



## **LETTER OF INTRODUCTION**

### **RUSH SOUTH 4-65 29-30 3BH-3DH, 4AH-4DH**

City File No. DA-2012-03

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## **Rush South 4-65 29-30**

**4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH, 4DH  
Oil & Gas Well Permit**

**Northeast of East Yale Avenue and Powhaton Road  
City of Aurora, Arapahoe County, Colorado**

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CVL PROJECT NO. 8.13.0201691  
**Resubmittal October 18, 2019**



## **Project Summary**

Rush South 4-65 29-30 3BH-3DH,4AH-4DH  
City of Aurora DA-2012-03

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### ***Project Location***

ConocoPhillips Company, a Delaware corporation, and its subsidiary Burlington Resources Oil & Gas Company LP, a Delaware limited partnership (Applicant) submits this application for approval of a Site Plan from the City of Aurora, Colorado, a municipal corporation (City) for the expansion of the existing oil and gas facility, Rush #4-65 29-30, located in the southwest corner of Section 28, Township 4 South, Range 65 West. The site is located approximately 3,750 feet south of E. Jewell Avenue and 422 feet east of S. Powhaton Road. Two wells (3AH and 1V) were constructed initially in Phase 1, and seven New Wells (3BH, 3CH, 3DH, 4AH, 4BH, 4CH and 4DH) will be drilled in Phase 2. The northernmost Phase 2 well (3BH) is approximately 1381 feet north of the south section line and 422 feet east of the west section line. The Phase 2 expansion of this Well Site will consist of 14.43 acres of total disturbance as outlined in the detailed Site Plan. Existing topography generally falls from the southwest to the northeast. This Well Site drains to the Coal Creek watershed and lies outside of the floodplain. The landscape is used for planted crops. The Well Site is on land classified as Northeast Plains Medium Density Residential Subarea (NEP-MRES). Please refer to the Context Map (Exhibit 2).

### ***Purpose, Well Site Construction and Access Road***

A 4.7-acre Well Site will be constructed, expanding the existing Rush South Well Site toward the south, in order to support drilling operations for seven (7) additional oil and gas wells. The Well Site will be graded flat (0%) and covered with 6" of granular material to encourage minor stormwater events absorbing into the ground to minimize runoff. The Well Site is designed to locate the wellheads in a cut condition. An existing twenty-three feet (23') wide gravel private road off Jewell Avenue provides access to the project site.

The Well Site will be accessed by a constructed private gravel roadway, approximately 1 mile long and 23 feet wide, connecting to Jewell Ave. The City of Aurora and Applicant have agreed to a plan in which there will be two haul routes: one pre- pipeline installation, and one post-pipeline installation. The pre-oil pipeline haul route will be to proceed East on Jewell Avenue for 4 miles; then North on Watkins Road for 4 miles; then Merge onto I-70 heading West. The post-oil pipeline haul route will be to proceed North on Powhaton Road for 3.9 miles; then East on I-70 Frontage Road for 1 mile before merging onto the Interstate heading West.

The timing of all phases of operations are subject to change due to equipment availability, safety considerations, and weather cooperation. Construction of the Well Site and access road will require approximately 45 days of work. BMPs will be installed to mitigate the earthmoving activities and to stabilize the disturbed surfaces to achieve revegetation. A wildlife fence will be erected around the Well Site and a locked gate and cattle guards will be installed at the access road/Well Site entrance. This fencing, gate, and cattle guard will provide security for the life of the Well Site.

The BMP Site Specific narratives that follow summarize the BMPs listed in Exhibit C of the Operator Agreement between the City of Aurora and ConocoPhillips Company and its subsidiaries,

dated June 5, 2019 with a brief explanation of how the Applicant intends to accomplish the obligation of each specific BMP for the Rush South project.

*Please note that the numbering does not correlate to the individual BMP Operating Agreement numbers.*

1. **Definitions:** The Operator Agreement references the following defined terms that have been used throughout this application: **Residential Building Unit, High Occupancy Building, Construction Phase, Drilling Phase, Completion Phase, Production Phase, and Reclamation Phase.** (see Operator Agreement, Exhibit C, BMP No. 1).
2. **Access Roads:** The access road for the Rush South project uses the same access road as Phase 1 of the Rush 4-65 29-30 3AH well that was drilled in July 2017. The access road was built in June 2017. The final access road alignment was laid out during the civil survey. The route was also based on the surface rights that were granted in the Surface Use Agreement along with the local topography. The access point at the nearest public roadway was determined by sight distances and setbacks from existing intersections. The first one hundred feet (100') was constructed of asphalt. The access road was constructed in conformance with the City's 2016 Roadway Specification Manual. *(See Operator Agreement, Exhibit C, BMP No. 28; Site Plan: General Construction Notes 4&6; Fire Access Road and Pad Construction Note Nos. 1, 2 and 3; and Operations Plan.)*
3. **Air Quality:** Applicant's Environmental Group has been working with City Planning staff (Juliana Berry) to revise an Air Quality Field Wide Plan as well as a Site-Specific Plan pursuant to discussions on September 18, 2019 and submitted with this Application. This comprehensive plan addresses policies and procedures used to evaluate, eliminate capture or minimize all potentially harmful emissions and compliance with all applicable state and federal regulations, including regulations promulgated by Colorado Department of Public Health and Environment, Colorado Oil and Gas Conservation Commission and United States Environmental Protection Agency. Applicant will be working with Apis, Inc., a third-party vendor who manufactures and services the air quality monitoring stations within 500 feet of the Well Site. At least five days prior to oil and gas operations commencing, the background monitoring station(s) will be placed away from and upwind of the emission concern areas. The air quality monitoring stations will provide continuous monitoring throughout the life of the well(s). Vendor will also manually deploy at least one whole-air canister to collect samples for a one-week time span prior to oil and gas operations commencing. *(See Operator Agreement, Exhibit C, BMP No. 15; Air Quality Plan, and Site Plan.)*
4. **Anchoring:** During Drilling and Completion Phases of the Rush South, all equipment requiring anchoring is anchored using surface anchors or removable anchoring systems, no anchors are left behind for future use. During Production Phase, tanks and separation equipment are anchored to the ground using anchors engineered to support the tank and separation equipment and to resist flotation, collapse, lateral movement, or subsidence. The Rush South location is not in a floodplain. *(See Operator Agreement, Exhibit C, BMP No. 41.)*
5. **Automatic Safety Protective Systems and Surface Safety Valves:** The Rush South Well Site will be equipped to operate remotely via the automated safety protective system. This system monitors flowing pressures and other operating parameters which have predetermined threshold values programmed and will remotely shut the well in should certain upset conditions be detected. All vessels and tanks are equipped with high level remote shutdowns to prevent an overflow scenario. Additionally, the automated safety system provides the ability to remotely shut-in wells on demand through operator remote intervention. *(See Operator Agreement, Exhibit C, BMP No. 45 and Operations Plan.)*

6. **Burning:** The Applicant will not allow open burning of debris to occur on the Rush South Well Site or any oil and gas operation, as per City code. This does not include emergency flares. *(See Operator Agreement, Exhibit C, BMP No. 6 and Operations Plan.)*
7. **Chemical Disclosure and Storage:** All hydraulic fracturing chemicals will be disclosed to the Aurora Fire Rescue department. Prior to the bringing of such chemicals onto the Rush South property, the Applicant will make available to the City the storage, containment and disposal method for such chemicals. *(See Operator Agreement, Exhibit C, BMP No. 7 and Operations Plan.)*
8. **Class II Underground Injection Control Wells:** The Applicant will not develop, use, operate, or contract with any third party for the use of any Class II underground injection control wells within the city limits or within a four-mile buffer of the City's existing or planned critical infrastructure. Notwithstanding the four-mile buffer, Applicant may use the Class II underground injection well operated by Expedition Water Solutions located in the SW/ 4 of Section 5, T5SR64W in Arapahoe County. *(See Operator Agreement, Exhibit C, BMP No. 34; and Operations Plan.)*
9. **Closed-Loop Pitless System for the Containment and/or Recycling of Drilling Fluids:** The Rush South wells will be drilled, completed and operated using closed-loop pitless systems for containment and/or reuse of all drilling, completion, flowback and produced fluids. Applicant will reuse fluids to the maximum extent practicable, with the City's understanding that Applicant is limited in its ability to reuse all fluids. All above ground storage, including tanks and separators, for use during drilling, completion, flowback and other produced fluids will have secondary containment. The secondary containment system used around the tank battery is an engineered steel panel containment wall with a full impermeable synthetic liner under all tanks and up the sides of the containment wall. This system is consistent across our operations, no difference between site specific and field wide design. *(See Operator Agreement, Exhibit C, BMP No. 5; Operations Plan and Site Plan.)*
10. **Color/Paint Color:** All permanent above ground associated production equipment, structures and stationary equipment for the Rush South will be painted in a tan or brown matte finish unless a different color is necessary for safety per regulations. *(See Operator Agreement, Exhibit C, BMP No. 8; Operations Plan; and Site Plan Note No. 3.)*
11. **Combustion Devices:** Combustors will be available at the Rush South Well Site during the entire production phase to eliminate fugitive emissions for maintenance or emergency use only. The device will be fired using natural gas and operate with a 98% or higher hydrocarbon destruction efficiency. The device will be designed and operated in a manner that will ensure no visible emissions during normal operation. Visible emissions do not include radiant energy or water vapor. *(See Operator Agreement, Exhibit C, BMP No. 19; Operations Plan; Air Quality Plan and Site Plan (Production page) Best Management Practices Note No. 7.)*
12. **Containment Berms:** A containment system capable of containing one and one-half times (150%) the capacity of the largest vessel, plus sufficient freeboard to prevent overflow will be constructed around all permanent tanks at the Rush South Well Site. The containment system will be constructed of a steel-rim berm and lined with a synthetic or engineered liner, mechanically connected to the steel-rim which will surround all primary containment vessels. When used, temporary vessels will have secondary containment constructed from lined earthen berms or pre-engineered, duck-pond style containment systems. All berms and containment devices will be inspected quarterly. *(See Operator Agreement, Exhibit*

