000 feet from School/Child Care Center | <input type="checkbox"/> vi.bb. WPS < 2,640 feet from Type III or GUDI well |
| <input type="checkbox"/> iii. WPS < 1,500 feet from DOAA | <input type="checkbox"/> vii. WPS within/immediately upgradient of wetland/riparian corridor |
| <input type="checkbox"/> iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA | <input type="checkbox"/> viii. WPS within HPH and CPW did not waive |
| <input type="checkbox"/> v. WPS within a Floodplain | <input type="checkbox"/> ix. Operator using Surface bond |
| | <input type="checkbox"/> x. WPS < 2,000 feet RBU/HOBU/School within a DIC |

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

< No row provided >

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: ACP DIA 1287 Investors Phone: 720-644-6997
 Address: 4530 E Shea Blvd Ste 100 Fax: _____
 Address: _____ Email: kgillen@bisonog.com
 City: Phoenix State: AZ Zip: 85028

Surface Owner at this Oil and Gas Location: Fee State Federal Indian

- Check only one:
- The Operator/Applicant is the surface owner.
 - The Operator has a signed Surface Use Agreement for this Location – attach SUA.
 - All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.
 - All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number: _____

Mineral Owner beneath this Oil and Gas Location: Fee State Federal Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

Lease description if necessary: Bison owns oil and gas leasehold interests in the Friendly Skies OGDG and has a right to drill in the Application Lands.

SITE EQUIPMENT LIST

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

Wells	<u>18</u>	Oil Tanks	<u>0</u>	Condensate Tanks	<u>0</u>	Water Tanks	<u>4</u>	Buried Produced Water Vaults	<u>0</u>
Drilling Pits	<u>0</u>	Production Pits	<u>0</u>	Special Purpose Pits	<u>0</u>	Multi-Well Pits	<u>0</u>	Modular Large Volume Tank	<u>1</u>
Pump Jacks	<u>18</u>	Separators	<u>8</u>	Injection Pumps	<u>0</u>	Heater-Treaters	<u>0</u>	Gas Compressors	<u>5</u>
Gas or Diesel Motors	<u>0</u>	Electric Motors	<u>0</u>	Electric Generators	<u>0</u>	Fuel Tanks	<u>0</u>	LACT Unit	<u>4</u>
Dehydrator Units	<u>0</u>	Vapor Recovery Unit	<u>8</u>	VOC Combustor	<u>0</u>	Flare	<u>0</u>	Enclosed Combustion Devices	<u>2</u>
Meter/Sales Building	<u>4</u>	Pigging Station	<u>1</u>			Vapor Recovery Towers	<u>0</u>		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Polisher	2
Knockouts	4
Recycle Pump	1
Instrument Air Skid	3
Surge Vessel	4
Scrubber	3
Cooler	1
Blower	3
Electric Skid	1

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Corrosion Inhibitor Tank - 500 Gal	1
Methanol Tank - 330 Gal	3
Emulsion Breaker Tank - 500 Gal	1

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Flowlines - 2"-3" size constructed of carbon steel.
 Water for completions operations will be brought to the location through temporary water lines.
 Oil and gas pipelines will be constructed by a 3rd party midstream company.

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance	Direction	Rule 604.b Conditions Satisfied (check all that apply):			Details of Condition(s)	604.b. (4)
			604.b. (1)	604.b. (2)	604.b. (3)		
Building:	359 Feet	SE					
Residential Building Unit (RBU):	5280 Feet	W	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
High Occupancy Building Unit(HOBU)	5280 Feet	W	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Designated Outside Activity Area:	5280 Feet	SW					
Public Road:	110 Feet	W					
Above Ground Utility:	1048 Feet	SW					
Railroad:	5280 Feet	N					
Property Line:	54 Feet	E					
School Facility:	5280 Feet	SW					
Child Care Center:	5280 Feet	SW					
Disproportionately Impacted (DI) Community:	0 Feet	N					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet	W	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	1	2
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0

School Facilities	<u>0</u>	<u>0</u>	<u>0</u>
Designated Outside Activity Areas	<u>0</u>	<u>0</u>	<u>0</u>

CONSTRUCTION

Size of disturbed area during construction in acres: 18.24

Size of location after interim reclamation in acres: 7.04

Estimated post-construction ground elevation: 5402

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: _____

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: Irrigated Non-Irrigated Conservation Reserve Program (CRP)

Non-Crop Land: Rangeland Forestry Recreation Other

Subdivided: Industrial Commercial Residential

Describe the current land use:

Crop Land

Describe the Relevant Local Government's land use or zoning designation:

Zoned Airport District

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: Irrigated Non-Irrigated Conservation Reserve Program (CRP)

Non-Crop Land: Rangeland Forestry Recreation Other

Subdivided: Industrial Commercial Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

N/A

Reference Area Latitude: _____ Reference Area Latitude: _____

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at <https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/> or from the ECMC website GIS Online map page. Instructions are provided within the ECMC website help section.

