

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

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CUMULATIVE IMPACTS DATA IDENTIFICATION

Per Rule 303, this form and all required components and attachments will be submitted for any Oil and Gas Development Plan.

Form Type: **OGDP** **Partial 2B - Rule 803.b.(2).A UIC Conversion**

OPERATOR INFORMATION

ECMC Operator Number: <u>10633</u>	Contact Name and Telephone:
Name of Operator: <u>CRESTONE PEAK RESOURCES OPERATING LLC</u>	Name: <u>Jeff Annable</u>
Address: <u>555 17TH STREET SUITE 3700</u>	Phone: <u>(303) 312-8529</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>dlockiespermitting@civiresources.com</u>

OIL & GAS DEVELOPMENT PLAN INFORMATION

Oil & Gas Development Plan Name: Bennett D OGD

Oil & Gas Development Plan Docket #: 241100269 Oil & Gas Development Plan ID #: Data not required

This OGD is included in a Comprehensive Area Plan. CAP ID #: _____

OIL & GAS LOCATION DATA

1 Oil & Gas Location Name: Bennett D Number: Pad Status: Proposed

OIL & GAS LOCATION INFORMATION

Form 2A Doc#: 403944406

Loc ID#: _____

Oil & Gas Location: QTRQTR: SWSE Sec: 34 Twp: 3S Rng: 64W Meridian: 6

Total number of wells planned: 26

Operations Duration

Estimated total number of weeks to construct this Oil & Gas Location: 8

Estimated total number of weeks to drill all planned wells for this Oil & Gas Location: 22

Number of planned drilling occupations to drill all planned wells for this Oil & Gas Location: 2

Estimated total number of weeks to complete all planned wells for this Oil & Gas Location: 26

Number of planned completions occupations to complete all planned wells for this Oil & Gas Location: 2

Will there be simultaneous drilling and completions operations occurring at this Oil & Gas Location? No

Estimated total number of months the Oil & Gas Location will be active, prior to abandonment and reclamation: 360

Noise Impacts

Provide a qualitative evaluation of the incremental adverse noise impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

The sound originating from the development will result in minimal increases in ambient noise during the development phase of this project as a result of the sound mitigation measures proposed. Sound modeling further discussed in the Sound Mitigation plan attached to the Form 2A shows that there will be minimal increase in ambient noise to the potential receptors within 2000' of the location during the pre-production phase of the proposed project.

Provide a qualitative evaluation of the incremental adverse noise impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

The sound originating from the proposed development should not result in a noticeable change by potential receptors during the production stages as most of the permanent production equipment is currently exists on location. Sound modeling further discussed in the Sound Mitigation plan attached to the Form 2A shows that there will be minimal to no increase in ambient noise to the potential receptors during the production phase of the proposed development.

Light Impacts

Provide a qualitative evaluation of the incremental adverse light impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

The light originating from the location during the development phase should result in a minimal increase in ambient lighting. The proposed best management practices, such as the sound wall and downcast lighting work to minimize these potential light impacts. Light modeling further discussed in the Light Mitigation plan attached to the Form 2A shows this minimal increase in ambient lighting to potential receptors.

Provide a qualitative evaluation of the incremental adverse light impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

The light originating from the location during the production phase should result in a minimal to no increase in ambient lighting. There will be no permanent lighting on the proposed location and the minimal nighttime truck traffic for production operations helps to eliminate potential light impacts during production operations. Light modeling further discussed in the Light Mitigation plan attached to the Form 2A shows this minimal to no increase in ambient lighting to potential receptors.

Odor Impacts

Provide a qualitative evaluation of the incremental adverse odor impacts to the surrounding receptors during the pre-production activities at this Oil & Gas Location.

A temporary and intermittent increase(s) in odor may be expected due to equipment exhaust and fluid management during drilling and completions operations. Operator plans to utilize best management practices outlined in the odor mitigation plan to minimize the odor impacts experienced by nearby receptors. These mitigations include utility powered drilling rig and Group III drilling fluids.