*C, BMP No. 40; Site Plan; Notes #2, Best Management Practices Note No. 2.)*

- 13. Cultural and Historical Resource Protection:** Applicant has not discovered any landmark buildings or sites within the disturbance area for the Rush South. Construction, alteration, removal or demolition of a building or feature or any changes that would impair the cultural or historical association of the landmark building, landmark site or historical district pursuant to those qualities depicted in the City of Aurora Municipal Code will not be made without first obtaining approval. If there is a discovery of historical artifacts at the Rush South Well Site, the City will be notified. *(See Operator Agreement, Exhibit C, BMP No. 47 and Operations Plan.)*
- 14. Discharge Valves:** Open-ended discharge valves on all storage tanks and other containers within the Rush South Well Site will be secured, capped, or blind-flanged, and so they will not be accessible to the general public. The Applicant will ensure that all open-ended discharge valves within the Well Site are placed within the interior of the secondary containment area. *(See Operator Agreement, Exhibit C, BMP No. 11 and Operations Plan.)*
- 15. Electric Equipment:** Applicant is currently working with Xcel Energy to build out electric capacity and infrastructure to power drilling equipment starting June 1, 2020. Applicant will continue to work with Xcel in good faith to secure electric power six months prior to the projected spud date for New Wells at the Rush South Well Site. The operator will continue reasonable efforts to expedite use of electrical line power to operate production equipment *(See Operator Agreement, Exhibit C, BMP No. 13 and Operations Plan.)*
- 16. Events or Incidents:** In the event of a medical, fire or explosion incident on the Rush South Well Site, 911 will be called and local emergency services will be dispatched. Any COGCC reportable safety events or OSHA reportable injuries at the Rush South Well Site will be reported to the City within 24 hours. *(See Operator Agreement, Exhibit C, BMP No. 37 and Emergency Response Plan.)*
- 17. Emergency Response Plan:** A site specific Emergency Response Plan (ERP) has been submitted for this site. The Applicant's emergency response will be uniform and will be executed in the format outlined in the ERP for all emergencies. A revised Emergency Response Plan has been provided to the City. The ERP provides 24 hour contact information for persons responsible for emergency field operations, information on evacuation routes and locations of healthcare facilities anticipated to be used as well as a detailed plan for response to emergencies that may include any or all of the following: explosions, fires, gas, oil or water pipeline leaks or ruptures. The ERP also provides guidance on training and coordination and communication with City emergency personnel and departments. *(See Operator Agreement, Exhibit C, BMP No. 14, and Emergency Response Plan.)*
- 18. Fencing:** Secure, opaque fencing will be installed at the Rush South Well Site after interim reclamation has been completed. This fencing will be eight feet tall. *(See Operator Agreement, Exhibit C, BMP No. 17 and Site Plan.)*
- 19. Flammable Material:** The Rush South Well Site will be maintained in a manner to ensure that all ground within twenty-five (25) feet of any tank or other structure containing flammable or combustible materials will be kept free of dry weeds, grass, rubbish or landscaping. *(See Operations Plan and Operator Agreement, Exhibit C, BMP No. 18.)*
- 20. Flowlines:** All flowlines (the pipeline connecting the wellhead to the production facility) are contained entirely within the boundary of the well pad. No off-location flowlines as defined and set forth in COGCC

Rule 1101, will be utilized. *(See Operations Plan, Operator Agreement, Exhibit C, BMP No. 42 and Site Plan; Notes #11.)*

- 21. Fugitive Dust Suppression:** Dust associated with Well Site activities and traffic on roads will be minimized throughout all phases such that there are no visible dust emissions from sites or roads to the maximum extent practicable given wind conditions. Numerous mitigation measures are in place to minimize dust emissions including (but not limited to): application of fresh water to roads and ground during earth moving activities, curtailment of work during windy conditions and re-establishment of vegetation on disturbed areas that are not graveled. *(See Operations Plan and Operator Agreement, Exhibit C, BMP No. 12, Dust Suppression Plan.)*
- 22. General Maintenance:** All equipment will be operated and maintained pursuant to manufacture specifications consistent with technological limitations and reasonable and customary maintenance practices. In addition to automated shutdowns, preventative maintenance and best practices are in place to prevent leaks from vessels. These include (but are not limited to) yearly shut-downs and visual inspections of each 2-phase and 3-phase vessel on site, yearly non-destructive testing of each 2-phase and 3-phase vessel shell and head on site, internal coating to prevent corrosion, weekly environmental checks by operations personnel, non-destructive testing of all water piping, and non-destructive testing of various flowlines to monitor for thin walled piping caused by erosion or corrosion. *(See Operator Agreement, Exhibit C, BMP No. 35 and Operations Plan.)*
- 23. Landscaping:** Landscaping will be performed on the Rush South once reasonable access to a City water main is within four hundred feet (400') of the Well Site. *(See Operations Plan and Operator Agreement, Exhibit C, BMP No. 20, and Site Plan: Landscape Plan Sheet(s).)*
- 24. Lighting:** Lighting is only used during the Drilling and Completion Phases of operations. No permanent lighting will be installed. All lighting used will be situated so that is downcast and does not shine beyond the boundary of the oil and gas operations area. *(See Operations Plan and Operator Agreement, Exhibit C, BMP No. 21 and Lighting Plan, Site Plan; Photometric Sheet(s).)*
- 25. Low Profile Tanks:** All tanks (associated with the expansion for the development of New Wells) installed on the Rush South Well Site will be no taller than sixteen feet (16'). *(See Operations Plan and Operator Agreement, Exhibit C, BMP No. 9, and Site Plan: Production Equipment Representative Table.)*
- 26. Maintenance of Machinery:** Routine field maintenance of vehicles and mobile machinery will not be performed within 500 feet of navigable waters of the United States. All fueling will occur over impervious material. The Maintenance Supervisor and all supporting personnel will be responsible for compliance with BMP No. 22. *(See Operator Agreement, Exhibit C, BMP No. 22 and Operations Plan.)*
- 27. Mud Tracking:** The Applicant will take all practicable measures to ensure that vehicles do not track mud or debris onto City streets. If mud or debris is deposited on City streets, the Applicant will clean the streets in a reasonable amount of time, or within 24 hours of notice by the City. If the clean-up cannot be done or is postponed, the Applicant will notify the City. Further information may be found in the Operations Plan. This will be accomplished by the Construction Supervisor, Drilling Superintendent, Completions Supervisor and Maintenance Supervisor who understand this requirement and has the responsibility to ensure their teams will meet this requirement. *(See Operator Agreement, Exhibit C, BMP No. 23 and Operations Plan.)*

**28. Noise Management Plan/Noise Mitigation:** The Applicant will comply with the sound limitation regulations set forth in the COGCC 800 Series Aesthetic and Noise Control regulations. The Applicant had Behrens Engineering, a third-party engineering firm, perform an environmental noise impact assessment and will follow its mitigation recommendations to stay in compliance with the COGCC 800 series requirements. Applicant provided Behrens' Noise Modeling Report to the City.

- Per Section 2.2 of the OA, Applicant is required to conduct a baseline noise study if a New Well is planned within 2,640' of 5 Residential Building Units (RBU) or 1 High Occupancy Building (HOB). There are no RBUs or HOBs within 2,640' of the Rush South Well Site, so a baseline noise study is not required.
- Per Section 2.3 of the OA, Applicant is required to use noise mitigation if a New Well is within the area identified on Exhibit A-2 to the OA or if the New Well is within 1,320' of a RBU or 1,500' of a HOB. There are no (0) RBUs within 1,320' of the Rush South Well Site, and there are no (0) HOBs within 1,500' of the Rush South Well Site. However, the Rush South Well Site is located within the area identified on Exhibit A-2 to the OA, so Applicant will use noise mitigation during the Drilling and Completion Phases for the Rush South Well Site. Applicant will use berming, bales, or sound walls to mitigate noise emissions during these phases.
- Per Section 2.4 of the OA, Applicant may be required to conduct additional noise mitigation for New Wells within 1,320' of a RBU. As stated above, there are no RBUs within 1,320' of the Rush South Well Site.
- Per Section 2.6 of the OA, Applicant is required to address C scale noise/vibration if a New Well is within 1,320' of a RBU or 1,500' of a HOB. As stated above, there are no (0) RBUs within 1,320' of the Rush South Well Site, and there are no (0) HOBs within 1,500' of the Rush South Well Site. However, Applicant will already be using noise mitigation during the Drilling and Completion Phases for the Rush South Well Site pursuant to Section 2.3 of the OA.

The Noise Modeling Report indicates that all modeled receptor locations are predicted to comply with the A-weighted and C-weighted COGCC noise limits, as well as the noise limits contained in the Operator Agreement for the drilling and completion operations of the Rush South project without mitigation. (See Operator Agreement, Exhibit C, BMP No. 2 and Noise Mitigation Plan.)