NRCS Map Unit Name: PID - Platner loam, 0 to 3 percent slopes

NRCS Map Unit Name: WmB - Weld loam, 1 to 3 percent slopes

NRCS Map Unit Name: WUE - Wiley-Adena-Renohill complex, 3 to 20 percent slopes

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 2662 Feet SW

Spring or Seep: 5280 Feet W

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 28 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Depth to groundwater determination: Static Water Level not shown on water well permit # 62788-MH, located approximately 2,662 feet SW of the Working Pad Surface. State Water Well Database.

Estimated depth to shallowest groundwater found on permit # 70233-, located approximately 5,275 feet SE of the Location.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 750 Feet W

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working

Pad Surface: 4171 Feet NW

Provide a description of the nearest downgradient surface Waters of the State:

There is an NWI-mapped seasonally flooded intermittent riverine system with a Special Flood Hazard (Second Creek), west of the proposed Location. A site assessment indicated the presence of an OHWM. Second Creek will be protected from any stormwater runoff by the well pad perimeter ditch, the detention pond at the south end of the pad, stormwater BMPs, and is located across a paved roadway with curb and gutter.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

Federal (FEMA) State County Local

Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? No

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

This location is included in a Wildlife Mitigation Plan

This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.

This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.

This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.

This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred _____ on:

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.

The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.

The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.

The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.

The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.

The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.

- The applicant has obtained a Rule 1202.a CPW waiver.
- The applicant has obtained a Rule 1202.b CPW waiver.
- In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

Not required because the Location is not within HPH.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: \$ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

Not required because the Location is not within HPH.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: \$ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans 15

Uploaded:

- (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- (6) Transportation Plan
- (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- (13) Fluid Leak Detection Plan
- (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- (17) Wildlife Plan consistent with the requirements of Rule 1201
- (18) Water Plan
- (19) Cumulative Impacts Plan
- (20) Community Outreach Plan
- (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from ECMC Rule or Commission

Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- | | |
|--|--|
| <input type="checkbox"/> 304.b.(1). Local Government Siting Information | <input type="checkbox"/> 304.c.(1). Emergency Spill Response Program |
| <input type="checkbox"/> 304.b.(2). Alternative Location Analysis | <input type="checkbox"/> 304.c.(2). Noise Mitigation Plan |
| <input type="checkbox"/> 304.b.(3). Cultural Distances | <input type="checkbox"/> 304.c.(3). Light Mitigation Plan |
| <input type="checkbox"/> 304.b.(4). Location Pictures | <input type="checkbox"/> 304.c.(4). Odor Mitigation Plan |
| <input type="checkbox"/> 304.b.(5). Site Equipment List | <input type="checkbox"/> 304.c.(5). Dust Mitigation Plan |
| <input type="checkbox"/> 304.b.(6). Flowline Descriptions | <input type="checkbox"/> 304.c.(6). Transportation Plan |
| <input type="checkbox"/> 304.b.(7). Drawings | <input type="checkbox"/> 304.c.(7). Operations Safety Management Program |
| <input type="checkbox"/> 304.b.(8). Geographic Information System (GIS) Data | <input type="checkbox"/> 304.c.(8). Emergency Response Plan |
| <input type="checkbox"/> 304.b.(9). Land Use Description | <input type="checkbox"/> 304.c.(9). Flood Shut-In Plan |
| <input type="checkbox"/> 304.b.(10). NRCS Map Unit Description | <input type="checkbox"/> 304.c.(10). Hydrogen Sulfide Drilling Operations Plan |
| <input type="checkbox"/> 304.b.(11). Best Management Practices | <input type="checkbox"/> 304.c.(11). Waste Management Plan |
| <input type="checkbox"/> 304.b.(12). Surface Owner Information | <input type="checkbox"/> 304.c.(12). Gas Capture Plan |
| <input type="checkbox"/> 304.b.(13). Proximate Local Government | <input type="checkbox"/> 304.c.(13). Fluid Leak Detection Plan |
| <input type="checkbox"/> 304.b.(14). Wetlands | <input type="checkbox"/> 304.c.(14). Topsoil Protection Plan |
| <input type="checkbox"/> 304.b.(15). Schools and Child Care Centers | <input type="checkbox"/> 304.c.(15). Stormwater Management Plan |
| | <input type="checkbox"/> 304.c.(16). Interim Reclamation Plan |
| | <input type="checkbox"/> 304.c.(17). Wildlife Plan |
| | <input type="checkbox"/> 304.c.(18). Water Plan |
| | <input type="checkbox"/> 304.c.(19). Cumulative Impacts Plan |
| | <input type="checkbox"/> 304.c.(20). Community Outreach Plan |
| | <input type="checkbox"/> 304.c.(21). Geologic Hazard Plan |

OPERATOR COMMENTS AND SUBMITTAL

Comments: Bison regulatory contact information was intentionally included in the Landowner contact information to protect the privacy of the landowner. If requested, Bison can provide ECMC with the Landowner contact information separately. The MLVT will be onsite for approximately 75 days. Tank capacity will be approximately 30,000 bbls and tank diameter is 130 feet. The tank vendor/model is Recourse West/Commander model.

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

Signed: _____ Date: 11/19/2024 Email: kgillen@bisonog.com

Print Name: Katie Gillen Title: VP of Reg. Affairs & EHS

Based on the information provided herein, this Oil and Gas Location Assessment complies with ECMC Rules, applicable orders, and SB 19-181 and is hereby approved.

