

**State of Colorado**  
**Energy & Carbon Management Commission**

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|                                      |    |    |    |
|--------------------------------------|----|----|----|
| DE                                   | ET | OE | ES |
| Document Number:<br><u>404344590</u> |    |    |    |
| Date Received:                       |    |    |    |

**SUNDRY NOTICE**

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

|   |   |
|---|---|
| ECMC Operator Number: <u>96850</u>                        | Contact Name <u>Jonathan Humphreys</u>              |
| Name of Operator: <u>TEP ROCKY MOUNTAIN LLC</u>           | Phone: <u>(573) 466-0068</u>                        |
| Address: <u>1058 COUNTY ROAD 215</u>                      | Fax: <u>( )</u>                                     |
| City: <u>PARACHUTE</u> State: <u>CO</u> Zip: <u>81635</u> | Email: <u>jonathan.humphreys@flywheelenergy.com</u> |

**FORM 4 SUBMITTED FOR:**

Facility Type: WELL

API Number : 05- 045 06957 00 ID Number: 211198

Name: CLOUGH Number: RMV-29-27

Location QtrQtr: NENW Section: 27 Township: 6S Range: 94W Meridian: 6

County: GARFIELD Field Name: RULISON

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

Location(s)

| Location ID | Location Name and Number |
|-------------|--------------------------|
| 335191      | CLOUGHT-66S94W 27NENW    |

OGDP(s)

No OGDP

**WELL LOCATION CHANGE OR AS-BUILT GPS REPORT**

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

\* Well Location Change requires a new Plat.

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

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

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

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

**WELL LOCATION CHANGE**

Well plan is: \_\_\_\_\_ (Vertical, Directional, Horizontal)

|  |                                  |                                  |                                   |                                  |
|--|----------------------------------|----------------------------------|-----------------------------------|----------------------------------|
| Change of <b>Surface</b> Footage <b>From</b> : | <input type="text" value="470"/> | <input type="text" value="FNL"/> | <input type="text" value="1430"/> | <input type="text" value="FWL"/> |
| Change of <b>Surface</b> Footage <b>To</b> :   | <input type="text"/>             | <input type="text"/>             | <input type="text"/>              | <input type="text"/>             |

|   |  |                                     |                                     |  |   |
|---|--|-------------------------------------|-------------------------------------|--|---|
| Current <b>Surface</b> Location <b>From</b> | QtrQtr <input type="text" value="NENW"/> | Sec <input type="text" value="27"/> | Twp <input type="text" value="6S"/> | Range <input type="text" value="94W"/> | Meridian <input type="text" value="6"/> |
| New <b>Surface</b> Location <b>To</b>       | QtrQtr <input type="text"/>              | Sec <input type="text"/>            | Twp <input type="text"/>            | Range <input type="text"/>             | Meridian <input type="text"/>           |

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

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

\*\*

Current **Top of Productive Zone** Location

Sec

Twp

Range

New **Top of Productive Zone** Location

Sec

Twp

Range

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

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

\*\*

Current **Base of Productive Zone** Location

Sec

Twp

Range

New **Base of Productive Zone** Location

Sec

Twp

Range

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

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

\*\*

Current **Bottomhole** Location

Sec

Twp

Range

\*\* attach deviated drilling plan

New **Bottomhole** Location

Sec

Twp

Range

**SAFETY SETBACK INFORMATION**

Required for change of Surface Location.

Distance from Well to nearest:

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

**INSTRUCTIONS:**

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

**SUBSURFACE MINERAL SETBACKS**

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

Is this Well within a unit? \_\_\_\_\_

If YES:

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

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

If NO:

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

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

**Exception Location**

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

**LOCATION CHANGE COMMENTS**

**CHANGE OR ADD OBJECTIVE FORMATION AND/OR SPACING UNIT**

| <u>Objective Formation</u> | <u>Formation Code</u> | <u>Spacing Order Number</u> | <u>Unit Acreage</u> | <u>Unit Configuration</u> | Add | Modify | No Change | Delete |
|----------------------------|-----------------------|-----------------------------|---------------------|---------------------------|-----|--------|-----------|--------|
| WILLIAMS FORK - CAMEO      | WFCM                  | 139-27                      | 320                 | W2                        |     |        | X         |        |

**OTHER**

**RULE 502 VARIANCE**

Order Number: \_\_\_\_\_

Description:

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

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

From: Name CLOUGH Number RMV-29-27 Effective Date: \_\_\_\_\_

To: Name \_\_\_\_\_ Number \_\_\_\_\_

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

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

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

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

OIL & GAS LOCATION ID Number: \_\_\_\_\_

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

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

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

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

**DIGITAL WELL LOG UPLOAD**

**DOCUMENTS SUBMITTED** Purpose of Submission: \_\_\_\_\_

**COMPLIANCE with CONDITION OF APPROVAL (COA) on** Form NO: \_\_\_\_\_ Document Number: \_\_\_\_\_

**RECLAMATION**

**INTERIM RECLAMATION**

Interim Reclamation will commence approximately \_\_\_\_\_

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

Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

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

**FINAL RECLAMATION**

Final Reclamation will commence approximately \_\_\_\_\_

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

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

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

Route to the Area Reclamation Specialist

Comments:

**ENGINEERING AND ENVIRONMENTAL WORK**

REPORT OF TEMPORARY ABANDONMENT

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

REQUEST FOR TEMPORARY ABANDONMENT EXCEEDING 6 MONTHS

State the reason for the extension request and explain the Operator's plans for future operation of the Well in the COMMENTS box below as required by Rule 434.b.(3).