Provide a qualitative evaluation of the incremental adverse odor impacts to the surrounding receptors during the production stage of this Oil & Gas Location.

There should rarely be any odor originating from the location during the production phase since the location will have instrument air pneumatics, a maintenance vessel, and will be tankless.

WATER RESOURCES

This Oil & Gas Location is listed as a sensitive area for water resources.

This Oil & Gas Location is within 2,640 feet of a surface Water of the State.

Estimated depth to groundwater: 42

Estimated total planned on-location storage capacity of the Oil & Gas Location for:

	Number of Tanks	Total Volume (bbls)
Oil	<u> 0 </u>	<u> 0 </u>
Condensate	<u> 0 </u>	<u> 0 </u>
Produced Water	<u> 2 </u>	<u>1000</u>
Other volumes of stored fluids, hydrocarbons, chemicals, or E&P Waste Fluids	<u> 4 </u>	<u> 16 </u>

List, with volumes, the "Other" fluids planned to be stored on the Oil & Gas Location, including, but not limited to: hydrocarbons, chemicals, or E&P Waste fluids.

Methanol - 4 bbls
 CI-7511(Corrosion inhibitor) - 4 bbls
 EB-6410(Emulsion Breaker) - 4 bbls
 PS-1052(Paraffin solvent) - 4 bbls

Potential Impacted Surface Water Resources

Provide the distance and direction of the contaminant migration pathway from the Oil & Gas Location to the nearest downstream riparian corridors, wetlands, and surface Waters of the State. Also provide an evaluation of the baseline condition of the nearest downstream riparian corridors, wetlands, and surface Waters of the State.

Enter 2,640 for distances greater than 1/2-mile. Distances are measured along the migration pathway, not a straight line from the edge of the Oil & Gas Location.

	Distance	Direction	Evaluation of Baseline Condition
Riparian Corridor	2640	W	N/A
Wetland	4	W	field verified isolated wetland
Surface Waters of the State	4	W	field verified isolated wetland

Potential Impacts to Public Water Resources

Provide the distance, direction, and evaluation of potential impacts to the nearest Public Water System Intake. Enter 5,280 for distances greater than 1-mile.

	Distance	Direction	Evaluation of Baseline Condition
Public Water System Intake	5280	SW	N/A

Estimated Water Usage

Provide the estimated total volumes of the following that are anticipated to be used during the drilling and completions stage of the Oil & Gas Location activity.

Water Source	Volume (bbls)	Volume (bbls)	Volume (bbls)	Percentage Recycled Water	%
Surface Water	1485000	Recycled Water (Produced Water)	0	Unspecified Source	0
	0				
Ground Water	24500	Recycled Water (non-Produced Water)	0	Total Water Usage	0

If an unspecified water source is planned to be used, provide a description of the source.

N/A

Evaluate the measures being taken to reduce freshwater use, including reusing and recycling produced water.

The applicant is currently assessing the feasibility of incorporating recycled produced water. This evaluation considers both technical limitations and logistical challenges associated with transporting produced/recycled water to the location. If recycled water use becomes technically and logistically viable, the operator will submit the necessary subsequent Sundry Notice for approval.

ECOSYSTEM & WILDLIFE RESOURCES

List High Priority Habitats (HPH) that occur within one mile of the Oil & Gas Location and list the distance from working pad surface. If the location is partially or entirely within a HPH list the distance as '0' and provide the estimated acreage disturbance of that HPH by the location construction.

High Priority Habitat (HPH) Name:	Distance	Estimated Acreage Disturbed
Pronghorn Winter Concentration Area	3564	0

List total size of disturbed acreage and disturbed High Priority Habitat (HPH) area (in acres) during the Oil & Gas Location construction and after interim reclamation.