**29. Notifications to the City:** *(Regarding Commencement of Operations and Phases of Operations/ Notifications to the City Regarding Commencement of Construction at CGF and Pipeline Operations/Notifications to the City)* The Applicant will notify the City, through the designated City representative, no less than 30 days prior to the commencement of the Construction for the Rush South (unless the Construction Phase commences within 45 days of the approval of the applicable Form 2, Form 2A, or local permit), Drilling Phase, or Completion Phase, and 30 days prior to recompleting, re-drilling, or plugging and abandonment of the well. Operator will provide all required notifications under the OA to the City by notifying Daniel Brotzman by e-mail at [dbrotzman@auroragov.org](mailto:dbrotzman@auroragov.org) as well as Stephen Rodriguez by e-mail at [srodrigu@auroragov.org](mailto:srodrigu@auroragov.org). (See Operator Agreement, Exhibit C, BMP No. 4.)

**30. Noxious Weed Control:** All disturbed ground not needed for subsequent operations for the Rush South, including stockpiles and cut and fill slopes, are seeded and mulched in accordance with the permits.

Approved weed-free seed mix is used, and these areas are monitored and maintained for weed establishment for the life of the well. *(See Operator Agreement, Exhibit C, BMP No. 33, Weed Control Plan and Operations Plan.)*

- 31. Odor:** Applicant will mitigate odors by routing to closed loop systems to the maximum extent practicable. If the Applicant receives complaints from a Residential Building within 1,320 feet from the Well Site, Applicant will take measures to mitigate the odor within 24 hours, based on the specific circumstances. Further detail may be found in the Air Quality Plan and Operations Plan provided with this application. *(See Operator Agreement, Exhibit C, BMP No. 36, Air Quality Plan and Operations Plan.)*
- 32. PHA-Hazard and Operability Study:** The Applicant has provided a letter that the engineer of record has incorporated all applicable PHA-HAZOP recommendations in the design. On January 29, 2018 a PHA-HAZOP was facilitated by Cyndee R. Clouse, a certified facilitator, and conducted by a multi-disciplined team for the Multi-Well Pad Facility with Individual Separation. While the facility design being evaluated does not fall under Process Safety Management (PSM) pursuant to OSHA 29 CFR 1910.119, the HAZOP process was similar. This study consisted of a risk assessment utilizing methodology commonly used while conducting a Process Hazard Analysis (PHA) with a Layers of Protection Analysis (LOPA). *(See Operator Agreement, Exhibit C, BMP No. 44 and PHA- HAZOP Letter.)*
- 33. Plugged and Decommissioned Well Testing:** Pursuant to COGCC regulation, an offset well evaluation for the Rush South has been submitted to the COGCC for review. This evaluation reveals that no (0) Previously Abandoned wells are located within one thousand five hundred feet (1,500') of the proposed well tract for any New Well proposed to be drilled from the Rush South Location. Therefore, no plugged and decommissioned well testing is required for the Rush South. *(See Operator Agreement, Exhibit C, BMP No. 43 and Operations Plan.)*
- 34. Reclamation:** Because the Rush South is surrounded by grassland, pursuant to COGCC rule 1003 (b.), Interim Reclamation will occur within 6 months of first production. The Applicant will comply with COGCC Rules 1000 series governing the reclamation of sites. An **Interim Reclamation Plan** has been provided within the Site Plan for this application further detailing site-specific reclamation that will take place following the well(s) being put into production. Additional information regarding Interim reclamation may also be found in the Storm Water Management Plan (SWMP), submitted to the Public Works Department and approved by that department. A **Final Reclamation Plan** will be submitted to the City concurrently with the Applicant's plugging and abandonment permit submission to the COGCC. Areas reaching substantial completion of grading and topsoil placement operations will be drill seeded and crimp mulched within 14 days of substantial completion of grading and topsoil operations. If an incomplete area is to remain inactive for longer than 30 days, it will be drill seeded and crimp mulched or otherwise landscaped within 14 days from the suspension or completion of land disturbance activities. *(See Operator Agreement, Exhibit C, BMP No. 39 and Operations Plan.)*
- 35. Reduced Emission Completions (Commonly known as Green Completions):** The Applicant will comply with the EPA Reduced Emission Completions rules (under 40 CFR 60 Subpart OOOO and OOOOa) for oil and gas wells. Applicant will apply best management practices to safely maximize resource recovery and minimize releases to the environment. Applicant was an early adopter of reduced emissions completions (green completions), a charter member of the Natural Gas Star program, and is committed to reducing emissions from flaring and venting. For all projects in the City including the Rush South project, we plan to have a gas pipeline installed and ready to accept natural gas production immediately after initial flowback of wells on this Well Site. Further detail may be found in the Operations Plan and the Air Quality Plan

provided with this application. *(See Operator Agreement, Exhibit C, BMP No. 16, Operations Plan and Air Quality Plan.)*

- 36. Removal of Debris:** The Applicant will ensure that all construction-related debris is removed from the Well Site for proper disposal in a timely manner. The Applicant will ensure that Well Site is reasonably free of debris and excess materials at all times and during all phases of operations. Applicant shall not stockpile debris at the Well Sites. *(See Operator Agreement, Exhibit C, BMP No. 24 and Operations Plan.)*
- 37. Removal of Equipment:** At the end of the flowback stage of development (the beginning of the Production Phase), all temporary equipment will be removed from the Rush South site (within 30 days), leaving only the wellhead(s) and the permanent production facilities, including, separators, storage tanks and emissions control equipment. No permanent storage of removable equipment will occur on this Well Site. *(See Operator Agreement, Exhibit C, BMP No. 25 and Operations Plan.)*
- 38. Road Repairs:** Road repairs will be addressed pursuant to the terms of Road Maintenance Agreement (RMA) executed January 3, 2018 and included with this submission. An amendment to the RMA is currently in process with the City. Pursuant to the RMA, the Applicant has agreed to pay road maintenance fees in lieu of road repair maintenance for the life of the well. The Applicant and the City have agreed that the Applicant will pay an initial fee of \$7,500 per well for road maintenance fees. During the Drilling and Completions Phases of development, the City will be responsible for frequent inspections of the Haul Route. If it is determined by City staff that road repairs are necessary, the City will promptly notify the Applicant, and the Applicant will provide a deposit of 125% of the estimated cost of repairs within 10 business days. *(See Operator Agreement, Exhibit C, BMP No. 29, Operations Plan and Road Maintenance Agreement.)*
- 39. Spills:** The Applicant will notify the City of any spill of materials on permeable ground at the Rush South Well Site that has a reportable quantity under any applicable laws. Applicant will provide a copy of the self-reporting submissions that the Applicant provides to the COGCC due to any spill on the Well Site. Further detail may be found in the Spill Prevention, Control and Countermeasure Plan (SPCC) provided with this application. *(See Operator Agreement, Exhibit C, BMP No. 38 and Operations Plan.)*
- 40. Stormwater Management:** The Applicant will not begin construction of the Rush South Well Site until a Stormwater Water Management Plan (SWMP) is approved by the City and a stormwater quality discharge permit has been acquired for the Well Site. Applicant will perform monthly inspections of stormwater BMPs, or after a storm event. Further detail may be found in the SWMP provided with this application. *(See Operator Agreement, Exhibit C, BMP No. 30, Operations Plan and Stormwater Management Plan.)*
- 41. Trailers:** The Applicant will not place any permanent trailers on the Rush South Well Site. The Applicant will have temporary construction trailers on site during the Construction Phase, Drilling Phase, and Completion Phase of development and up to 6 months following the Completion Phase of development. *(See Operator Agreement, Exhibit C, BMP No. 26, Operations Plan, and Site Plan (Drilling sheet).)*
- 42. Transportation and Circulation:** The Applicant will follow the Traffic Management Plan and Traffic Letter provided with this application. Haul routes have been depicted on the Haul Route Map in the Site Plan for all phases of development. Pursuant to the terms of Road Maintenance Agreement (RMA) executed January 3, 2018, and subsequently amended to include additional routes but not yet fully executed, ConocoPhillips Company and the City have agreed to allow the use of those roads depicted in Exhibit B of the RMA in conjunction with the development of City Well Sites. The Rush South project is depicted on



the original Exhibit to the RMA that was executed on January 3, 2018. (See *Operator Agreement, Exhibit C, BMP No. 27 and Road Maintenance Agreement.*)