ECMC Approved: _____ Director of ECMC Date: _____

CONDITIONS OF APPROVAL, IF ANY LIST

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

<u>COA Type</u>	<u>Description</u>	
	Operator Best Management Practices	
0 COA		
<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Traffic control	<ul style="list-style-type: none"> To minimize the possibility of fires during the construction phase, equipment, including welding trucks, will be equipped with fire extinguishers and spark arresters. Vehicle users associated with the oil field will be instructed to travel at low speed and remain on existing roads and the well pad at all times. Bison will use SCADA to reduce the frequency of vehicle trips to the Location to monitor well operations. Bison will implement a Transportation Plan to guide the management of transportation throughout the implementation of the proposed project.
2	General Housekeeping	<ul style="list-style-type: none"> Bison will direct site lighting downward and inward, such that no light shines above a horizontal plane passing through the center point light source. Bison will use appropriate technology within fixtures that obscures, blocks, or diffuses the light to reduce light intensity outside the boundaries of the 747 Pad Location. Bison will minimize lighting when not needed to minimize light pollution and obtrusive lighting. Bison will use full cut-off lighting to minimize light pollution and obtrusive lighting. Bison will use lighting colors that reduce light intensity to minimize light pollution and obtrusive lighting. Bison will use low-glare or no-glare lighting to minimize light pollution and obtrusive lighting. When Bison has active operations involving personnel ongoing the Location, Bison will provide sufficient onsite pre-production lighting to ensure the safety of all persons on or near the site. Bison will take all necessary and reasonable precautions to ensure that lighting from the 747 Pad Oil and Gas Facilities does not unnecessarily impact the health, safety, and welfare of motorists on nearby roads. During production, operations will primarily occur during daylight hours so minimal permanent lighting is anticipated. Permanent production lighting will utilize a photocell sensor to automatically shut off lighting.
3	General Housekeeping	<ul style="list-style-type: none"> Water Transportation: Bison has access to an existing freshwater supply nearby. Where possible, fresh water will be transported via lay-flat piping, potentially reducing truck trips by approximately 67,122 during the completion phase. Produced Water Disposal: Bison cannot commit to transporting produced water from the 747 Pad via pipeline but will continue to assess opportunities for a centralized pipeline to an offsite, third-party commercial wastewater disposal facility. If feasible, a pipeline system will be used. Utilizing a pipeline for produced water transport would help reduce truck traffic over the well's lifecycle. Facility Design: Bison is committed to minimizing facility footprint and constructing compact production areas. Production facilities will be designed without oil storage tanks, reducing emissions and the need for oil transportation by truck. Oil and gas will be transported via an underground pipeline network, minimizing traffic, noise, and emissions in the area. Automation and Remote Monitoring: All new well sites are equipped with automated monitoring systems for 24/7 oversight. This allows Bison personnel to turn wells and equipment on and off, verify pressures, and assess temperatures remotely, further reducing daily site traffic.
4	Wildlife	<ul style="list-style-type: none"> Bison will proactively install a sound wall on the east side of the Well Pad during drilling and completion to shield noise from the Building Unit approximately 513 feet to the east; Ensure all personnel and contractors are aware of and adhere to applicable wildlife

		<p>protection measures and BMPs;</p> <ul style="list-style-type: none"> • Personnel and contractors will not harm any wildlife observed on site and will maintain recommended buffer distances related to wildlife; • Personnel and contractors will report any wildlife concerns, including the discovery of injured or orphaned wildlife, to on-site management and applicable EHSR personnel; • Consult CPW and/or other applicable agencies/personnel, upon the discovery of new wildlife constraints, as needed; • Bison will install screening or other devices on the stacks and on other openings of heater treaters or fired vessels to prevent entry by migratory birds. • Use qualified third-party contractors for wildlife surveys, monitoring, and other consultation purposes; and • Document any wildlife-related issues or changes.
5	Wildlife	<ul style="list-style-type: none"> • Bison will inform and educate employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife. • Bison will consolidate and centralize fluid collection and distribution facilities to minimize impact to wildlife. • Bison will adequately size infrastructure and facilities to accommodate both current and future gas production. • Bison will install screening or other devices on the stacks and on other openings of heater treaters or fired vessels to prevent entry by migratory birds. • Bison will mow or brush hog vegetation where appropriate, leaving root structure intact, instead of scraping the surface, where allowed by the surface owner.
6	Storm Water/Erosion Control	<ul style="list-style-type: none"> • Cat-tracking/surface roughening – cat-tracking/surface roughening will be used along the topsoil piles for temporary stabilization. • Check dam – check dams will be installed in the ditches surrounding the pad that convey stormwater to the detention ponds. • Culvert – culverts will be used in the northeast and southwest corners of the pad to convey stormwater into the detention ponds. • Detention pond – engineered detention ponds will be located in the southwest and northwest corners of the pad. The detention ponds are equipped with emergency spillways and outlet pipes with inlet and outlet protections. • Ditch/drainage swale – ditches will be used in conjunction with berms as perimeter control around the disturbance. • Earth dike/berm – berms will be used in conjunction with ditches as perimeter control around the disturbance. • Mulching – mulching will be used in conjunction with seeding at the subject location during/after interim reclamation on the topsoil pile to achieve permanent stabilization. • Riprap/rock armor – riprap will be used at the detention pond outlets. • Seeding – the topsoil pile will be seeded to achieve permanent stabilization. • Silt fence – silt fence will be installed on the southern end of the east perimeter, the west perimeter, and along the north side of the access road. • Stormwater within secondary containment – stormwater that accumulates within secondary containment will be monitored and removed on an as-needed basis. Stormwater will be vacuumed/removed and sent to a registered disposal facility when required. • Surface armor – surface armor will be utilized on all working pad surfaces at the subject location. • Vehicle tracking control – a vehicle track pad will be installed on the access road.
7	Storm Water/Erosion Control	<ul style="list-style-type: none"> • Bison will implement a site-specific Stormwater Management Plan (SWMP) to protect Waters of the State that could receive stormwater runoff from the Location. • Bison will have no staging, refueling, or chemical storage areas associated with the Project in the vicinity of water resources. • Bison will avoid dust suppression activities within 300 feet of the ordinary high-water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river. • Bison will manage potential pollutants located onsite by sealing, wrapping, covering, or having containment/protection while not actively being used in order to eliminate/materials from the site.