	Total Acreage (acres)	Total HPH Acreage (acres)	Provide any further information regarding the location's HPH disturbance.
Construction	22.96	0	
Post-interim Reclamation	7.42	0	

Provide the acreage of the existing land use types that occur within one mile of the Oil & Gas Location. Note: a circle with a one mile radius is approximately 2010 acres.

Existing Acreage Existing Acreage

		Existing Acreage		Existing Acreage			
Crop Land:	Irrigated	1828	Non-Irrigated	0	Conservation Reserve Program(CRP)	0	
Non-Crop Land:	Rangeland	660	Forestry	3	Recreation	0	Other 162
Subdivided:	Industrial	240	Commercial	0	Residential	140	

If any land use is industrial, provide a description of the use or operation of the industrial facilities.

Oil midstream facility

If any land use is "Other", provide a description of the land use.

We used the USGS National Land Cover dataset to calculate this acreage 57.6 DEVELOPED, OPEN SPACE; 38.25 DELVELOPED, LOW INTENSITY; 41.59 DEVELOPED, MEDIUM INTENSITY; 18.01 DEVELOPED, HIGH INTENSITY; 6 BARREN LAND; 0.82 OPEN WATER

If any portion of the land use for the proposed oil and gas location includes Rangeland, Forestry, or Recreation, provide a list of the plant community or communities and estimated acreage disturbed for each:

	Estimated Disturbed Acreage		Estimated Disturbed Acreage		Estimated Disturbed Acreage		Estimated Disturbed Acreage
Disturbed Grassland	22.96	Shrub Land	0	Mountain Riparian	0	Wetland Aquatic	0
Native Grassland	0	Plains Riparian	0	Forest Land	0	Alpine	0

Provide a qualitative evaluation of incremental adverse impacts to ecosystems, including any plant communities, as a result of Oil and Gas Operations associated with the proposed Oil & Gas Location.

N/A

Soil Resources

List all soil map units that occur within the Oil & Gas Location and list the estimated total area (in acres) disturbance of each soil map unit.

NRCS Map Unit Name:	Estimated Disturbed Acreage
Ascalon-Platner association (0 to 5 percent slopes)	22.23
Truckton loamy sand (3 to 9 percent slopes)	0.73

PUBLIC WELFARE

This Oil & Gas Location lies within a Disproportionately Impacted Community as defined in the 100-series rules.

Building Units within 1-mile

0'-2,000' 2,001'-5,280'

Total number of Residential Building Units:	2	10
Total Number of non-school AND non child care center High Occupancy Building Units:	0	0
Total number of School Facilities:	0	0
Total number of Child Care Centers:	0	0

Recreation and Scenic Value

List all State Parks, State Trust Lands, or State Wildlife Area within 1-mile of the Oil & Gas Location.

N/A

List all Designated Outdoor Activity Areas within 1-mile of the Oil & Gas Location.

N/A

List all mapped trails that support any of the following recreational activities within 1-mile of the Oil & Gas Location: Hiking, Biking, Horseback Riding, Motorcycle Riding, ATV Riding, OHV, Nordic Skiing, Snowmobiling, or Snowshoeing.

N/A

AIR RESOURCES

Pre-Production Emissions

Complete the following chart based on the estimated total equipment emissions (in tons) for the Oil & Gas Location during the pre-production (construction, drilling, completions) stage for Criteria Pollutants by equipment type.

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Process Heaters or Boilers	2.23	0.56	0.02	0.01	0	0	0.03
Storage Tanks	0.01	0.06	0.23	0	0	24.34	0
Venting or Blowdowns	0	0	0.7	0.99	0.33	0.06	0
Combustion Control Devices	0.01	0.07	0.16	0.23	0.08	27	0
Non-Road Internal Combustion Engines	189.82	165.9	30.86	1.33	0	32825.91	0.27
Drill Mud	0	0	5.33	7.58	2.53	0.45	0
Flowback or Completions	0	0	0	0	0	13.82	0
Loadout	0	0	0	0	0	0	0

Production Emissions

Complete the following chart based on the estimated full facility equipment emissions (in tons) for the Oil & Gas Location once the Oil & Gas Location has entered the production stage, for Criteria Pollutants. The table should be filled out based on ONE year of operation.

