**FORM 2A** 

Rev 08/19

## State of Colorado





Document Number:

402147964

Oil and Gas Conservation Commission	
1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109	

Oil	and Gas Lo	cation Asse	ssment			Date Received:
New Location	Refile [	Amend Existin	ng Location	Location#:	449806	09/21/2019
This Oil and Gas Location Ass activity associated with oil and construction of the below spec land use authority. Please set pertinent this Oil and Gas Loca	I gas operations. Ap cified Location; howe e the COGCC webs	oproval of this Oil a ever, it does not su	nd Gas Location persede any la	on Assessment will and use rules applie	allow for the ed by the local	Location ID:  449806  Expiration Date:  01/22/2023
X This location assessment	is included as pa	ırt of a permit apı	olication.			
CONSULTATION						
This location is includ	ed in a Comprehe	ensive Drilling Pla	an. CDP#		_	
This location is in a se	ensitive wildlife ha	bitat area.				
This location is in a w	ildlife restricted su	ırface occupancy	area.			
This location includes	a Rule 306.d.(1)	A.ii. variance req	uest.			
Operator				Contact	Information	
Operator Number: 26	6580			Name:	LARRY SMITH	
Name: BURLINGTON R	ESOURCES OIL	& GAS LP		Phone:	(832) 4862590	
Address: 925 N ELDRID	GE PARKWAY			Fax:	(918) 6628057	
City: HOUSTON	State:	TX Zip:	77079	email:	LARRY.R.SMITH	H@CONOCOPHI
FINANCIAL ASSURANC  Plugging and Abandor  Waste Management S	nment Bond Suret urety ID (Rule 704		19920030	☐ Gas Fac	cility Surety ID (Ru	ule 711):
LOCATION IDENTIFICA	TION					
Name: RUSH 4-65 29-30				Number: 3AH		
County: ARAPAHOE						
QuarterQuarter: NWSW	Section: 28	Township:	4S Ran	ge: <u>65W</u> M	leridian: 6	Ground Elevation: 5695
Define a single point as a lo a well location.	cation reference t	or the facility loc	ation. When	the location is to	be used as a well	site then the point shall be
Footage at surface: _1381	feet FSL from	m North or South	section line			
422	feet FWL from	m East or West s	section line			
Latitude: 39.671200	Longitude: -10	4.677120				
PDOP Reading: 1.5	Date of	Measurement:	04/20/2018			
Instrument Operator's Name	e: CHAD MEIEF	RS				
LOCAL GOVERNMENT IN	FORMATION					
County: ARAPAHOE		Munici	pality: Auror	а		

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."				
The local government with jurisdiction is: Municipality				
Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition below.				
If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location.				
The local government siting permit type is: OIL AND GAS PERMIT				
The local government siting permit was filed on: 10/10/2018				
The disposition of the application filed with the local government is: Approved				
Additional explanation of local process:				
Approved November 1, 2019. Case Number: 2017-6005-04				
RELATED REMOTE LOCATIONS				
(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)				
This proposed Oil and Gas Location is:  LOCATION ID # FORM 2A DOC #				
FACILITIES				
Indicate the number of each type of oil and gas facility planned on location				
Wells 9 Oil Tanks* 8 Condensate Tanks* Water Tanks* 3 Buried Produced Water Vaults*				
Drilling Pits Production Pits* Special Purpose Pits Multi-Well Pits* Modular Large Volume Tanks				
Pump Jacks 1 Separators* 5 Injection Pumps* 1 Cavity Pumps* Gas Compressors* 1				
Gas or Diesel Motors* Electric Motors 24 Electric Generators* 1 Fuel Tanks* 1 LACT Unit* 1				
Dehydrator Units* Vapor Recovery Unit* 7 VOC Combustor* 2 Flare* 1 Pigging Station*				
OTHER FACILITIES*				
Other Facility Type Number				
Vapor Recovery Tower 1				
*Those facilities indicated by an asterisk (*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.				
Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:				
All ConocoPhillips pipelines are installed and operated by Bronco Pipeline Company, a Colorado corporation, and wholly owned subsidiary of ConocoPhillips. All pipelines are operated in full compliance with all federal, state, and local municipality regulations.				
From the wellheads, 3" carbon steel flowlines run to an inlet manifold which routes flow to either bulk or test 2 phase separators. High pressure gas from the bulk and test 2 phase separators is sent down the sales gas line to a third party. The liquid from the bulk and test 2 phase separators is carried to bulk and test 3 phase separators for further processing. Low pressure gas off the 3 phase bulk and test separators is sent to a vapor recovery unit to compress the low pressure gas so it can be sent down the high pressure sales line to a third party. Oil from the bulk and test 3 phase separators is transferred to a vapor recovery tower then to tankage for storage.				