		<ul style="list-style-type: none"> • Bison will practice proper storage, safe-handling, good housekeeping, and spill prevention practices and procedures to prevent pollutants or contaminants from leaving the site. • Energy dissipaters such as coconut blankets, straw mulch, or straw waddles will be installed during construction and will be left in place and maintained for the life of the project or until disturbed slopes have been revegetated and stabilized. Locations for these BMPs will be dictated by the site-specific SWMP. • Upon surface owner authorization and per ECMC Rules 615 and 318A.e(4), Bison will collect baseline water quality samples from an appropriate set of water wells within the vicinity of the oil and gas location. Baseline samples will be collected prior to drilling (setting of conductor casing) operations for the initial site well. • Bison will use SCADA to allow for rapid well shutdown in the event of a potential release. 	
8	Material Handling and Spill Prevention	<ul style="list-style-type: none"> • Use of pit-less drilling systems. • Use of closed-loop drilling systems. Daily visual inspections of the flowback vessel and associated equipment Visual inspection of all thief hatches, pressure relief valves, or other access points to ensure they are closed, latched, and seated • Recordkeeping Date, time, description of issues encountered, date and description of corrective actions if any, and personnel performing corrective actions • Records are maintained for a minimum of three years • Flowback and stimulation fluids will be contained within tanks and placed in secondary containment that are also placed in an area with downgradient perimeter berming. • Continuous offsite disposal of flowback water to minimize on-location storage. • Per ECMC Rule, prior to beginning completion operations, pressure testing will be conducted on surface equipment exposed to hydraulic fracturing pressure. • Pressure will be monitored throughout completion operations. • Surrounding the pad with a system of ditches and berms that are intended to collect stormwater runoff and convey it around the edges of the pad. The perimeter berm will also divert any off-site storm water drainage around the site and prevent flooding of the facilities on the site. • The perimeter berm will be sized to contain a 100-year storm event. • Daily visual inspections of the flowback vessel and associated equipment Visual inspection of all thief hatches, pressure relief valves, or other access points to ensure they are closed, latched, and seated • Recordkeeping Date, time, description of issues encountered, date and description of corrective actions if any, and personnel performing corrective actions • Records are maintained for a minimum of three years • Secondary containment will be sized to contain 150% or more of the volume of the largest primary containment vessel within the secondary containment area. Engineered containment berms would be designed and installed to prevent leakage and resist degradation from erosion or routine operation. • Secondary containment areas for tanks are constructed with a synthetic or engineered liner that contains all primary containment vessels and load lines and will be mechanically connected to the steel ring to prevent leakage. • Stormwater BMPs provide tertiary containment around the perimeter of the production facility. • Engineered containment berms constructed around separation equipment. • Production Facilities will be installed with automated fluid level monitoring, capable of alerting the operator in the event of a sudden change in fluid level. • Wells will be equipped with remote shut-in capability. • Corrosion protection for buried piping. • Load lines will be bull-plugged or capped and located inside secondary containment. • Daily, facility wide AVO inspections. • Monthly facility wide Leak, Detection and Repair (LDAR) inspections with infrared cameras. • Pressure monitoring on vessels and sales meters. • Pressure testing on all piping prior to start of production. • Annual flowline pressure testing completed in accordance with ECMC Series 1104 Rules. • Enhanced design and operations and maintenance practices for storage tanks including: Conducting an engineering design analysis of the vapor control system to minimize tank leaks. • Regular inspection of separation, tank, combustion device, and compression equipment. 	