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Stationary Engines or Turbines	0	0	0	0	0	0	0
Process Heaters or Boilers	8.37	7.03	0.46	0.19	0.27	10048.24	0.18
Storage Tanks	2.5	11.39	1.36	0	0	267.72	0
Dehydration Units	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0
Separators	0	0	0	0	0	0	0
Fugitives			0.74	0.85	0.28	0.05	
Venting or Blowdowns	0	0	0.19	0.27	0.09	0.02	0
Combustion Control Devices	0.02	0.09	0.22	0.32	0.11	37.91	0
Loadout	0.19	0.92	8.67	0	0	347.24	0
Non-Road Internal Combustion Engines	0	0	0	0	0	0	0
Well Bradenhead	0	0	0.13	18.91	6.32	1.12	0
Well Maintenance	0	0	0	0	0	0	0

Diesel Vehicle Road Miles

Complete the following chart for diesel vehicle road miles during each stage of oil and gas location operations.

During Construction: 63810 During Completions: 829860
 During Drilling: 252000 During Interim Reclamation: 25470
 During Production: 41425

PUBLIC HEALTH RESOURCES

Pre-Production Emissions

Complete the following chart based on the estimated total equipment emissions (in lbs) for the Oil & Gas Location during the pre-production (construction, drilling, completions) stage for Hazardous Air Pollutants (HAP).

	BEN	TOL	ETH	XYL	NHE	TMP	H2S	FDE	MET	HAP
Process Heaters or Boilers	0.05	1.38	0.01	0.02	0	0	0	13.59	0	15.06
Storage Tanks	0	0	0	0	0	0	0	0	0	0
Venting or Blowdowns	2.42	1.03	0.07	0.15	0	0.02	0	0	0	3.68

Combustion Control Devices	0.55	0.24	0.02	0.03	4.1	0	0	0	0	4.94
Non-Road Internal Combustion Engines	314.81	114.93	0	78.99	0	0	0	90.8	0	599.53
Drill Mud	18.49	7.87	0.54	1.17	136.93	0.13	0	0	0	165.12
Flowback or Completions	0	0	0	0	0	0	0	0	0	0
Loadout	2.78	0	0	0	24.12	0	0	0	0	26.9

Production Emissions

Complete the following chart based on the estimated total equipment emissions (in lbs) for the Oil & Gas Location once the Oil & Gas Location has entered the production stage, for Hazardous Air Pollutants (HAP). The table should be filled out based on ONE year of operation.

	BEN	TOL	ETH	XYL	NHE	TMP	H2S	FDE	MET	HAP
Stationary Engines or Turbines	0	0	0	0	0	0	0	0	0	0
Process Heaters or Boilers	0.35	0.57	0	0	301.45	0	0	12.56	0	314.93
Storage Tanks	120.85	68.3	5.5	16.3	72.61	0.35	0	0	0	283.92
Dehydration Units	0	0	0	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0	0	0	0
Separators	0	0	0	0	0	0	0	0	0	0
Fugitives	4.26	5.25	0.62	4.68	25.96	0.16	0	0	0	40.92
Venting or Blowdowns	0.65	0.28	0.02	0.04	0	0	0	0	0	1
Combustion Control Devices	0.78	0.33	0.02	0.05	5.75	0.01	0	0	0	6.94
Non-Road Internal Combustion Engines	0	0	0	0	0	0	0	0	0	0
Loadout	30.57	0	0	0	265.3	0	0	0	0	295.87
Well Bradenhead	46.09	19.61	1.35	2.91	341.38	0.33	0	0	0	411.68
Well Maintenance	0	0	0	0	0	0	0	0	0	0

Provide a qualitative evaluation of any potential acute or chronic, short- or long-term incremental impacts to public health as a result of the estimated total pre-production hazardous air pollutant emissions.