Date well temporarily abandoned \_\_\_\_\_

Has Production Equipment been removed from site? \_\_\_\_\_

Mechanical Integrity Test (MIT) required. Date of last MIT \_\_\_\_\_

**TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK**

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

NOTICE OF INTENT/REQUEST FOR APPROVAL      Approximate Start Date    09/16/2025

SUBSEQUENT REPORT      Date of Activity \_\_\_\_\_

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

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

Pit ID \_\_\_\_\_ Pit Name \_\_\_\_\_

(No Sample Provided)

Subsequent well operations with heavy equipment (Rule 312)

(No Well Provided)

COMMENTS:

TEP Rocky Mountain LLC (TEP) is requesting ECMC approval to revise the existing bradenhead pressure management plan (PMP) and connect the CLOUGH RMV 29-27 bradenhead to a combustor. This request to revise the existing PMP resulted from ECMC engineering staff Document Number 402805276, which had allowed TEP to manage the bradenhead pressure via a connection to the sales line in combination with increasing the bradenhead threshold pressure based on fluid level measurements.

Per ECMC Operator Guidance, the following lines of evidence continue to demonstrate conclusively that the CLOUGH RMV 29-27 has both casing integrity and wellbore isolation:

- During the most recent bradenhead test performed on April 25,2025 the bradenhead pressure decreased to 0 psi within five minutes through a two-inch valve with a de minimis volume of gas, while the production casing pressure increased slightly.
- Monthly pressure monitoring for the previous twelve months confirms that the bradenhead pressure and production casing pressure have maintained an average differential pressure of 100 psi. The previous twelve months of monthly pressure monitoring data is included as an attachment.
- A review of the cement bond log for the subject well indicates cement coverage up to or above 4,050 feet, which is at least 1,250 feet above the top perforation located at 5,305 feet, therefore providing cement isolation of the producing zone from the production casing annulus.
- The most recent analytical results of the production gas indicate a concentration of 1.3% carbon dioxide and 91.4% methane versus concentrations of 0.02% carbon dioxide and 95.1% methane in the bradenhead gas sample. The analytical results of these samples were submitted to the ECMC via a Form 43 (4043386609).

TEP is requesting ECMC approval to revise the existing bradenhead PMP for the CLOUGH RMV 29-27 and connect the bradenhead to the combustor. The bradenhead connection to the combustor will effectively manage the bradenhead pressure and maintain a consistent bradenhead pressure below the ECMC calculated threshold pressure. This well has federal involvement, so TEP will also be requesting BLM approval prior to modifying the existing PMP

GAS CAPTURE

VENTING AND FLARING:

Operation type: \_\_\_\_\_ Operational phase requiring venting/flaring: \_\_\_\_\_

Reason for venting/flaring: \_\_\_\_\_

Describe Other reason for venting/flaring:

\_\_\_\_\_

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

\_\_\_\_\_

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

\_\_\_\_\_

Total volume of gas vented or flared: \_\_\_\_\_ mcf  estimated  measured

Total duration of emission event: \_\_\_\_\_ hours  consecutive  cumulative

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

Sample Site Facility ID#: \_\_\_\_\_

GAS CAPTURE PLAN

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

\_\_\_\_\_

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

CASING PROGRAM

(No Casing Provided)

POTENTIAL FLOW AND CONFINING FORMATIONS

H2S REPORTING

- Intentional release of H2S gas due to Upset Condition or malfunction.
- Intent to temporarily abandon well with potential H2S concentration >100 ppm.

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

**Gas Analysis Report must be attached.**

H2S Concentration: \_\_\_\_\_ in ppm (parts per million)

Date of Measurement or Sample Collection \_\_\_\_\_

Description of Sample Point:

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

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

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

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

COMMENTS:

**OIL & GAS LOCATION UPDATES**

OGDP ID \_\_\_\_\_ OGDP Name \_\_\_\_\_

**SITE EQUIPMENT LIST UPDATES**

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

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

**OTHER PERMANENT EQUIPMENT UPDATES**

**OTHER TEMPORARY EQUIPMENT UPDATES**

**CULTURAL AND SAFETY SETBACK UPDATES**

**OTHER LOCATION CHANGES AND UPDATES**

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

[Empty text box for other location changes and updates]

**POTENTIAL OGDG UPDATES**

**PROPOSED CHANGES TO AN APPROVED OGDG**

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

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

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

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

[Empty text box for detailed description of changes]

**Operator Best Management Practices**

**No BMP/COA Type**

**Description**

|  |  |
|--|--|
|  |  |
|--|--|

Operator Comments:

[Empty text box for operator comments]

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

Signed: \_\_\_\_\_ Print Name: Dasa Bryan

Title: Regulatory Admin Email: [dasa.bryan@flywheelenergy.com](mailto:dasa.bryan@flywheelenergy.com) Date: \_\_\_\_\_

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

ECMC Approved: \_\_\_\_\_ Date: \_\_\_\_\_

**CONDITIONS OF APPROVAL, IF ANY LIST**

**COA Type**

**Description**

|       |  |
|-------|--|
| 0 COA |  |
|-------|--|

**General Comments**

**User Group**

**Comment**

**Comment Date**

|  |  |                     |
|--|--|---------------------|
|  |  | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)

**ATTACHMENT LIST**

**Att Doc Num**

**Name**

| <b><u>Att Doc Num</u></b> | <b><u>Name</u></b> |
|---------------------------|--------------------|
|                           |                    |

Total Attach: 0 Files