CONSTRUCTION
Date planned to commence construction: 08/25/2020 Size of disturbed area during construction in acres: 20.29  Estimated date that interim reclamation will begin: 05/04/2021 Size of location after interim reclamation in acres: 14.67
Estimated post-construction ground elevation: 5696
DRILLING PROGRAM
Will a closed loop system be used for drilling fluids: Yes
Is H <sub>2</sub> S anticipated? No
Will salt sections be encountered during drilling: No
Will salt based mud (>15,000 ppm Cl) be used? No
Will oil based drilling fluids be used? Yes
DRILLING WASTE MANAGEMENT PROGRAM
Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Recycle/reuse
Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal
Other Disposal Description:
Commercial Disposal facility for freshwater used to drill surface section. Oil Based Mud used for remainder of lateral drilled will be reused from pad to pad.
Beneficial reuse or land application plan submitted? No
Reuse Facility ID: or Document Number:
Centralized E&P Waste Management Facility ID, if applicable:
SURFACE & MINERALS & RIGHT TO CONSTRUCT
Name: Alpert Corporation Phone: 303-773-3400
Address: 3033 East 1st Avenue, Suite 725 Fax: 303-694-6445
Address: Email:
Address: Email:
Address: Email:  City: Denver State: CO Zip: 80206  Surface Owner: X Fee State Federal Indian
Address: Email:
Address: Email:  City: Denver State: CO Zip: 80206  Surface Owner:
Address: Email:
Address: Email:  City: Denver State: CO Zip: 80206  Surface Owner:
Address: Email:  City: Denver State: CO Zip: 80206  Surface Owner:  Fee State Federal Indian  Check all that apply. The Surface Owner:  is the mineral owner    X   State   Federal   Indian
Address:  City: Denver State: CO Zip: 80206  Surface Owner: IX Fee State Federal Indian  Check all that apply. The Surface Owner: IX is the mineral owner  IX is committed to an oil and Gas Lease  IX has signed the Oil and Gas Lease  IX is the applicant  The Mineral Owner beneath this Oil and Gas Location is: IX Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No
Address:  City: Denver State: CO Zip: 80206  Surface Owner: X Fee State Federal Indian  Check all that apply. The Surface Owner: X is the mineral owner  X is committed to an oil and Gas Lease  X has signed the Oil and Gas Lease  is the applicant  The Mineral Owner beneath this Oil and Gas Location is: X Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No  The right to construct this Oil and Gas Location is granted by: Surface Use Agreement
Address:  City: Denver State: CO Zip: 80206  Surface Owner: IX Fee State Federal Indian  Check all that apply. The Surface Owner: IX is the mineral owner  IX is committed to an oil and Gas Lease  IX has signed the Oil and Gas Lease  IX is the applicant  The Mineral Owner beneath this Oil and Gas Location is: IX Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No
Address: State: _CO _ Zip: _80206 Surface Owner: _\oversign Fee _ State _ Federal _ Indian Check all that apply. The Surface Owner: _\oversign is the mineral owner is committed to an oil and Gas Lease is the applicant  The Mineral Owner beneath this Oil and Gas Location is: _\oversign Fee _ State _ Federal _ Indian The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: _No The right to construct this Oil and Gas Location is granted by: _Surface Use Agreement Surface damage assurance if no agreement is in place: Surface Surety ID:
Address: State: _CO _ Zip: _80206 Surface Owner: _\oversign Fee State Federal Indian Check all that apply. The Surface Owner: _\oversign is the mineral owner
Address:  City: Denver State: CO Zip: 80206  Surface Owner:  Fee State Federal Indian  Check all that apply. The Surface Owner:  is is the mineral owner      is committed to an oil and Gas Lease      has signed the Oil and Gas Lease      is the applicant  The Mineral Owner beneath this Oil and Gas Location is:  Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No  The right to construct this Oil and Gas Location is granted by: Surface Use Agreement  Surface damage assurance if no agreement is in place: Surface Surety ID:  Date of Rule 306 surface owner consultation  If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s):  CURRENT AND FUTURE LAND USE
Address:  City: Denver State: CO Zip: 80206  Surface Owner:  Fee State Federal Indian  Check all that apply. The Surface Owner:  is the mineral owner      is committed to an oil and Gas Lease     is the applicant  The Mineral Owner beneath this Oil and Gas Location is:  Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No  The right to construct this Oil and Gas Location is granted by: Surface Use Agreement  Surface damage assurance if no agreement is in place:  Date of Rule 306 surface owner consultation  If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s):