In 2019, Crestone hired a third-party expert from CTEH, LLC, to design and perform studies to characterize the short-term impacts on local air quality and public health from discrete operational phases at four oil and natural gas well pads being developed in Weld County, Colorado. It is important to note that Crestone is using similar technologies and practices for the Bennett D Pad as was used in the four locations in the studies. The specific goals of this project were to: (1) collect a high-resolution data set of chemical concentrations in air near the well pad and the surrounding communities; and (2) evaluate the impact on risks to public health, if any, from the release of oil and gas-related compounds into the air during specific operational phases of well development. CTEH conducted real-time air monitoring for total VOCs, hydrogen sulfide, H₂S, particulate matter, PM and specific VOCs (such as benzene), simultaneously with other measurements. As the report states in its Executive Summary: More than 5,000 total measurements were collected in real-time by CTEH personnel in the communities surrounding the well pads over a period of 26 days. Additionally, 20 analytical samples were collected from four locations around the Aspen 3-65 15-14 South well pad to evaluate potential community exposures over 5 days of flowback activities. Approximately 99% of the real-time VOC measurements recorded in the communities were Non detections, which means that VOCs were not present or that VOC concentrations were less than the instrument detection limit of 1 ppb [part per billion] for VOCs. This detection limit is well below the federal (ATSDR [Agency for Toxic Substances and Disease Registry]) health guideline level for short-term adverse health effects for benzene (9 ppb). Of the over 1,500 measurements collected for benzene specifically or VOCs in general, just one reading was at a detectable level but did not exceed public health guideline values for the BTEX compounds. No H₂S was ever detected [at a detection limit of 0.1 part per million], and just one of over 1,500 readings taken for PM, taken on along a dirt road, was higher than typical background values. In the 20 analytical air samples collected in the surrounding community during flowback, the maximum measured concentrations for BTEX compounds were also all 10 to 13,000-times lower than their respective federal acute health guideline values. The real-time and analytical data indicate no adverse health risks to nearby communities, including sensitive individuals, from cumulative exposures to VOCs that may be emitted from pre-production and production activities at Crestone well pads. Since Crestone is planning to use similar practices and technologies for the Bennett D Pad as was used in the four locations in Weld County, we expect similar outcomes here.

Provide a qualitative evaluation of any potential acute or chronic, short- or long-term incremental impacts to public health as a result of the estimated annual production hazardous air pollutant emissions.

In 2019, Crestone hired a third-party expert from CTEH, LLC, to design and perform studies to characterize the short-term impacts on local air quality and public health from discrete operational phases at four oil and natural gas well pads being developed in Weld County, Colorado. It is important to note that Crestone is using similar technologies and practices for the Bennett D Pad as was used in the four locations in the studies. The specific goals of this project were to: (1) collect a high-resolution data set of chemical concentrations in air near the well pad and the surrounding communities; and (2) evaluate the impact on risks to public health, if any, from the release of oil and gas-related compounds into the air during specific operational phases of well development. CTEH conducted real-time air monitoring for total VOCs, hydrogen sulfide, H₂S, particulate matter, PM and specific VOCs (such as benzene), simultaneously with other measurements. As the report states in its Executive Summary: More than 5,000 total measurements were collected in real-time by CTEH personnel in the communities surrounding the well pads over a period of 26 days. Additionally, 20 analytical samples were collected from four locations around the Aspen 3-65 15-14 South well pad to evaluate potential community exposures over 5 days of flowback activities. Approximately 99% of the real-time VOC measurements recorded in the communities were Non detections, which means that VOCs were not present or that VOC concentrations were less than the instrument detection limit of 1 ppb [part per billion] for VOCs. This detection limit is well below the federal (ATSDR [Agency for Toxic Substances and Disease Registry]) health guideline level for short-term adverse health effects for benzene (9 ppb). Of the over 1,500 measurements collected for benzene specifically or VOCs in general, just one reading was at a detectable level but did not exceed public health guideline values for the BTEX compounds. No H₂S was ever detected [at a detection limit of 0.1 part per million], and just one of over 1,500 readings taken for PM, taken on along a dirt road, was higher than typical background values. In the 20 analytical air samples collected in the surrounding community during flowback, the maximum measured concentrations for BTEX compounds were also all 10 to 13,000-times lower than their respective federal acute health guideline values. The real-time and analytical data indicate no adverse health risks to nearby communities, including sensitive individuals, from cumulative exposures to VOCs that may be emitted from pre-production and production activities at Crestone well pads. Since Crestone is planning to use similar practices and technologies for the Bennett D Pad as was used in the four locations in Weld County, we expect similar outcomes here.