		<ul style="list-style-type: none"> • Storage tank and separator pressure monitoring and automatic well shut-ins. • Use of LACT and oil pipeline to minimize oil tank storage requirements onsite. • Records of the above items will be maintained for a minimum of three years. • To prevent fluid leaks or releases during production, the 747 location will have automated tank fluid level monitoring that will alert Bison in the event of a sudden change in pressure or fluid level. In addition, the wells will be equipped with remote shut-in capability. • Bison Lease Operators and Production Staff will review 747 pad production records daily, including volumes and pressures, to identify irregularities with a tank or on-location flowlines. If an irregularity is detected that may indicate a potential release the suspected tank and/or flowline(s) will be removed from service, isolated, and either pressure tested or visibly inspected for indications of a potential leak, as soon as possible following discovery. • Bison will conduct daily Audio, Visual, and Olfactory (AVO) inspections of all tanks, visible flowlines, and valves. Furthermore, Bison will periodically conduct and document formal site-specific audits to inspect for general site conditions as well as the condition of tanks, flowlines, and containment structures. Statewide and site-specific Spill Prevention Control and Countermeasures (SPCC) plans will be implemented to address any possible spills associated with oil and gas operations. Bison conducts annual personnel training and will conduct and document formal SPCC inspections. All documented inspection records will be provided to the ECMC upon request. • To ensure flowline integrity, Bison will perform and document integrity testing, static head testing, and AVO inspections in accordance with ECMC Rule 1104, following the general safety requirements summarized in Rule 602. Testing and inspection records will be retained for a period of three years or as indicated by ECMC rules. The testing and inspection records will be provided to the ECMC upon request.
9	Material Handling and Spill Prevention	<ul style="list-style-type: none"> • Inspections: Conduct inspections and preventative maintenance on flow lines, storage tanks, and other E&P production equipment; use proper containers, keep lids on containers, and store containers properly to prevent overflow or spillage; maintain secondary containment for recovery of spills; and review SPCC Plans if applicable. • Manifests: All drill cuttings generated during drilling operations are transported offsite with proper manifesting for disposal at facilities properly permitted to receive E&P waste. • Sampling/Disposal/Inspections: Prior to transporting the waste, Bison will ensure that a waste profile is on file with the disposal company or will characterize the waste for profiling. When the waste is sent for disposal, the waste will be identified on the waste shipping manifest. Any associated sampling data, inspection results, and/or SDS information will be kept with the waste profile documentation. Unforeseen wastes not listed in the Waste Stream table will be stored and disposed of in accordance with all regulations applicable to the specific waste. • Hydrocarbon odors from production facilities are minimized and eliminated by keeping produced fluid hydrocarbons and natural gas contained within pipes, separators, tanks, and combustors. All tanks will be sealed with thief hatches and gaskets. Tank vapors are captured with properly sized piping and combustors. • A temporary impermeable synthetic or geosynthetic liner with foam type berms will be utilized under the drilling rig, mud tanks, shakers, and drill cuttings bins. • Bison will not bury or burn trash or other waste materials at an oil and gas location. • All load lines shall be bull plugged or capped. • Secondary containment berms shall be constructed of steel rings or walls with a synthetic or engineered liner. • All liner seams will be welded and tested in accordance with applicable ASTM international standards. • Trash receptacles will be designed, maintained, and operated to exclude wildlife, and to protect public safety, the environment, and wildlife from exposure to overflowing, leak-prone, or insecure trash receptacles.

10	Dust control	<ul style="list-style-type: none"> • Bison will minimize the amount of fugitive dust through the use of speed restrictions. All vehicles will be subject to a speed limit of 15 MPH on all lease roads to minimize dust. • Bison uses traffic signs when leaving the location to remind drivers of specific routes to utilize. • Automation of the wells and production facilities which provides the ability to monitor the site and complete basic tasks remotely instead of a physical trip to the site. • Restriction of construction activity during high-wind days. • Silica dust from handling sand used in hydraulic fracturing operations will be mitigated by utilization of the enclosed Sand Box type sand delivery method. • Bison will stabilize the topsoil stockpiles utilizing vehicle tracking perpendicular to slope angle for short-term stabilization and drill seed/crimped straw mulch application for longer-term stabilization measures to suppress fugitive dust caused solely by wind. • Bison will work diligently to ensure all disturbed surfaces due to oil and gas operations are properly stabilized to minimize any dust migration. This will include armoring surface areas needed for ongoing operations to enhance stability, reduce dust generation, and minimize erosion caused by vehicle traffic and environmental factors. • Bison will primarily utilize water and/or commercial dust suppressants to limit and creation and spread of fugitive dust on the access road and pad locations. While Bison plans to use freshwater for dust suppression efforts, in some situations, chemical-based palliatives may be considered as a necessary long-term dust mitigation solution. Should chemical soil binding compounds such as magnesium chloride or similar products be used, Bison will maintain the requisite safety data sheets (SDS) and make said SDS documentation available to state and local government officials. • Bison will use only fresh water (potable or non-potable) to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body. • Approximately 680 linear feet of 32-foot-tall sound wall will be installed along the east edge of the well pad during the drilling and completion phases. In addition to mitigating noise, the sound wall will serve as a barrier to reduce wind-driven dust migration, vehicle-generated dust, and shield nearby structures to the east from dust exposure. <p>Operators will not use any of the following fluids for dust suppression:</p> <ul style="list-style-type: none"> • Produced water • E&P Waste or hazardous waste • Crude oil or any oil not specifically designed for road maintenance. • Solvents • Any process fluids 	
11	Noise mitigation	<ul style="list-style-type: none"> • Bison conducted a Noise Impact Assessment (NIA) for each phase of operations (drilling, completions, and production) to assess operational noise levels against the maximum permissible dBA and dBC noise levels stated in the Colorado ECOM Rule 423 noise regulation. Each phase of operation will comply with the MPNLs of both codes as summarized in Table 4 in Section 2 of this document. • Prior to commencement of drilling and completion activities, engineered sound wall consisting of approximately 680 linear feet of 32-foot-tall STC32 sound wall will be installed on the east edge of the well pad to reduce noise levels in the area. • Bison will utilize a low noise completions fleet for all completions operations. • Flowback operations and equipment were reviewed as part of this Noise Mitigation Plan (NMP). Flowback utilizes a fraction of similar, but smaller equipment compared to the three other operations studied. Perimeter sound walls will be left in place until drill out is complete and flows are initiated to appropriately manage noise levels for this operation. • A pre-operational ambient sound level survey was conducted at the two locations outlined in Figure 2 of Section 7 to quantify pre-existing A- and C-weighted sound levels. 	