Subdivided: Industrial	Commercia	l Residential			
Future Land Use (Check all that apply):					
Crop Land: Irrigated	⊠ Dry land	■ Improved Pasture ■ Hay	y Meadow 🔲 CRP		
Non-Crop Land: Rangeland	Timber	Recreational Oth	er (describe):		
Subdivided: Industrial	Commercia	Residential			
CULTURAL DISTANCE INFORMATION	ON		INSTRUCTIONS:		
Provide the distance to the nearest cu Production Facilities onsite.	Itural feature as mea	sured from Wells or	- All measurements shall be provided from		
		From PRODUCTION	center of nearest Well or edge of nearest Production Facility to nearest of each		
	From WELL	FACILITY	cultural feature as described in Rule 303.b. (3)A.		
Building:	2454 Feet	2667_ Feet	- Enter 5280 for distance greater than 1		
Building Unit:	2626 Feet	2863 Feet	mile Building - nearest building of any type. If		
High Occupancy Building Unit:	3832 Feet	3833 Feet	nearest Building is a Building Unit, enter		
Designated Outside Activity Area:	5280 Feet	5280 Feet	same distance for both Building Unit, High Occupancy Building		
Public Road:	3597 Feet	3361 Feet	Unit, Designated Outside Activity Area,		
Above Ground Utility:	Feet	2593 Feet	School Facility, and Child Care Center – as defined in 100 Series Rules.		
Railroad:	5280 Feet	5280 Feet	-For measurement purposes only,		
Property Line:	278_ Feet	522 Feet	Production Facilities should only include those items with an asterisk(*) on the		
School Facility::	3830 Feet	3317 Feet	Facilities Tab.		
School Property Line:	1222 Feet	782 Feet			
Child Care Center:	5280 Feet	5280 Feet			
SCHOOL SETBACK INFORMATION					
Was Notice required under Rule 305	5.a.(4)? X Yes	No			
			INSTRUCTIONS:		
Date pre-application Notice of Intent accordance with Rule 305.a.(4):	to Conduct Oil & Ga	s Operations was sent in 08/22/20	<ul> <li>If more than one Notice of intent was sent, enter date of LAST sent. If Notice was waived,</li> </ul>		
Following receipt of Notice of Intent,	did anv School Gove	erning Body request Yes X No	enter date waived and attach waiver See Rule 303.b.(3)U.		
consultation?		and a series of the series of	550 Nate 555 S.(5),51		
Did the operator reach agreement w			- See Rule 303.b.(3)U.		
Bodies) regarding identification of So	chool Facilities or Ch	ild Care Centers?			
Is hearing before the Commission re of this Form 2A?	quested or necessar	ry for the approval Yes X No	- See Rule 604.a.(3), 604.a.(6)A.ii., or 604.a.(6)C.		
If "YES", provide Docket Number:			- If Docket Number has not been assigned, enter "pending"; If hearing application has not been		
			submitted, Form may be rejected.		

DESIGNATED SETBACK LOCATION INFORMATION	
Check all that apply. This location is within a:	- Buffer Zone - as described in Rule 604.a. (2), within 1,000' of a Building Unit.
■ Buffer Zone	- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
Exception Zone	- Urban Mitigation Area - as defined in 100-
Urban Mitigation Area	Series Rules Large UMA Facility – as defined in 100- Series Rules.
Pre-application Notifications (required if location is within 1,000 feet of a building unit):	Series Rules.
Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government:	_
Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners:	
FOR MULTI-WELL PADS AND PRODUCTION FACILTIES WITHIN DESIGNATED SETBACK L	OCATIONS ONLY:
Check this box if this Oil and Gas Location has or will have Production Facilities that serve mul Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. (Pur must evaluate alternative locations for the Production Facilities that are farther from the Building alternative locations were technically feasible and economically practicable for the same proposition.	suant to Rule 604.c.(2)E.i., the operator og Unit, and determine whether those
By checking this box, I certify that no alternative placements for the Production Facilities, farther available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.	er from the nearest Building Unit, were
In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports attach documentation that supports your determination to this Form 2A.	your Rule 604.c.(2)E.i determination.
List all soil map units that occur within the proposed location. attach the National Resoureport showing the "Map Unit Description" report listing the soil typical vertical profile. T segregating topsoil.  The required information can be obtained from the NRCS web site at http://soildatamar COGCC web site GIS Online map page found at http://colorado.gov/cogcc. Instructions web site help section.	his data is to used when the
NRCS Map Unit Name: RhD- Renohill-Buick loams, 3 to 9 percent slopes	
NRCS Map Unit Name:	
NRCS Map Unit Name:	
PLANT COMMUNITY:	
Complete this section only if any portion of the disturbed area of the location's current la	and use is on non-crop land.
Are noxious weeds present: Yes ■ No 区	
Plant species from: NRCS or, field observation Date	e of observation:
List individual species:	