Dust Impacts

The following are the estimated number of truck trips traveling on or off the Oil & Gas Location.

Total	During Construction	During Drilling	During Completions	During Interim Reclamation	During Production
Monthly	<u>718</u>	<u>730</u>	<u>2730</u>	<u>287</u>	<u>138</u>
Annual	<u>1418</u>	<u>4200</u>	<u>27662</u>	<u>566</u>	<u>1656</u>

Estimated total pounds (lbs) of proppant to be used during completions activities. 3630000
00

Provide the type of proppant(s) that are planned to be used during completions activities.

Proppant will be mix of Colorado and Wyoming locally mined proppant and Northern White Proppant.

Provide an evaluation of the proposed proppant management system that will be used to minimize dust during completions activities, including the estimated amount of silica dust that will leave the Oil & Gas Location.

Crestone uses a gravity fed box proppant delivery system, 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 control to meet OSHA requirements. This approach eliminates the noise and dust associated with the transfer of sand using pneumatic trailers. With this approach, truck trips and sand handling are reduced, thereby reducing dust on and off the well pad. The transfer from the container to the blender is accomplished using gravity flow and conveyors, a much cleaner and quieter process. With a gravity fed proppant delivery system, the 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. As a result of the gravity fed box proppant delivery system, Crestone does not anticipate any silica dust to migrate off of the Bennett D Pad during completion operations.

EXISTING OIL & GAS

Total number of oil & gas locations within 1-mile of the Oil & Gas Location:

	Total Number of Locations	Total Number of Wells
Active, built	<u>2</u>	Active, built <u>8</u>
Permitted by ECMC, unbuilt	<u>0</u>	Permitted by ECMC, unbuilt <u>0</u>
Permitted by Relevant Local Government & not ECMC, unbuilt	<u>0</u>	Proposed <u>0</u>
Proposed	<u>0</u>	Plugged and Abandoned <u>1</u>

Total acreage disturbance during construction of the active and proposed oil & gas locations within 1-mile of the proposed Oil & Gas Location: 8.86

Source for acreage total:

- Field Observation/Measurement
- ECMC Location Files
- Aerial Photos/Other

Other

If "Other" is selected, please describe the source use to determine the acreage total for construction disturbance of the active and proposed oil & gas locations within 1-mile of the proposed Oil & Gas Location.

Total permitted capacity of on-location storage (in number of pits and tanks) of the active and proposed oil & gas locations within 1-mile of the Oil & Gas Location :
NOTE: providing the existing number of pits and tanks on surrounding existing locations is optional.

Source for storage totals:		Permitted Onsite Storage Capacity	Existing Onsite Storage Capacity
<input type="checkbox"/> Field Observation/Measurement	Oil	8	8
<input checked="" type="checkbox"/> ECMC Location Files	Condensate	0	0
<input checked="" type="checkbox"/> Aerial Photos/Other	Produced Water	4	4
<input type="checkbox"/> Other	Pits	0	0

If "Other" is selected, please describe the source use to determine the tank totals for the active and proposed oil & gas locations within 1-mile of the proposed Oil & Gas Location.