- 43. Transportation and Storage of Fluids:** The Applicant will utilize pipelines for the transportation of hydrocarbons for the Rush South. Non-potable water used for hydraulic fracturing will be transported by above-ground water supply line, typically 12" in diameter and typically made of synthetic rubber or similar "hose" material. They are used for the transfer of water from an identified water source to support company's hydraulic fracturing operations. Permanent tanks will be used for storage and transportation of produced water, and for storage of oil under downtime due to third parties. All third-party trucking operations will be subject to the Applicant's HSE policies and procedures. The pre-oil pipeline haul route from the wellsite will follow the private access road to Jewell Ave., then East to Watkins Rd., then North on Watkins Rd. to I-70. The post-oil pipeline from the route will follow the private access road to Jewell Ave., then East to Powhatan Rd., then North on Powhatan Rd. to the I-70 frontage road, then East to I-70. (See *Operator Agreement, Exhibit C, BMP No. 3, Site Plan (Operations Plan page), and the Water Delivery Method.*)
- 44. Tree Mitigation:** There are no trees required to be removed at the Rush South Well Site. (See *Operator Agreement, Exhibit C, BMP No. 10, and Operations Plan.*)
- 45. Visual Mitigation:** Operator Agreement, Exhibit C, BMP No. 49 applies to four specific Well Sites, the Rush South is not one of these Well Sites. (See *Operator Agreement, Exhibit C, BMP No. 49.*)
- 46. Wastewater and Waste Management:** All fluids and waste will be contained and disposed of at licensed disposal or recycling facilities outside of the City. Applicant will provide a Spill Prevention, Control and Countermeasure Plan (SPCC) with the application. (See *Operator Agreement, Exhibit C, BMP No. 31, Waste Management Plan and the SPCC Plan attached as an appendix thereto, and Operations Plan.*)
- 47. Water Protection Requirements:** Identification of sensitive water resources begins in the pre-development planning stage of the project. The proximity of wells to existing City infrastructure is depicted on the Adjacent Visible Improvements sheet of the Site Plan. BMP No. 48 describes that all new wells will be located a minimum of 500' from City Infrastructure unless vibratory studies confirm that no negative impacts occur to the City Infrastructure, in this case the wells may be setback 350' from City Infrastructure. The results of a vibratory study were provided to the City of Aurora Water Department and it was confirmed that a 350' setback was acceptable. (See *Operator Agreement, Exhibit C, BMP No. 48 and Operations Plan.*)
- 48. Water Quality Monitoring Plan/Groundwater Pollution Mitigation:** The Applicant will sample existing water wells prior to drilling activities and will continue to sample existing or installed wells through the Production Phase, until final Reclamation Phase is completed for the well site to ensure that groundwater has not been contaminated by the Applicant's activity. As the well is constructed, concentric layers of steel casing and cement form the barrier to protect groundwater resources from the contents that will later flow inside the well mitigating any potential pollution for groundwater pollution. The depth of the casing will extend to the deepest known depth of the freshwater aquifers. Surface casing is set at +/- 2600 ft TVD and cemented to surface. The production casing is a long string and is cemented to 200 ft inside the surface casing by design. If needed during the Drilling Phase, Applicant shall run temperature or cement log if surface casing cement is not circulated to the surface in order to ensure integrity. Completion well preparation tests production casing to 9800 psi before opening toe sleeve or perforating toe. If pressure test is unsuccessful (i.e. the toe valve leaks) a plug is deployed to test to 9800 psi as deep as the plug will

go on wireline. During the production phase the Applicant will monitor casing pressures using pressure transmitters in the surface. Bradenhead testing will be performed during the completions phase with COGCC staff onsite. (See *Operator Agreement, Exhibit C, BMP No. 46, Fieldwide Water Quality Monitoring Plan, Site Specific Water Quality Monitor location on the Site Plan and Operations Plan.*)

- 49. Water Supply:** Pursuant to the terms of the Agreement for Delivery of Reusable Raw Water effective September 26, 2017 between the City of Aurora and ConocoPhillips Company the Applicant will take delivery from the City of water to be used during the Drilling, Completions, and Production Phases of development. Further details may be found within the Agreement for Delivery of Reusable Raw Water and in the Water Delivery Method. Operator has a site-specific Water Delivery Plan and Method that has been provided to the City with this application. These temporary, above-ground water supply lines ("Lay Flat Lines") are typically 12" in diameter and made of synthetic rubber or similar "hose" material. They are used for the transfer of water from an identified water source to support hydraulic fracturing operations. (See *Operator Agreement, Exhibit C, BMP No. 32, Agreement for Delivery of Reusable Raw Water effective September 26, 2017 between the City of Aurora and ConocoPhillips Company, and Operations Plan.*)

# **NEIGHBORHOOD MEETING RESULTS**

## **Farkas, Scott (Veracity Land Services, LLC)**

---

**Subject:** FW: ConocoPhillips Open House  
**Attachments:** file-7.jpeg; file1-2.jpeg; file2.jpeg; file3.jpeg

---

**From:** Mead, Jayme L <[Jayme.Mead@conocophillips.com](mailto:Jayme.Mead@conocophillips.com)>  
**Sent:** Monday, August 12, 2019 8:55 AM  
**To:** [blegare@auroragov.org](mailto:blegare@auroragov.org)  
**Subject:** ConocoPhillips Open House

Good morning Mayor,

I know you are aware that ConocoPhillips hosted our neighborhood meeting on August 6<sup>th</sup> for ten projects reflected in our Operator's Agreement with the City. We had a diverse team pulled together to engage and educate citizens in Aurora on our operations. We had subject matter experts present from ConocoPhillips representing the following fields: health and safety, noise mitigations, permitting, drilling and completions. We sent out 966 invitations to residents within 1 mile of our locations and had 15 residents in attendance. Although the turnout was low, citizens in attendance were very engaged and provided positive feedback on their experience with our staff and the overall flow of the open house.

Here are the only comments received from the open house:

- *"This open house was very organized! I really appreciate the individual time each ConocoPhillips Person showed to the participants. Super Job!"*
- *"All the different informational tables were staff with top notch professionalism. Will attend a follow-up session hopefully if it's planned. Thanks for the invitation."*

I've attached a few pictures from the event to give you an idea of our setup. Please let me know if you have any questions.

Best regards,

**Jayme Mead** | Stakeholder Relations Advisor Niobrara  
**ConocoPhillips** | 34501 E Quincy Ave. Watkins CO, 80137  
T: 303.268.3757 | M: 505.215.6615 | [Jayme.Mead@conocophillips.com](mailto:Jayme.Mead@conocophillips.com)















# **TYPICAL PHOTOS**



AURORA COLORADO OIL & GAS OPERATIONS  
DRILLING RIG

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



AURORA COLORADO OIL & GAS OPERATIONS  
DRILLING RIG WITH AUTOMATIC PIPE HANDLING

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





AURORA COLORADO OIL & GAS OPERATIONS  
DIESEL FUEL AND GENERATORS WITH SECONDARY CONTAINMENT

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



AURORA COLORADO OIL & GAS OPERATIONS  
MATERIALS STORAGE WITH SECONDARY CONTAINMENT

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





AURORA COLORADO OIL & GAS OPERATIONS  
PIPE STORAGE RACK

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





AURORA COLORADO OIL & GAS OPERATIONS  
OFFICES & TEMPORARY LIVING QUARTERS

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



TRUCKS AND PUMPS



SAND CASTLES AND TRUCKS



AURORA COLORADO OIL & GAS OPERATIONS  
COMPLETION SITE

CONOCOPHILLIPS COMPANY  
ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





AURORA COLORADO OIL & GAS OPERATIONS  
TEMPORARY SOUND MITIGATION WALLS

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



AURORA COLORADO OIL & GAS OPERATIONS  
MOBILE TORNADO SHELTER

CONOCOPHILLIPS COMPANY  
ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





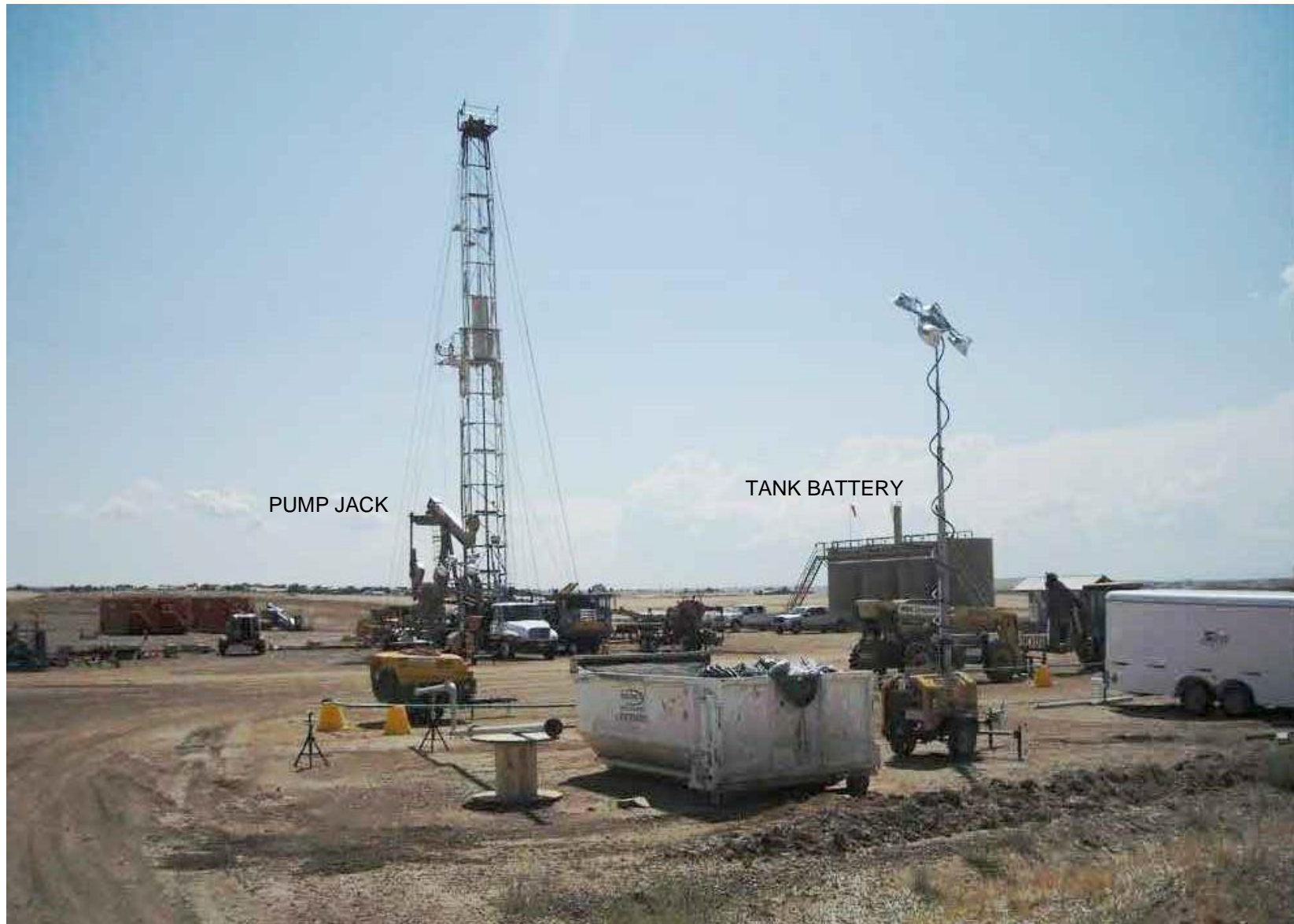
AURORA COLORADO OIL & GAS OPERATIONS  
PRODUCTION FACILITY

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



PUMP JACK

TANK BATTERY

AURORA COLORADO OIL & GAS OPERATIONS  
WORKOVER RIG-PRODUCTION SETTING

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546



AURORA COLORADO OIL & GAS OPERATIONS  
CLOSED LOOP DRILLING SYSTEM (MUD TANKS)

