

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

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|                                      |    |    |    |
|--------------------------------------|----|----|----|
| DE                                   | ET | OE | ES |
| Document Number:<br><u>404441295</u> |    |    |    |
| Date Received:<br><u>11/21/2025</u>  |    |    |    |

**SUNDRY NOTICE**

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

|   |  |
|---|--|
| ECMC Operator Number: <u>96850</u>                        | Contact Name <u>Mackenzie Barmore</u>              |
| Name of Operator: <u>TEP ROCKY MOUNTAIN LLC</u>           | Phone: <u>(970) 270-2307</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>mackenzie.barmore@flywheelenergy.com</u> |

**FORM 4 SUBMITTED FOR:**

Facility Type: WELL  
 API Number : 05- 045 09961 00 ID Number: 271816  
 Name: FEDERAL Number: RMV 170-19  
 Location QtrQtr: NWSE Section: 19 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 |
|-------------|--------------------------|
| 335368      | FEDERAL-66S94W 19NWSE    |

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 **Surface Footage From:**

Change of **Surface Footage To:**

|                                      |                    |               |               |                  |                    |
|--------------------------------------|--------------------|---------------|---------------|------------------|--------------------|
| Current <b>Surface Location From</b> | QtrQtr <u>NWSE</u> | Sec <u>19</u> | Twp <u>6S</u> | Range <u>94W</u> | Meridian <u>6</u>  |
| New <b>Surface Location To</b>       | QtrQtr <u>  </u>   | Sec <u>  </u> | Twp <u>  </u> | Range <u>  </u>  | Meridian <u>  </u> |

|             |            |             |            |
|-------------|------------|-------------|------------|
| FNL/FSL     |            | FEL/FWL     |            |
| <u>1506</u> | <u>FSL</u> | <u>2234</u> | <u>FEL</u> |
| <u>  </u>   | <u>  </u>  | <u>  </u>   | <u>  </u>  |

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

2221 FSL 2131 FEL

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:**

[ ] FSL [ ] FEL

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:**

2221 FSL 2131 FEL

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**

[ ]



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 \_\_\_\_\_

SUBSEQUENT REPORT      Date of Activity    11/18/2025

|   |  |  |
|---|--|--|
| <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 submitting this Form 4 to satisfy a request from ECMC engineering staff to provide an update regarding the status of a historically approved bradenhead Pressure Management Plan (PMP) and summarize the current well condition. There is no Condition of Approval (COA) associated with this submittal, as this Form 4 submittal was requested by ECMC engineering staff via electronic communications and in-person meetings.

An annual bradenhead test, which included a seven-day shut in of the bradenhead connection to the flowline, was performed on APRIL 19,2025, and the Form 17 reporting the results of this test can be referenced under ECMC Document #404184715.

Since installation, the bradenhead connection to the flowline is effectively managing the bradenhead pressure and maintaining a consistent bradenhead pressure below the Bradenhead Monitoring Area (BMA) threshold pressure of 331 psi. TEP has included the historical monthly pressure data as an attachment.

TEP has completed an additional diagnostic evaluation of the well, and the following lines of evidence continue to demonstrate that the RMV 170-19 has both casing integrity and wellbore isolation:

- The recent bradenhead test results indicate a successful test, and the test results confirm production casing integrity.
- There was a 186-psi pressure differential between the surface casing and the production casing prior to starting the bradenhead test.
- The bradenhead pressure decreased to 0 psi in less than five minutes with a de minimis volume of gas through a two-inch valve.
- The recent analytical results collected August 5,2025, indicated a carbon dioxide concentration of .011% in the production gas sample versus a concentration of 0.009% in the bradenhead sample. The analytical results of the recent bradenhead and production gas samples have been submitted to the ECMC via a Form 43 (#404441324).

TEP will continue to utilize the RMV 170-19 bradenhead connection to the flowline to effectively manage the bradenhead pressure below the BMA threshold pressure as detailed in the previously approved Pressure Management Plan. TEP will also continue to monitor the bradenhead pressures as part of our monthly monitoring and annual testing programs and will report any future bradenhead threshold pressure exceedances as required by Rule

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:

**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.

**Operator Best Management Practices**

**No BMP/COA Type**

**Description**

| <b><u>No BMP/COA Type</u></b> | <b><u>Description</u></b> |
|-------------------------------|---------------------------|
|                               |                           |

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 Date: 11/21/2025

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

ECMC Approved: Katz, Aaron Date: 1/22/2026

## CONDITIONS OF APPROVAL, IF ANY LIST

| <u>COA Type</u> | <u>Description</u>  |
|-----------------|---|
|                 | <p>1. Operator will implement measures to control venting, to protect health and safety, and to ensure that vapors and odors from well operations do not constitute a nuisance or hazard to public welfare.</p> <p>2. Bradenhead gas is not to be vented to the atmosphere; any gas from the Bradenhead will be routed to the specified abatement system. Shut in bradenhead pressure shall not exceed threshold pressure. Operator will implement measures to get an estimate of the gas flow rate and/or volume from the bradenhead.</p> <p>3. No later than 4/29/2026, conduct a bradenhead test, submit a Form 17, and submit a Form 4 Sundry that summarizes current well condition. The well should be shut in for seven days to monitor and collect data to characterize build up pressures prior to conducting the bradenhead test. The sundry should include details of the future plans, sample analysis interpretation, bradenhead test description, and the flow rate information and pressure data.</p> <p>4. If a sample has not been collected from surface casing within the last twenty-four months collect bradenhead gas samples for laboratory analysis. Sampling will comply with Operator Guidance - Bradenhead Testing and Reporting Instructions, Appendix A: Liquid and Gas Sampling. Copies of all final laboratory analytical results will be provided to the ECMC within three months of collecting the samples.</p> <p>If a sample has not been collected from production gas, collect production gas samples for laboratory analysis. Operator may submit a production gas from an adjacent well if on a multi-well pad. Sampling will comply with Operator Guidance - Bradenhead Testing and Reporting Instructions, Appendix A: Liquid and Gas Sampling..</p> |

1 COA

### General Comments

| <u>User Group</u> | <u>Comment</u>  | <u>Comment Date</u> |
|-------------------|---|---------------------|
| Engineer          | <p>Pressure data is attached- Tie in to sales is maintaining the pressure under the threshold</p> <p>Sample Date: 8/5/2025 – Compositional Analysis results are similar</p> <p>Ongoing BH sampling to be completed at 24-month intervals</p> <p>A comparison of CO2 values is included in the Operators BHP summary</p> <p>Flow rate/volume information included in Operator's comments</p> <p>Annual test date is 4/29/2026. Consideration to the review of this form on 1/22/2026 will be given for the 2026 annual update sundry</p> | 01/22/2026          |

Total: 1 comment(s)

### ATTACHMENT LIST

| <u>Att Doc Num</u> | <u>Name</u>                |
|--------------------|----------------------------|
| 404441295          | SUNDRY NOTICE APPROVED-OBJ |
| 404441306          | PRESSURE DATA              |
| 404516207          | FORM 4 SUBMITTED           |

Total Attach: 3 Files