OIL & GAS DEVELOPMENT PLAN-SCALE DATA

List High Priority Habitats (HPH) that are estimated be disturbed by the construction of new roads, including access roads, pipelines, and utilities for this OGDG, along with the estimated disturbed acreage of each HPH.

No HPH Identified

List the total estimated of disturbed acreage and the total disturbed High Priority Habitat (HPH) area (in acres) during construction and the acreage that will remain disturbed after interim reclamation of the following for the entire OGDG:

	Construction		Post-interim Reclamation	
	Total Acreage (acres)	Total HPH Acreage (acres)	Total Acreage (acres)	Total HPH Acreage (acres)
New roads, including access roads	0	0	New roads, including access roads	0
Pipelines	0	0	Pipelines	0
Utilities	0	0	Utilities	0

Provide any further information regarding the HPH disturbance from the construction of new roads, including access roads, pipelines, and utilities for this OGDG.

N/A

Number of miles of the existing lease road that are planned to be used to access these location(s): 0.4

BENEFICIAL IMPACT INFORMATION

Equipment and Facility Removal

Total number of existing wells that are planned to be plugged and abandoned as part of this OGDG: 0

Total number of existing locations that are planned to be closed and undergo final reclamation as part of this OGDG: 0

Total number of acres that are planned to be reclaimed through the closing of existing locations: 0

Total number of existing pits that are planned to be closed and undergo final reclamation as part of this OGDG: 0

Total number of tanks planned to be removed from existing locations through the approval of this OGDG:

Oil Tanks: 0

Condensate Tanks: 0

Produced Water Tanks: 0

Estimated number of vehicle trips that are planned to be prevented from the above mentioned facility closures and equipment upgrades (on an annual basis): 0

Provide a qualitative evaluation of any incremental beneficial impacts to the surrounding community directly and indirectly from this OGDG.

The proposed File OGDG will have beneficial impacts on the surrounding communities. These beneficial impacts include but are not limited to the following: provide a reliable domestic energy source; employ Colorado residents during all phases of operations; generate tax revenue and the payment of fees to local and state agencies; and provide royalty income to mineral interest owners.

Provide a qualitative evaluation of any incremental beneficial impacts to the surrounding wildlife and ecosystems directly and indirectly from this OGDG.

The proposed File OGDG will utilize buried pipelines to transport production from the Oil & Gas Location to the local markets. The use of oil pipeline in lieu of trucking oil will significantly reduce the truck traffic typically needed to support production operations. The massive reduction in truck traffic will markedly reduce the likelihood of interactions between wildlife and vehicular traffic associated with the proposed development. Further, adverse impacts to ecosystems are not anticipated.

MITIGATION INFORMATION

Item	Impacted Resource	Mitigation Description
1	Air Resources	<p>CONSTRUCTION</p> <ul style="list-style-type: none"> o Use of freshwater to minimize the generation and transportation of dust. o Use existing access point to minimize construction time. <p>DRILLING</p> <ul style="list-style-type: none"> o Employ pipe cleaning procedures when removing drill string from hole. o Utilize closed-loop, pit-less fluid management system. o Use of freshwater to minimize the generation and transportation of dust. o Use a drilling rig powered by utility power. <p>COMPLETIONS</p> <ul style="list-style-type: none"> o Utilize Tier IV or equivalent rated completions equipment. o Employ the practice of block and isolate whenever possible on equipment, piping, and/or tank connections. o Use of sealed containers (e.g., sandboxes) for the storage and transportation of sand used in hydraulic fracturing. o Use of freshwater to minimize the generation and transportation of dust. o Any gas encountered during drill-out will be combusted with a minimum of 98% destruction efficiency. o Any fluids encountered during drill-out or flowback will be sent to permanent production equipment. o Any gas encountered during flowback will be routed to a gas sales pipeline or combusted with a minimum of 98% destruction efficiency. <p>PRODUCTION</p> <ul style="list-style-type: none"> o Operator will use oil and gas pipelines. o Instrument air skids will be used to generate compressed air for all pneumatic actuation. o Operator will utilize a pressurized maintenance vessel during maintenance operations. o Operator will utilize a tankless location design. o Operator will electrify all permanent production facilities. o Wells, facilities, and equipment will be equipped to be shut-in remotely
2	Water Resources	<p>SURFACE WATER PROTECTION</p> <ul style="list-style-type: none"> o Installation of polyethylene liner on location during drilling and completions operations. o Installation of an engineered containment system around/beneath production facilities. o Development of a site-specific SPCC plan. <p>GROUNDWATER PROTECTION</p> <ul style="list-style-type: none"> o Installation of polyethylene liner on location during drilling and completions operations. o Installation of an engineered containment system around/beneath production facilities. o Development of a site-specific SPCC plan.
3	Ecosystem and Wildlife Resources	<p>TERRESTRIAL SPECIES</p> <ul style="list-style-type: none"> o Operator will conduct additional avian surveys prior to the commencement of construction to ensure no conflicts have developed since the prior survey(s). <p>AQUATIC SPECIES</p> <ul style="list-style-type: none"> o Installation of polyethylene liner on location during drilling and completions operations. o Installation of an engineered containment system around/beneath production facilities.