CONOCOPHILLIPS COMPANY

ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546





AURORA COLORADO OIL & GAS OPERATIONS  
SIGNAGE

CONOCOPHILLIPS COMPANY  
ATTN: KATHY DENZER  
34501 E. QUINCY AVE., BUILDING 1  
WATKINS, CO 80137  
PHONE: (303) 268-3773



10333 E. Dry Creek Rd.  
Suite 240  
Englewood, CO 80112  
Tel: (720) 482-9526  
Fax: (720) 482-9546

# **PLAT PACKAGE**

**(EXCERPTS)**

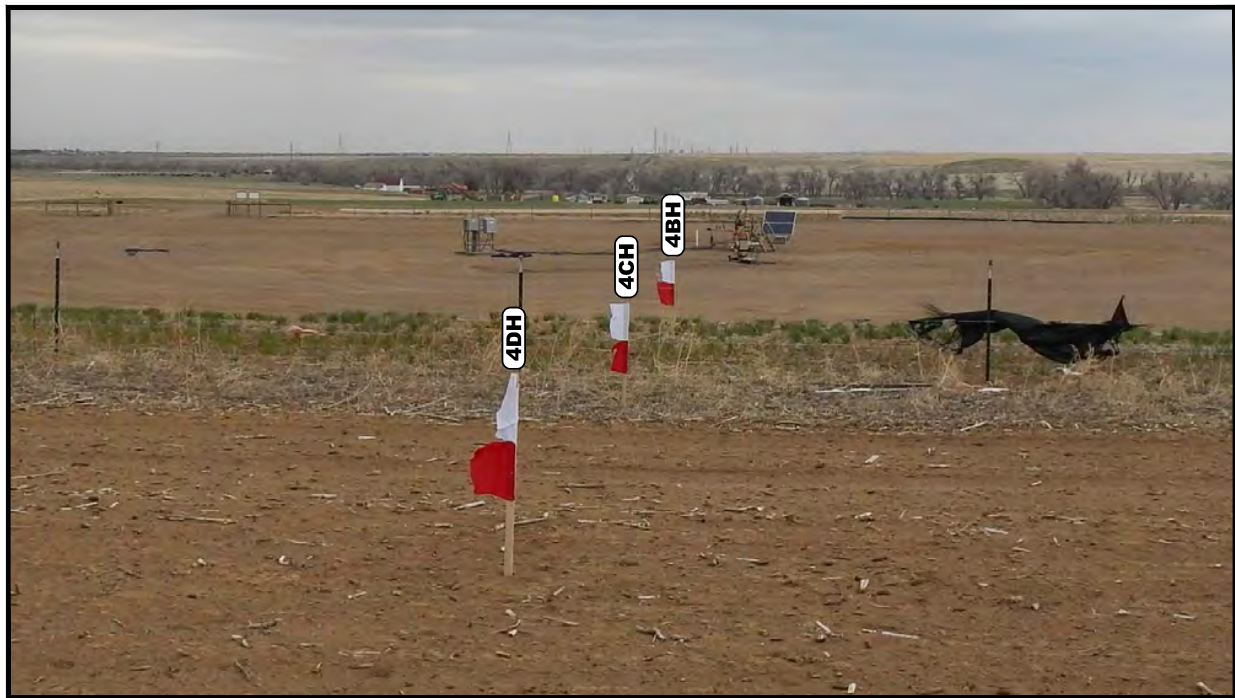


PHOTO: VIEW OF LOCATION STAKES

CAMERA ANGLE: NORTHERLY



PHOTO: VIEW OF LOCATION STAKES

CAMERA ANGLE: EASTERLY

REV: 1 04-30-18 J.L.G. (PAD EXPANSION)

**LEGEND:**



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



**ConocoPhillips Company**

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

TAKEN BY	C.M., O.R.	04-20-18	
DRAWN BY	J.L.G.	02-09-17	
<b>LOCATION PHOTOS</b>		<b>PHOTO 1</b>	



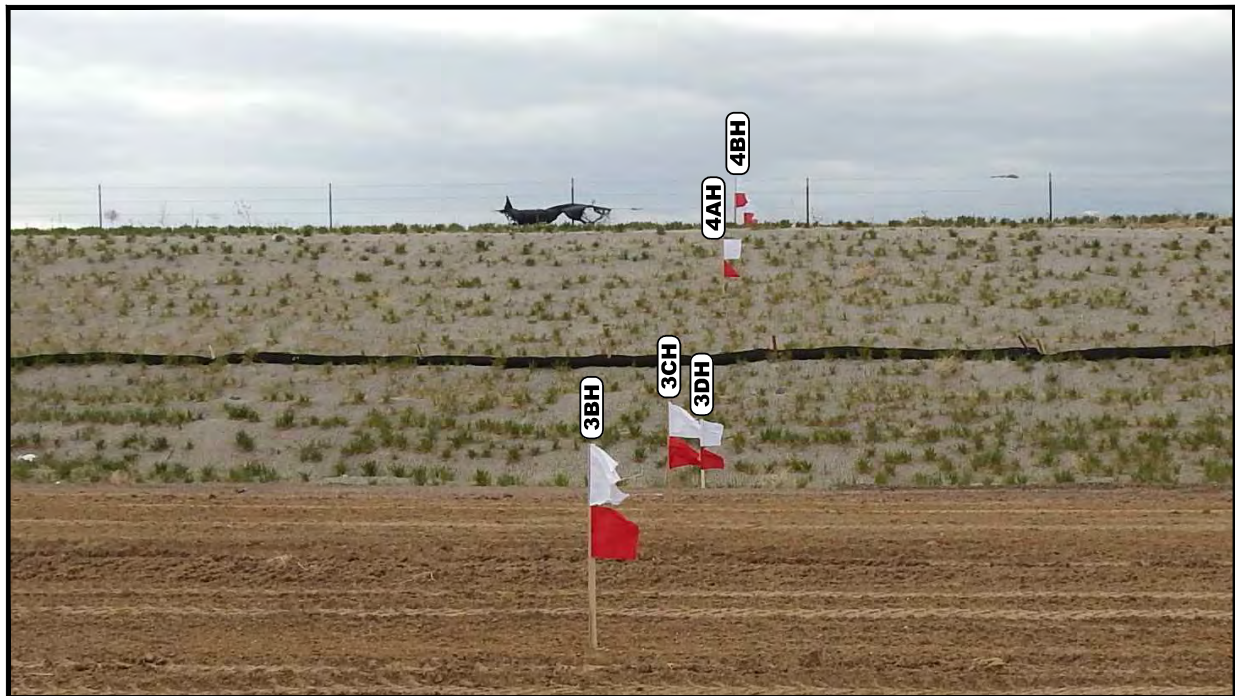


PHOTO: VIEW OF LOCATION STAKES

CAMERA ANGLE: SOUTHERLY



PHOTO: VIEW OF LOCATION STAKES

CAMERA ANGLE: WESTERLY

REV: 1 04-30-18 J.L.G. (PAD EXPANSION)

**LEGEND:**



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



**ConocoPhillips Company**

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

TAKEN BY	C.M., O.R.	04-20-18	
DRAWN BY	J.L.G.	02-09-17	
<b>LOCATION PHOTOS</b>		<b>PHOTO 2</b>	

LEGEND:

- 90° SYMBOL
- PROPOSED WELLHEAD.
- TARGET BOTTOM HOLE.
- SECTION CORNERS LOCATED. (NAD 83)
- PRODUCTION INTERVAL.