Check all plant communities that exist in the disturbed area.				
Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)				
Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)				
Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)				
Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)				
Mountain Riparian (Cottonwood, Willow, Blue Spruce)				
Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)				
Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)				
Alpine (above timberline)				
Other (describe):	_			
WATER RESOURCES				
Is this a sensitive area: ☐ No ☒ Yes				
Distance to nearest				
downgradient surface water feature: 878 Feet				
water well: 2205 Feet				
Estimated depth to ground water at Oil and Gas Location25 Feet				
Basis for depth to groundwater and sensitive area determination:				
Approximately 25 ft according to Permit # 251833, Permit #121687, and Permit #48010 (COGCC accessed 4/10/18)				
Is the location in a riparian area: 区 No ☐ Yes				
Was an Army Corps of Engineers Section 404 permit filed 🗵 No 📃 Yes If yes attach permit.				
Is the location within a Rule 317B Surface Water Supply Area buffer No				
zone:				
If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified:				
Is the Location within a Sources Reviewed (check all that apply) Floodplain?				
⊠ Federal (FEMA)				
☐ State				
County				
Local				
☐ Other				
GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING				
Water well sampling required per Rule 609				
WILDLIFE				
☐ This location is included in a Wildlife Mitigation Plan				
☐ This location was subject to a pre-consultation meeting with CPW held on				
This location was subject to a pre-consultation meeting with or where on				
DESIGNATED SETBACK LOCATION EXCEPTIONS				
Check all that apply:				
Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area				
Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)				

Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit				
construction after Location approval)				
Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)				
Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)				
ULE 502.b VARIANCE REQUEST				
Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number				
ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. vaivers, certifications, SUAs).				
PERATOR COMMENTS AND SUBMITTAL				
omments The Little Rush 4-65 28 1V (05-005-07270) is on the Rush pad but is producing from the Cottonwood Creek DSU. The Rush 4-65 29-30 5H_D (05-005-07264) APD has been abandoned.				
This Form 2A is being submitted to amend the existing Location #449806 in order to expand the existing location to accommodate the addition of 7 wells, as well as production equipment.				
The newly installed facility will not have a flare installed. The flare listed in the facility portion of this permit is in reference to the existing flare on site to service the Rush 4-65 29-30 3AH.				
"Other" documents attached include original SWMP plan for well site as well as proof of renewal. Additional "Other" documents include the agreed upon Operator Agreement and associated BMP's between ConocoPhillips and City of Aurora.				
Correspondence with the Surface Owner indicates that the currently platted subdivision within 1500 feet of the proposed amended Location will be abandoned and it is the intent of the Surface Owner to move toward a new development plan. See Attachment Document #1010800.				
Parcel 1977-00-0-01-157 is owned by Thomas and Kimberly Rains, and the house located on the parcel is currently vacant. ConocoPhillips first contacted the Rains in 2015 prior to commencement of the initial operations at the Rush South site. The Rains did not raise any concerns about the operations or the location of the access road at that time. ConocoPhillips has made additional contact with the Rains, and they did not express any concerns.				
Operator provided Correspondence (Doc #1010801) from attorney, John Wood, dated April 2, 2019, pertaining to the House located on parcel 1977-00-0-0364 stating that the house (A/K/A 2090 S. Powhaton Rd.) is unsuitable for use as a place of residence and is currently only used for storage. Further, at this time or any time in the future, the property owner has no intention of rehabilitating the house for use as a residence.				
Based on the results of the modeled receptor locations within the noise model conducted by Burlington Resources, the Rush South wellsite is predicted to comply with the A-weighted and C-weighted COGCC noise limits without the use of noise mitigation. However, sound walls will be used throughout drilling and completion operations.				
An open house was hosted in Aurora on August 6, 2019 to provide site specific information to all community members within a 1 mile radius of this well site.				
I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.  Signed: Date: _09/21/2019 _ Email: _LARRY.R.SMITH@CONOCOPHILLIPS.COM				
Print Name: LARRY SMITH Title: REGULATORY COORDINATOR				
Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.				
COGCC Approved: Director of COGCC Date: 1/23/2020				