		<ul style="list-style-type: none"> • Throughout the duration of preproduction operations and any construction lasting longer than 24 hours, Bison will conduct continuous noise monitoring at the monitoring locations described in Figure 13 of Section 9 of this document. • If the drilling rig or completions fleet is changed prior to commencement of operations, the mitigation measures employed will be equally or more protective. • Bison will post contact information to receive and address noise complaints arising from pre-production operations around the clock, 24 hours, 7 days per week. Upon receipt of a complaint, either directly to Bison, or from the Colorado ECOM, a Bison representative will contact the associated stakeholder within 48 hours of receipt. • Bison will orient equipment within the Location to reduce potential noise during pre-production and production activities. 	
12	Emissions mitigation	<ul style="list-style-type: none"> • Bison will employ practices for continuous control of fugitive dust caused by operations as identified in the dust mitigation plan. • Bison uses a gravity fed box proppant delivery system that meets OSHA standards, rather than the historic pneumatic trailer proppant transfer system that blows sand out of the trailer into frac sand silos on the location; a method that required supplemental dust delivery container is also a well pad storage container, eliminating the need for frac sand silos on location. Storing frac sand in containers reduces sand dust during fracing operations by dropping sand directly from the container into the blender sand hopper. • Bison will not flare produced gas during normal operations. • Bison will use supervisory control and data acquisition (SCADA) systems to monitor well operations, which will reduce emissions from vehicle traffic due to the reduced number of vehicle trips to the site. • Bison will employ vapor recovery technology to capture condensate storage tank emissions and route them into the sales pipeline. Any condensate storage tanks emissions that are not routed to the sales line will be combusted in an emission control device with at least 95 percent control efficiency. • Bison has a 24/7 Field Monitoring (FMR) that allows for continuous monitoring of operating conditions when personnel are not on-site to identify and correct any improper operations as soon as possible. • Bison has a Preventative Maintenance (PM) program that contributes to the decrease in fugitive emissions and spills related to non-functioning or aging equipment. • Bison will capture produced water storage tank emissions and route them to an emission control device with at least 95 percent design control efficiency. • Bison will use no bleed pneumatic control valves on the production facilities. • Tanks and Vapor Control Systems will also be designed and constructed in accordance with Air Quality Control Commission Regulation Number 7. • Bison will implement a Leak Detection and Repair program (LDAR) including inspections using infrared (e.g., FLIR) cameras. • As Bison is committed to closed-loop drilling there will be no emission-producing reserve pits. 	
13	Odor mitigation	<ul style="list-style-type: none"> • Oil and gas operations will be in compliance with the Department of Public Health and Environment, Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. • Oil and gas facilities and equipment shall be operated in such a manner that odors do not constitute a nuisance or hazard to public welfare. • Bison utilizes a refined distillate derived from petro hydrocarbons that are specifically designed for downhole OBM drilling purposes. This product provides a higher aniline point and a lower BTEX than straight diesel which should reduce the odor associated with the OBM system. The refined distillate is generally classified as a Group II fluid per the manufacturer as it is not a diesel nor is it a synthetic mineral oil or an additive/odor neutralizer. • Aromatics will also be mitigated during completion operations by virtue of the utilization of closed flowback tanks with all water/gas vapors being sent to a temporary ECD during the flowback period. • Hydrocarbon odors from production facilities are minimized and eliminated by keeping produced fluid hydrocarbons and natural gas contained within pipes, separators, tanks, and combustors. 	

- All tanks will be sealed with thief hatches and gaskets. Tank vapors are captured with properly sized piping and combustors.
- If drilling mud is to sit stagnant for any lengthy period of time, biocides will be added to prevent the build-up of nuisance odors.
- Bison shall utilize appropriate biocide treatments to control bacterial growth and related odors as needed.
- The moisture content of water/bentonite-based mud (WBM) generated cuttings managed onsite must be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts.
- A closed-loop system is used for both water-based and oil-based mud. All drilling mud and waste will be hauled off for disposal. Oil-based mud will only be used in drilling the producing portion of the wellbore.
- All odor-emitting substances are hauled off location as quickly as possible. Cuttings are hauled off daily when the facility is open.
- Any stored mud additives are contained in sealed sacks or drums prior to removal or use.
- Water-based mud is a gypsum/water clear fluid that typically carries the odor profile of fresh dirt and is not normally susceptible to odor-causing bacterial degradation.