LINE	DIRECTION	LENGTH
L1	N47°48'45"W	1176.26'
L2	N89°54'42"W	135.00'
L3	N60°22'10"W	1007.17'
L4	N89°54'42"W	135.00'
L5	N76°49'02"W	903.18'
L6	N89°54'42"W	135.00'
L7	S84°34'03"W	887.25'
L8	N89°54'42"W	135.00'
L9	S67°02'00"W	963.56'
L10	N89°54'42"W	135.00'
L11	S58°13'35"W	1046.33'
L12	N89°54'42"W	135.00'
L13	S50°51'21"W	1149.97'
L14	N89°54'42"W	135.00'

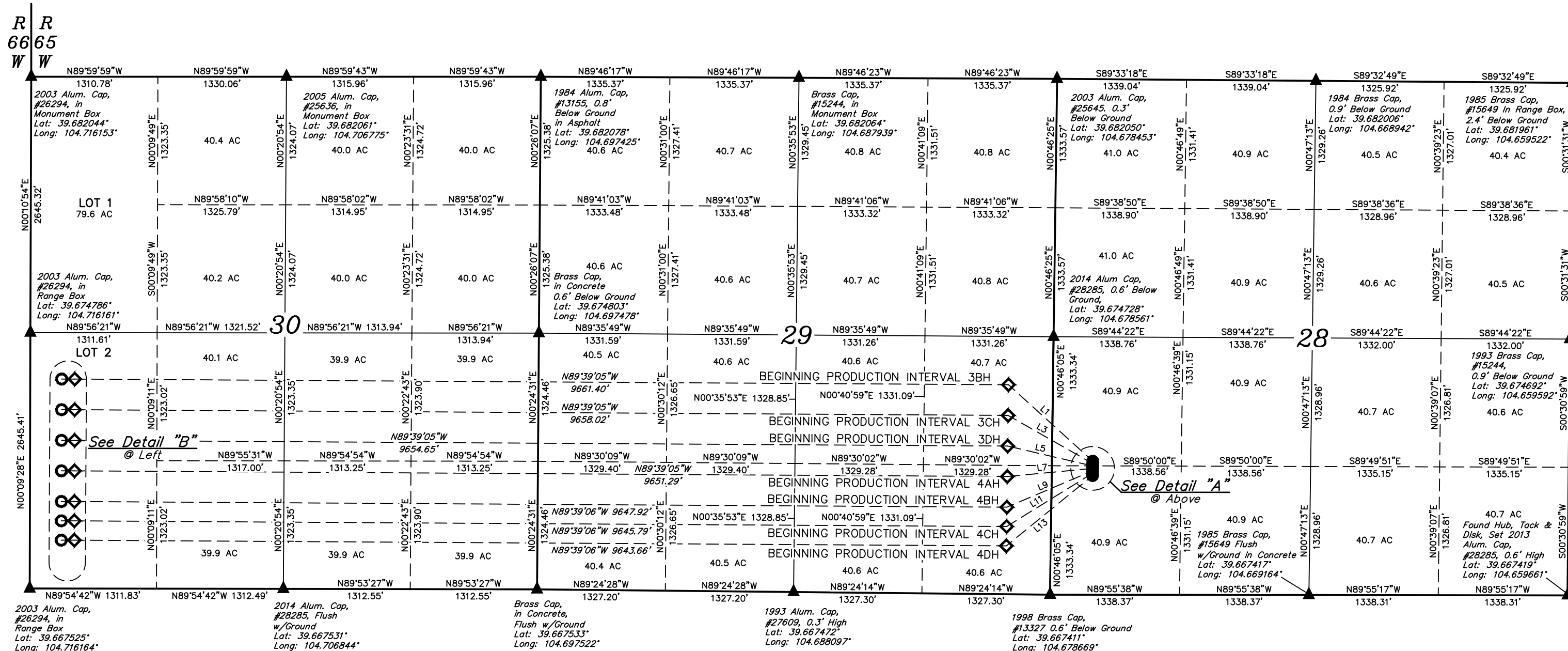
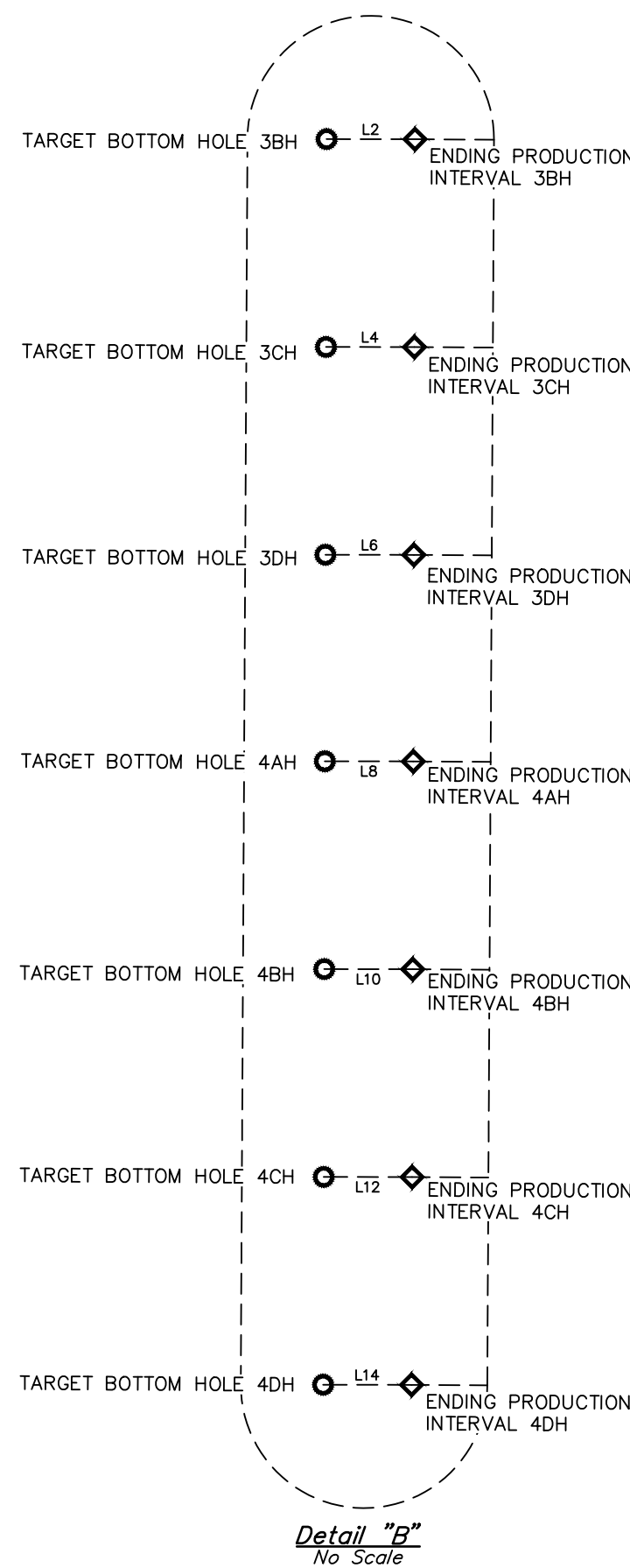
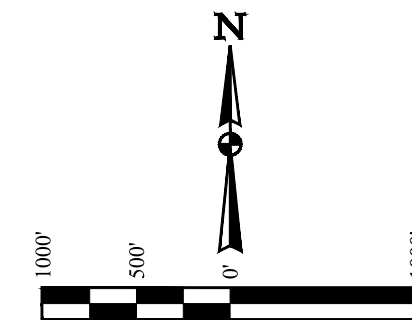
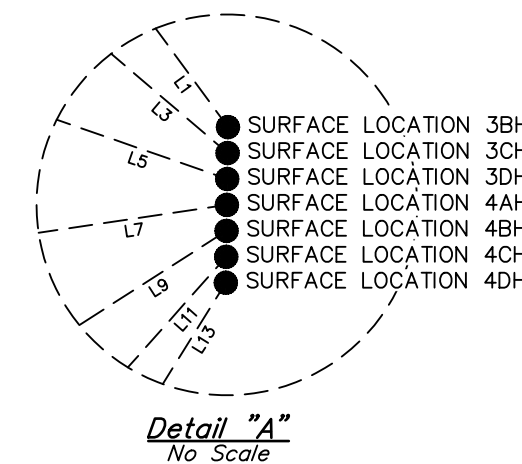
T4S, R65W, 6th P.M.

ConocoPhillips Company

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

BASIS OF BEARINGS  
BASIS OF BEARINGS IS A G.P.S. OBSERVATION  
BASIS OF ELEVATION

BENCHMARK 374 LOCATED ON THE SECTION LINE BETWEEN  
SECTIONS 12 & 13, T5S, R64W, 6th P.M., TAKEN FROM 1988  
PUBLISHED DATUM BY THE UNITED STATES DEPARTMENT OF  
THE INTERIOR, GEOLOGICAL SURVEY AS BEING 6054.61 FEET.