4	Soil Resources	<p>TOPSOIL</p> <ul style="list-style-type: none"> o Topsoil will be stockpiled on location with slopes not greater than 4:1 o Topsoil stockpiles will be stabilized with appropriate vegetation to provide both short and long-term stabilization to prevent erosion.
5	Public Health Resources	<p>NOISE</p> <ul style="list-style-type: none"> o Sound walls (32' high) will be constructed around the perimeter of the location to enhance sound attenuation and retard sound propagation. o Continuous noise monitoring terminals will be placed proximal to residential building units to monitor sound levels. o A "quiet completions fleet" will be used for hydraulic fracturing operations. o Permanent production facility will be powered by grid power. <p>LIGHT</p> <ul style="list-style-type: none"> o Lighting will be angled in a downward manner to limit the halo effect off location. o Lights will be placed at reasonable heights to limit spillage off location. o Sound walls (32' high) will be constructed around the perimeter of the pad and aid in minimizing lighting impacts to surrounding receptors. o No lighting will be present on the permanent production facility. <p>ODOR</p> <ul style="list-style-type: none"> o Utilization of a closed-loop fluids management system. o Use of IOGP Group III drilling fluids. o Remove drilling cuttings daily. o Odor-mitigating additives will be incorporated into drilling fluids, if necessary. o Employ pipe-cleaning procedures when removing drill pipe from wellbore. o Permanent production facility will be powered by grid power. o Instrument air system for pneumatics. o Closed Loop Maintenance via a dedicated pressurized maintenance vessel. o The proposed location will be tankless. <p>DUST</p> <ul style="list-style-type: none"> o Freshwater will be used as a dust suppressant when necessary on the pad and access road. o Mud-tracking devices will be incorporated on the road access before the apron. <p>RECREATION & SCENIC VALUES</p> <ul style="list-style-type: none"> o Equipment will be painted "desert tan" (or similar) to avoid creating a marked contrast with the surrounding landscape.

OPERATOR COMMENTS AND SUBMITTAL

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Title: Regulatory Advisor

Email: dlockiespermitting@civiresources.com

Date: 11/22/2024

Based on the information provided herein, this Cumulative Impacts Data Identification Form 2B complies with ECMC Rules and is hereby accepted into the Cumulative Impacts Data Evaluation Repository (CIDER database).
Contact OGLA Staff for consultation.

ECMC Approved: 

Director of ECMC

Date: 10/2/2025

ATTACHMENT LIST

Att Doc Num

Name

403951729

Form 02B SUBMITTED

Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

OGLA	OGDP ID# 490857 and this Form are approved by Commission Order Number 535-1561.	10/02/2025
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	07/10/2025

Total: 2 comment(s)