## **Conditions Of Approval**

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

OA	<u>Type</u>	<u>Description</u>
		Best Management Practices
<u>No</u>	BMP/COA Type	Description
1	Planning	Visual mitigation will include the use of low profile tanks (maximum height of 16 feet). Upon completion of interim reclamation, Operator will install an opaque, visual mitigation lansdcape wall constructed to a height of 8 feet.
2	Material Handling and Spill Prevention	All facilities will be equipped with remote monitoring and remote shut down, which includes isolation at the well head. Engineered liner systems will be used in secondary steel containment systems for tank batteries. Pollution control containers (spill boxes) will be used on truck loading lines and placed within the limits of the secondary containment system. Automatic shutdown level devices will be installed on each tank with remote monitoring capabilities. Automatic shutdown level devices will be installed on all pressure vessels and liquid knockouts. Automatic shutdown pressure devices will be installed on flowlines from well heads to facilities with remote monitoring capabilities. Additionally, cathodic protection will be used on buried steel lines to mitigate corrosion. Automatic shutdown pressure devices will be installed on process vessels with remote monitoring capabilities.
3	Material Handling and Spill Prevention	Operator will install Liquid Level High Kills to prevent liquids from exiting a given vessel via a gas stream due to improper equipment for the process medium in the pipe.
		Operator will set the Pressure High kills to shut-down the site at approximately 80% of max allowable working pressure of each vessel, which shuts down the site before PSVs relieve to the atmosphere.
		Operator will use pressure low site shut-downs to prevent gas or vapor spills and prevent liquid spills.
		Along with automated shut-downs we have preventative maintenance and best practices in place to prevent leaks from vessels. These include:  • Yearly shut-downs and visual inspections of each 2-phase and 3-phase vessel on site
		• Yearly NDT (Non-Destructive Testing) of each 2-Phase and 3-Phase vessel shell and head on site o Vessels that fail this test are removed from service
		Conservative corrosion allowances
		Internal coating to prevent corrosion     Semi-Annual PSV testing
		• Weekly environmental checks by operations personnel (weekly at a minimum, usually every 1-2 days per site)
		<ul> <li>NDT of all water piping to prevent leaks due to corrosion</li> <li>NDT spot checking of various flowlines to monitor for thin walled piping due to erosion or corrosion</li> </ul>
		<ul> <li>Yearly test of all devices that shut down the facility (including the 4 shut-down devices listed above)</li> <li>The above best management practices are similar to those utilized by PSM facilities</li> </ul>
4	Material Handling and Spill Prevention	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 Location. 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.
5	Dust control	Disturbed soil will be wetted using fresh water and/or tackifers. Construction operations will not occur during windy weather conditions. The Location will be downsized with disturbed areas reclaimed, re-seeded, and vegetated and the active footprint of the pad will be compacted and covered with gravel to prevent dust.
6	Noise mitigation	Operator will use noise mitigation sound walls during the drilling and completion phases for the Location.

7	Emissions mitigation	Combustors will be available at the Location during the entire production phase to eliminate fugitive emissions in the event of maintenance or emergency use. 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.
8	Emissions mitigation	Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.
9	Odor mitigation	Odor: Closed loop systems will be used. Operator will repsond to complaints from BU within 1,500 feet in 24-hours to mitigate odor based on specific circumstances.
10	Drilling/Completion Operations	Lighting: Operator will use lighting during Drilling/Completion phases only. All lighting will be capable of being directed inward to the Location and downcast to prevent light shining beyond the Location boundary. Permanent lighting will not be installed at the Location.
11	CPW-Wildlife - Minimization-Burrowing Owl	The operator will preclude new oil and gas operations within any active or inactive prairie dog colonies between March 15-October 31
12	CPW-Wildlife - Minimization-Burrowing Owl	If during the survey an active burrowing owl nest site is located the operator agrees to conduct surface disturbance a minimum 300 feet from the active nest site
13	CPW-Wildlife - Minimization-Burrowing Owl	If new oil and gas operations must occur within any active or inactive prairie dog colonies (with documented justification), between March 1-October 31, then the operator will survey the prairie dog colonies using CPW's recommended survey protocol and actions to protect nesting Burrowing Owls.