WELL	SURFACE LOCATION	BEGINNING PRODUCTION INTERVAL	ENDING PRODUCTION INTERVAL	TARGET BOTTOM HOLE
3BH	1381' FSL 422' FWL	2166' FSL 460' FEL	2166' FSL 460' FWL	2166' FSL 325' FWL
3CH	1356' FSL 422' FWL	1849' FSL 460' FEL	1849' FSL 460' FWL	1849' FSL 325' FWL
3DH	1331' FSL 422' FWL	1532' FSL 460' FEL	1532' FSL 460' FWL	1532' FSL 325' FWL
4AH	1306' FSL 422' FWL	1217' FSL 460' FEL	1217' FSL 460' FWL	1217' FSL 325' FWL
4BH	1281' FSL 422' FWL	900' FSL 460' FEL	900' FSL 460' FWL	900' FSL 325' FWL
4CH	1256' FSL 422' FWL	700' FSL 460' FEL	700' FSL 460' FWL	700' FSL 325' FWL
4DH	1231' FSL 422' FWL	500' FSL 460' FEL	500' FSL 460' FWL	500' FSL 325' FWL

CERTIFICATE OF REGISTRATION  
THIS IS TO CERTIFY THAT THE ABOVE MAP WAS PREPARED IN ACCORDANCE WITH THE NOTES OF ACTUAL SURVEYS MADE BY ME OR UNDER MY SUPERVISION AND THAT THE SAME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

REGISTERED LAND SURVEYOR  
REGISTRATION NO. 28285  
STATE OF COLORADO

REV: 2	05-04-18	C.C. (SHL, BPI, EPI & TBH MOVE)
SURVEYED BY	CHAD MEIERS, O.R.	04-20-18
DRAWN BY	K.B.	05-19-18
SECTION BREAKDOWN		



UEL, LLC  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



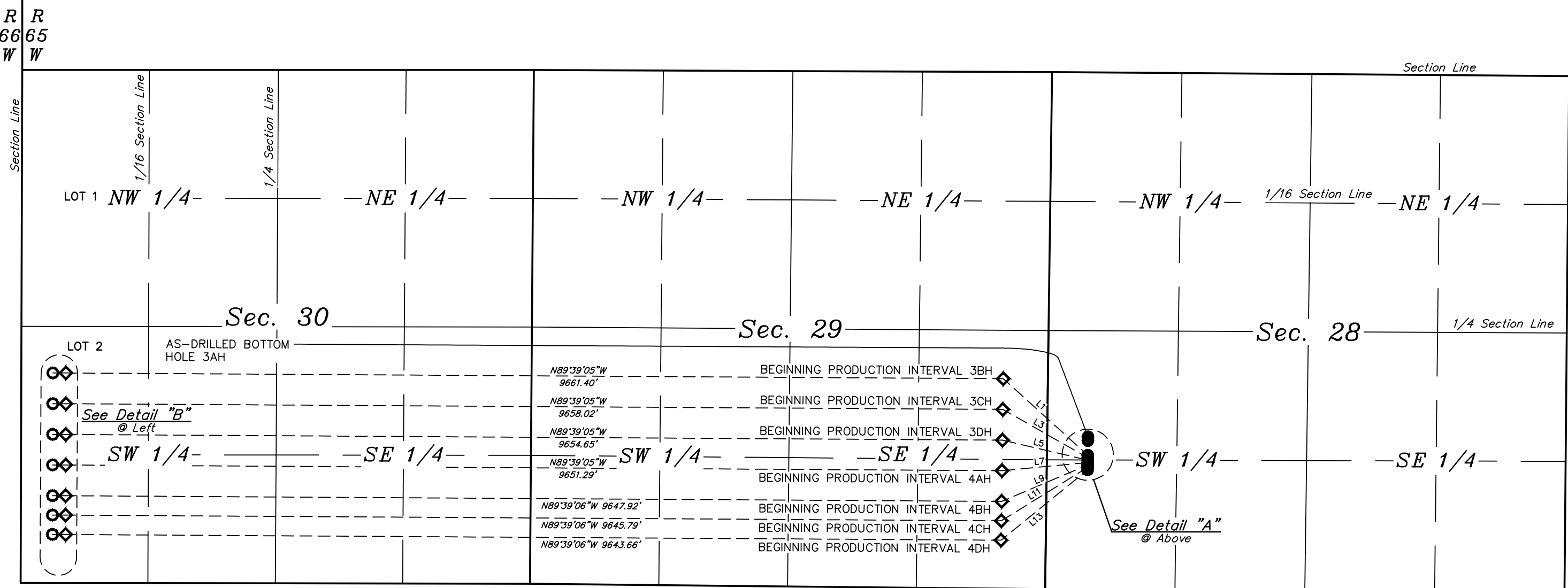
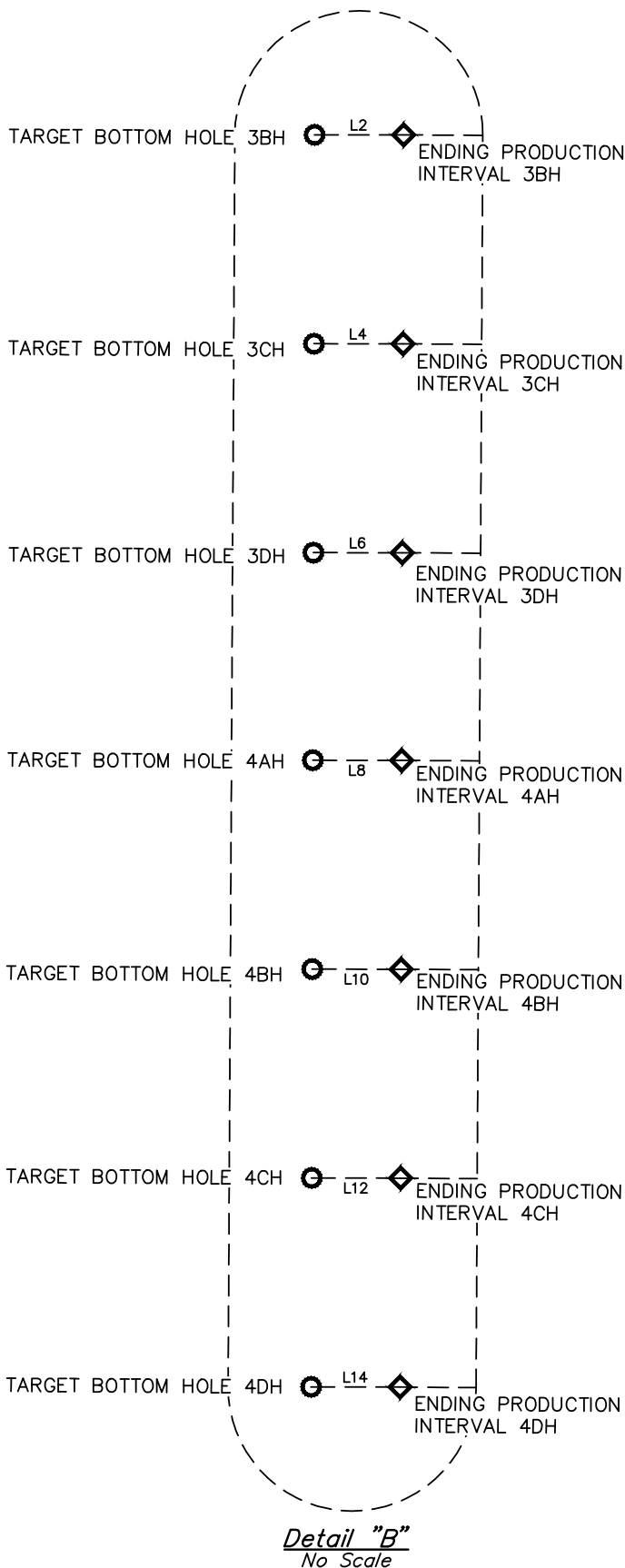
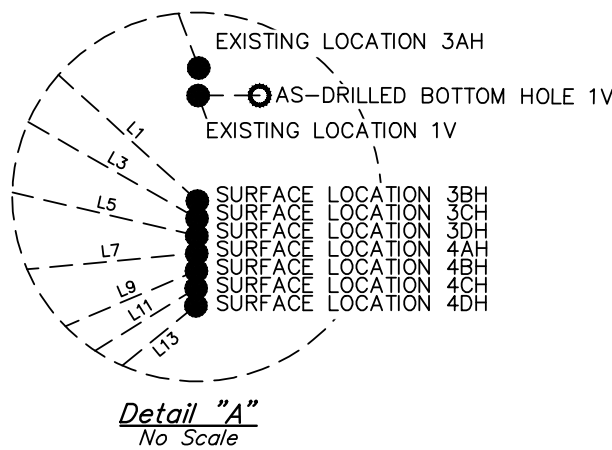


LEGEND:

- = WELLHEAD LOCATION.
- = TARGET BOTTOM HOLE.
- ◇ = PRODUCTION INTERVAL.

LINE TABLE		
LINE	DIRECTION	LENGTH
L1	N47°48'45"W	1176.26'
L2	N89°54'42"W	135.00'
L3	N60°22'10"W	1007.17'
L4	N89°54'42"W	135.00'
L5	N76°49'02"W	903.18'
L6	N89°54'42"W	135.00'
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L11	S58°13'35"W	1046.33'
L12	N89°54'42"W	135.00'
L13	S50°51'21"W	1149.97'
L14	N89°54'42"W	135.00'

T4S, R65W, 6th P.M.