14	Interim Reclamation	<ul style="list-style-type: none"> • Compaction alleviation – compacted soils and areas of the location impacted by construction will be ripped to a minimum depth of 18 inches prior to topsoil replacement. Decompaction will be performed by a parabolic Ag style ripper capable of fracturing the soil ensuring soil layers are not mixed. Proper decompaction will allow for greater water infiltration and promote vegetation growth. • Erosion control – seed/mulch application will be installed on any areas not needed for ongoing operations (i.e., topsoil pile). The interim working pad will be stabilized against potential erosion for the long-term with surface armoring. • Grading – grading will be employed on all areas not needed for ongoing operations by reshaping the ground surface to planned grades. • Mulching – mulching will be employed in conjunction with seed application to stabilize and promote vegetation growth on the topsoil pile. • Placement of soil – any subsoil used during interim reclamation will be applied first, followed by top soil, in order to ensure that topsoil is not contaminated or adulterated and to ensure optimum germination efforts. • Packing of soil layers – individual soil layers will be applied and packed separately and sequentially during interim reclamation. • Recontouring – areas not needed for ongoing operations will be brought back to their predisturbance conditions by recontouring areas where reclamation will occur. • Routine inspections – the operator, and/or third-party contractors will conduct routine and regularly scheduled inspections during which the reclamation and general site conditions are inspected and monitored. • Stockpile management – topsoil will be stockpiled onsite along the eastern and southeastern edges of the pad and in the northeast corner for later use in the reclamation process. A topsoil pile will remain along the eastern edge following interim reclamation. The stockpiles will be cattracked/surface roughened initially and seeded/mulched later for permanent stabilization. • Surface armor – surface armor will be used on all areas needed for ongoing operations at the subject location. • Topsoil salvage – topsoil will be salvaged prior to construction of the pad. In order to maintain microbial activity of the topsoil, compaction will be limited, slopes will be 3:1 (with a height of 12 feet – and less in some areas) and the topsoil stockpile will be seeded/mulched to promote vegetation growth. • Training – employee training on spill prevention, stormwater, and associated practices and procedures will be conducted routinely throughout the life of the pad. • Weed control – in accordance with the ECMC Rule 1003.f and the Colorado Noxious Weed Act, invasive plants will be monitored throughout all phases of construction during routine stormwater inspections, and the local weed division will be consulted when necessary. Bison maintains a weed mitigation maintenance schedule to prevent weed establishment on the topsoil pile and other areas of potential concern. Management will be performed by either mowing or spraying and on some occasions both methods may be necessary. 	
15	Interim Reclamation	<ul style="list-style-type: none"> • Cat-tracking/equipment-tracking will be used as a temporary stabilization measure of the topsoil piles. • Seed/mulch will be used as a permanent stabilization measure of the topsoil piles. • Weed mitigation will be performed (mowing and/or spraying) on a routine basis per Bison’s seasonal schedule and on an ad-hoc basis when necessary. Routine inspection throughout the life of the pad will be used to identify when action is needed beyond the routine weed mitigation schedule. Bison will also coordinate with the local weed authority/agency, when necessary, in compliance with the Colorado Noxious Weed Act. • Compaction will be limited to maintain microbial activity within the topsoil piles, and the topsoil stockpiles will be seeded/mulched to promote vegetation growth. 	
16	Interim Reclamation	<ul style="list-style-type: none"> • All available topsoil will be removed from the well pad and stockpiled/stored along the eastern edge of the proposed pad to retain indigenous seed bank and soil microbes that are fundamental to site restoration. To mitigate topsoil loss and migration of soil offsite, the stockpile will undergo surface roughening, seeding, and mulching. Unless infeasible, topsoil shall be preserved for those areas of a site that will utilize vegetative 	

final stabilization.

- Control measures for erosion and sediment control may include, but are not limited to, wattles/sediment control logs, silt fences, earthen dikes, drainage swales, sediment traps, subsurface drains, pipe slope drains, inlet protection, outlet protection, gabions, sod stabilization, slope roughening, maintaining existing vegetation, and preservation of mature vegetation. These structures will be installed during construction and left in place and maintained for the life of the project or until the disturbed slopes have been revegetated and stabilized.
- The site will be routinely inspected for CM integrity and current installation. Any deficiencies will be noted and addressed in a timely manner.
- Bison will limit construction activities during wet periods to avoid excess disturbance of areas surrounding operations.
- Unless specifically requested by the landowner, the proposed access road and well pad will be contoured and revegetated to a stable condition.
- Bison will regrade cut and fill areas awaiting reclamation to match pre-existing contours to the nearest extent possible to provide long term erosion control and site stability.
- Bison will grade the topsoil stockpile to ensure that all surfaces can be stabilized safely and effectively.
- Bison will stabilize and maintain areas needed for production operations or for subsequent drilling operations to minimize dust and erosion to the extent possible.
- Bison will implement an SPCC Plan to protect soil from potential spills.
- Bison will confirm that erosion and sedimentation controls are implemented as necessary before and after seeding operations, as detailed in the site-specific SWMP.
- Bison will monitor and maintain the vegetation on the topsoil stockpiles to promote native vegetation and suppress invasive and noxious weeds.