Total: 13 comment(s)

## **Attachment Check List**

Att Doc Num	<u>Name</u>
1010800	CORRESPONDENCE
1010801	CORRESPONDENCE
1347745	OBJECTIVE CRITERIA MEMO
1347750	OTHER
402147964	FORM 2A SUBMITTED
402147988	MULTI-WELL PLAN
402147989	ACCESS ROAD MAP
402147991	NRCS MAP UNIT DESC
402147993	HYDROLOGY MAP
402147994	LOCATION DRAWING
402147995	LOCATION PICTURES
402149624	OTHER
402149631	OTHER
402184449	OTHER
402184450	30 DAY NOTICE LETTER
402234081	SURFACE AGRMT/SURETY

Total Attach: 16 Files

## **General Comments**

User Group	Comment	Comment Date
Permit	Removed withdrawn hearing application docket number with Operator concurrence. Corrected number of wells on Facilities with Operator concurrence.	01/21/2020

OGLA	Per request, Operator provided the following information; changes were made with operator	01/02/2020
	concurrence:  - Confirmed the distance from planned Well (Rush 4-65 29-30 4DH) was 1,222 feet and from Production Facility was 782 feet to Adams-Araphoe School District #28 Property Line. This is to Parcel #005-1977-00-0-00-073 encompassing approximately 1.00 acre on the north side of East Yale Avenue.  - Operator notified Adams-Arap School District #28 on August 22, 2019 by Certified Mail of oil and gas operations in proximity to Parcel #005-1977-00-0-00-073.  - Removed "Cornfield" since the Land Use for the Location was identified as Cropland.  - Removed "State" from the Floodplain Data Sources Reviewed as the COGIS floodplain data layer was obtained from Federal (FEMA) source.  - Adopted Operator's Wildlife Minimization BMP for the Burrowing Owl and CPW survey protocol  - Modified BMPs for Liquid Level Kills, Pressure Kills and Emissions.  - Added additional pipeline information on Facilities tab.  - Corrected distance to nearest High Occupancy Building Unit, Designated Outside Activity Area, public road, and aboveground utility.  - Corrected distance to nearest water well.	
OGLA	The Objective Criteria Review Memo (Doc# 1347745) is attached to this Form 2A. Following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.	12/23/2019
OGLA	Per Operator verification on December 13, 2019:  - Confirmed an oil pipeline will be installed at the Location to reduce truck traffic.  - Confirmed that thief hatches would be sealed on the tanks to reduce emissions, and clarified that tanks will be equipped with gauges.  - Confirmed a natural gas pipeline will be used to transfer gas from the Location.  - Confirmed that the Operator will use Group I Oil Based Fluids for drilling.	12/18/2019
OGLA	<ul> <li>Operator provided Correspondence (attached Doc #1010801) pertaining to the House located on parcel 1977-00-0-00-364 stating that the house (A/K/A 2090 S. Powhaton Rd.) is unsuitable for use as a place of residence and is currently only used for storage. Further, at this time or any time in the future, the property owner has no intention of rehabilitating the house for use as a residence.</li> <li>Modified Operator BMPs and added Dust, Lighting and Odor BMPs with operator concurrence.</li> </ul>	12/18/2019
OGLA	COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria # 2, #3, #4, #5.c, #8	12/18/2019
OGLA	Changed Local Government Information to Municipality (Aurora); Added Siting Permit Type; Changed Status to APPROVED; Added approval date.  Changed the estimated dates of construction and interim reclamation based on the timeline provided by the operator.  Added the following to the Submit Tab per operator: Correspondence with the Surface Owner indicates that the currently platted subdivision within 1500 feet of the proposed amended Location will be abandoned and it is the intent of the Surface Owner to move toward a new development plan. See Attachment Document #1010800.  Parcel 1977-00-0-00-157 is owned by Thomas and Kimberly Rains, and the house located on the parcel is currently vacant. ConocoPhillips first contacted the Rains in 2015 prior to commencement of the initial operations at the Rush South site. The Rains did not raise any concerns about the operations or the location of the access road at that time.  ConocoPhillips has made additional contact with the Rains, and they did not express any	11/20/2019
Permit	concerns.  Multi-well plan passed permit review.	11/06/2019
Permit	Uploaded the redacted version of the SUA from the operator.	10/17/2019
Permit	This form has passed completeness.	09/30/2019

Total: 10 comment(s)	