REV: 3 06-14-18 D.J.W. (REMOVE PAD)

NOTES:



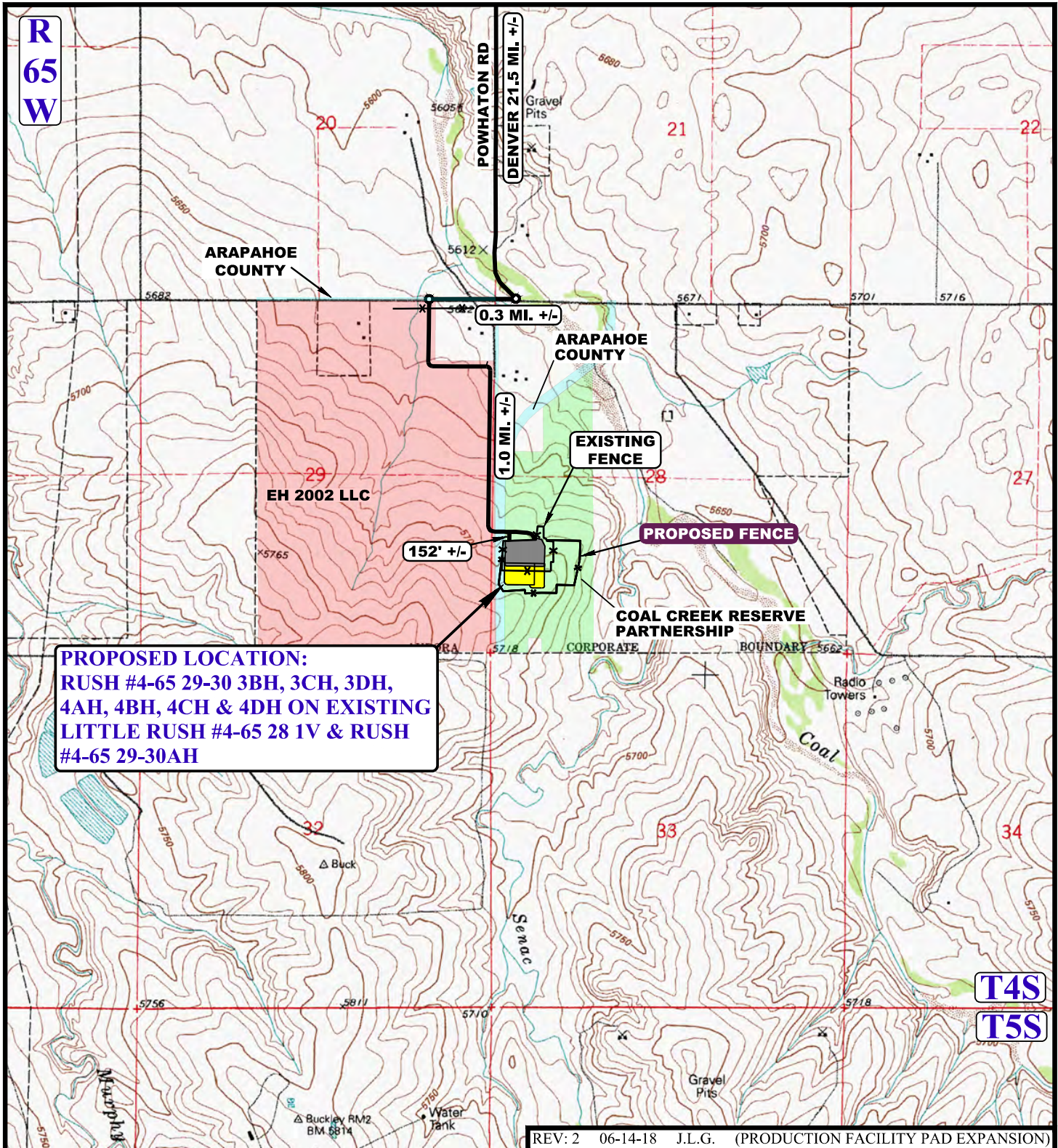
UELS, LLC  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017

ConocoPhillips Company

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

SURVEYED BY	CHAD MEIERS, O.R.	04-20-18	SCALE
DRAWN BY	K.B.	05-19-15	1" = 1000'
MULTI-WELL PLAN		FIGURE #4	





REV: 2 06-14-18 J.L.G. (PRODUCTION FACILITY PAD EXPANSION)

NOTE: PARCEL DATA SHOWN HAS BEEN OBTAINED FROM VARIOUS SOURCES AND SHOULD BE USED FOR MAPPING, GRAPHIC AND PLANNING PURPOSES ONLY. NO WARRANTY IS MADE BY UINAH ENGINEERING AND LAND SURVEYING (UELS) FOR ACCURACY OF THE PARCEL DATA.

#### LEGEND:

- EXISTING ROAD
- \* — EXISTING FENCE
- \* — PROPOSED FENCE



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017

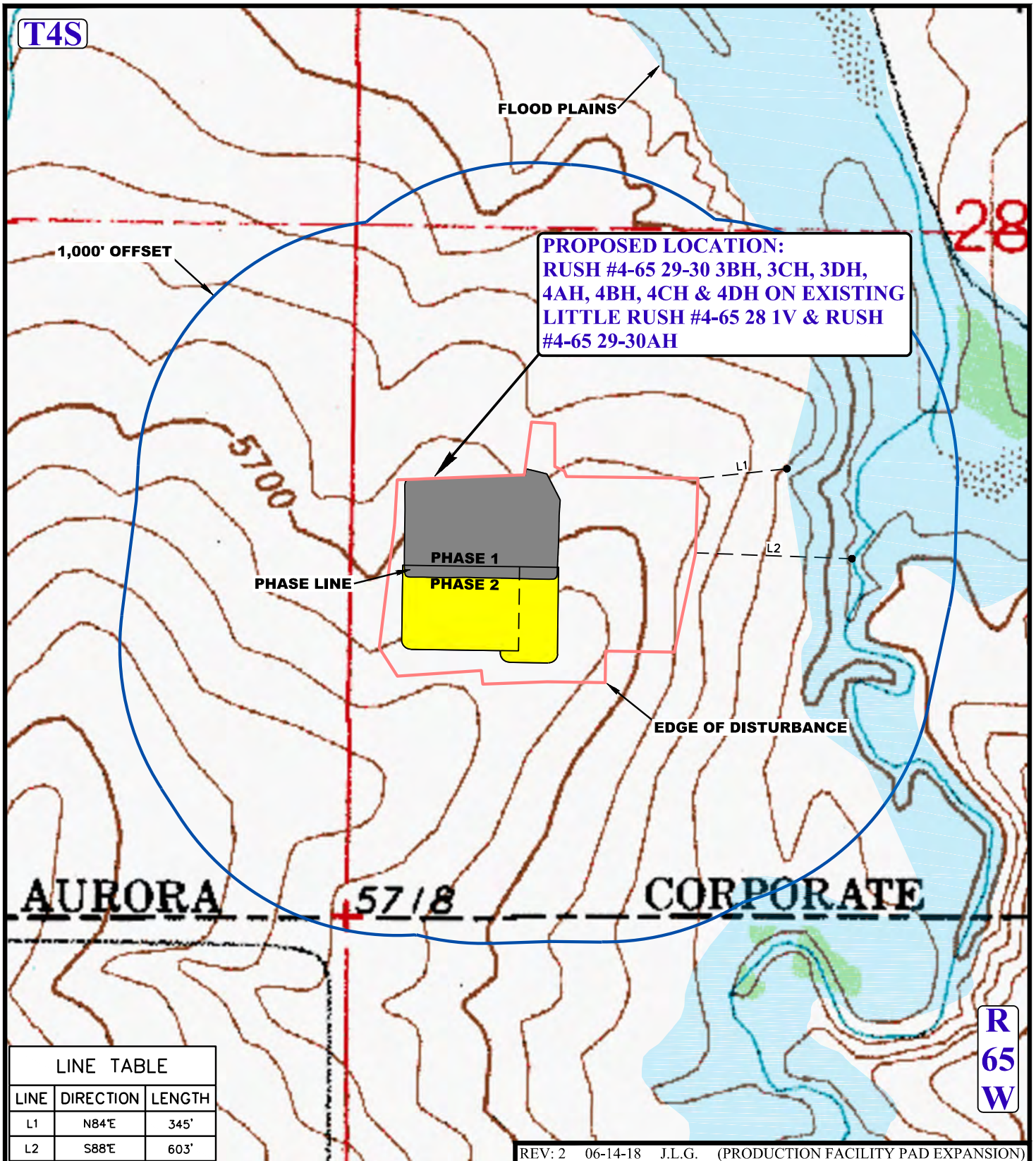


#### ConocoPhillips Company

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

SURVEYED BY	C.M., O.R.	04-20-18	SCALE
DRAWN BY	J.L.G.	02-09-17	1 : 24,000
<b>ACCESS ROAD MAP</b>			<b>TOPO B</b>





#### LEGEND:

- EXISTING DRAINAGE
- 1000' OFFSET BOUNDARY
- EDGE OF DISTURBANCE



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



#### ConocoPhillips Company

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

SURVEYED BY	C.M., O.R.	04-20-18	SCALE
DRAWN BY	J.L.G.	02-09-17	1 : 6000
HYDROLOGY MAP			TOPO W





PHOTO: VIEW OF REFERENCE AREA

CAMERA ANGLE: NORTHERLY



PHOTO: VIEW OF REFERENCE AREA

CAMERA ANGLE: EASTERLY

REV: 1 04-30-18 J.L.G. (PAD EXPANSION)

**LEGEND:**



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



**ConocoPhillips Company**

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

TAKEN BY	C.M., O.R.	04-20-18	
DRAWN BY	J.L.G.	02-09-17	
REFERENCE AREA PHOTOS			REF 1





PHOTO: VIEW OF REFERENCE AREA

CAMERA ANGLE: SOUTHERLY



PHOTO: VIEW OF REFERENCE AREA

CAMERA ANGLE: WESTERLY

REV: 1 04-30-18 J.L.G. (PAD EXPANSION)

**LEGEND:**



**UELS, LLC**  
Corporate Office \* 85 South 200 East  
Vernal, UT 84078 \* (435) 789-1017



**ConocoPhillips Company**

RUSH #4-65 29-30 3BH, 3CH, 3DH, 4AH, 4BH, 4CH & 4DH  
ON EXISTING LITTLE RUSH #4-65 28 1V & RUSH #4-65 29-30 3AH  
W 1/2 SW 1/4, SECTION 28, T4S, R65W, 6th P.M.  
ARAPAHOE COUNTY, COLORADO

TAKEN BY	C.M., O.R.	04-20-18	
DRAWN BY	J.L.G.	02-09-17	
REFERENCE AREA PHOTOS			REF 2