Total: 16 comment(s)

ATTACHMENT LIST

Att Doc Num	Name
2269017	LGD CONSULTATION
403935924	FORM 2A SUBMITTED
403979440	GEOLOGIC HAZARD MAP
403979442	OIL AND GAS LOCATION GIS SHP
403979447	RELATED LOCATION AND FLOWLINE MAP
403979451	MULTI-WELL PLAN
403979453	NRCS MAP UNIT DESC
403979458	WILDLIFE HABITAT DRAWING
403998808	SURFACE AGRMT/SURETY
404135175	ACCESS ROAD MAP
404135176	CULTURAL FEATURES MAP
404135182	HYDROLOGY MAP
404135194	LOCATION DRAWING
404135196	LOCATION PICTURES
404135198	PRELIMINARY PROCESS FLOW DIAGRAMS
404148855	LAYOUT DRAWING
404171121	OTHER
404209531	OTHER

Total Attach: 18 Files

General Comments

User Group	Comment	Comment Date
OGLA	The summary of the pre-application meeting held with the City of Aurora was originally loaded to the 2A as "PRE-APPLICATION COMMUNNITY MEETING SUMMARY" but has been relabeled as the "LGD CONSULTATION".	07/01/2025
LGD	<p>Staff added the following comments received via email from the LGD on June 16, 2025:</p> <p>In response to this Form 2A submitted to ECMC by BISON IV OPERATING LLC ("Bison" or Operator) for the development of oil and gas minerals at the 747 Pad, the City of Aurora (City) is pleased to submit the following comments:</p> <ol style="list-style-type: none"> 1) The Operator received local location approval from the City of Aurora on July 24, 2019. 2) The Aurora City Council approved the location following a Public Hearing. 3) The location was approved via an Operator Agreement between the City of Aurora and AXIS EXPLORATION, LLC. In March 2025, the City approved the transfer of the location and Operator Agreement to Bison. 4) For clarity, in the original Operator Agreement, signed in 2019, the 747 Pad was first called ACP 8E, and was located approximately one-half mile south of the current site. The ACP 8E was shifted to the current site in July 2023, via a public hearing at City Council, and 10 wells were added, bringing the approved total number of wells to 18. The name of the well site was also changed to 747 Pad. The ACP 8E was shifted north to avoid a drainage. 5) The Operator Agreement requires the Operator to employ 53 Best Management Practices (BMPs) and other provisions in the Operator Agreement during the construction, drilling, completion, production, and reclamation of this well. The BMPs are designed to protect public health, safety, welfare, the environment, and wildlife resources. 6) The City of Aurora is in regular communication with staff at Bison regarding their plans for this location specifically. The City met with the Operator on March 27, 2025, to discuss the plans for this site in a pre-application meeting. We appreciated that staff from ECMC also attended the pre-app meeting with us. 7) Bison has not yet submitted an application for this site to the City, but has indicated they expect to submit one soon. When it does, it will undergo a normal 13-week review cycle, and will be approved administratively once all conditions are met. Bison will submit a separate application with Aurora for pipeline easements to access the 747 Pad. 8) The file listed in your application materials as "PRE-APPLICATION COMMUNNITY MEETING SUMMARY" contains notes from the pre-application meeting with Aurora staff on March 27, 2025. For clarity, the public was not invited to that meeting. An actual Neighborhood Meeting will be required during the Aurora application process. 9) By the time this application review proceeds, Harvest Road may be constructed immediately adjacent to the west of the 747 Pad. If constructed, and if preferred, that may provide an additional or replacement access point to the 747 Pad. 10) We support the approval of this Form 2A at ECMC, with the drilling of up to 18 wells. 11) The Operator Agreement requires the wells to begin drilling prior to July 31, 2026. <p>Thank you for the opportunity to submit these comments. Jeffrey S. Moore, P.G. Manager - Energy and Environment Division - City of Aurora jsmoore@auroragov.org 303-739-7676</p>	06/17/2025
OGLA	The Director has determined this OGD application is complete. Form pushed to IN PROCESS.	05/19/2025

OGLA	The Conditions of Approval (COA) and Best Management Practices (BMPs) on the Form 2A and the Final Order are the final enforceable permit conditions for this Oil and Gas Location. Any plan or attachment that contains information or language that is contrary to or less protective than ECMC rules or the COAs and BMPs on the Form 2A or Final Order does not relieve the operator from compliance with the applied COAs, BMPs or any ECMC rules.	05/19/2025
OGLA	With operator concurrence the Pre-Application meeting date and summary were added to this application.	05/19/2025

Total: 5 comment(s)

Public Comments

No public comments were received on this application during the comment period.