

FORM
2A

Rev
01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402695913

Date Received:

06/16/2021

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID: **481716**

OGDP ID: **480998**

Expiration Date: **02/23/2025**

☒ New Location ☐ Refile ☐ Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210600096		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
480998	Sammons Ranch

CONSULTATION

- ☐ This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
- ☐ This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
- ☐ This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
- ☐ This Location includes a Rule 309.e.(2).E variance request.
- ☐ This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 10267

Name: VECTA OIL & GAS LTD

Address: 575 UNION BLVD #208

City: LAKEWOOD State: CO Zip: 80228

Contact Information

Name: Mathew Goolsby

Phone: (303) 618-7736

Fax: ()

email: mdgoolsby@comcast.net

FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20210089 ☐ Gas Facility Surety ID (Rule 711): _____
- ☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: Sammons Number: 315315A

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NWNW Section: 15 Township: 31S Range: 53W Meridian: 6 Ground Elevation: 5566

Latitude: 37.347800 Longitude: -103.350630

GPS Quality Value: 6.0 Type of GPS Quality Value: PDOP Date of Measurement: 02/25/2021

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 #



RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: LAS ANIMAS Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. No

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted: 01/25/2022

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: In Process

Status/disposition date: _____

If Relevant Local Government permit has been approved or denied, attach final decision document(s).

Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Robert Lucero, Land Use Officer Contact Phone: 719.845.2577

Contact Email: robert.lucero@lasanimascounty.org

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted: _____

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location: _____

Status/disposition Date: _____

If Federal agency permit has been approved or denied, attach the final decision document(s).

Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: _____ Contact Phone: _____

Contact Email: _____ Field Office: _____

Additional explanation of local and/or federal process:

LOCAL GOVERNMENT INFORMATION:

Vecta Oil and Gas, Ltd (Vecta) provided 30-day notice to Las Animas County on February 21, 2021. Vecta has been in communication with the county regarding local permitting. At the county's direction, we will provide Form 2A data after submittal to the COGCC. County permitting consists of a 14-day administrative review.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation: _____

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation: _____

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? No

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- | | |
|---|--|
| ☐ i. WPS < 2,000 feet from RBU/HOBU | ☐ vi.aa. WPS within a surface water supply area |
| ☐ ii. WPS < 2,000 feet from School/Child Care Center | ☐ vi.bb. WPS < 2,640 feet from Type III or GUDI well |
| ☐ iii. WPS < 1,500 feet from DOAA | ☐ vii. WPS within/immediately upgradient of wetland/riparian corridor |
| ☐ iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA | ☐ viii. WPS within HPH and CPW did not waive |
| ☐ v. WPS within a Floodplain | ☐ ix. Operator using Surface bond |
| | ☐ x. WPS < 2,000 feet from RBU/HOBU/School within a DIC |

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: ☐

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

< No row provided >

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Monte SammonsPhone: 719.643.5405Address: 23200 County Rd 199.1

Fax: _____

Address: _____

Email: triangle4@hotmail.comCity: Kim State: CO Zip: 81049Surface Owner at this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ IndianCheck only one: ☐ The Operator/Applicant is the surface owner.☒ The Operator has a signed Surface Use Agreement for this Location – attach SUA.☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.Surface Owner protection Financial Assurance type: N/A Surety ID Number: _____Mineral Owner beneath this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ IndianMinerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: YesLease description if necessary: All the S/2 Section 10, T31S, R53W, and all the W/2 Section 15, T31S, R53W, 6 PM.**SITE EQUIPMENT LIST**

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

Wells	<u>1</u>	Oil Tanks	<u>0</u>	Condensate Tanks	<u>0</u>	Water Tanks	<u>0</u>	Buried Produced Water Vaults	<u>0</u>
Drilling Pits	<u>0</u>	Production Pits	<u>0</u>	Special Purpose Pits	<u>0</u>	Multi-Well Pits	<u>0</u>	Modular Large Volume Tank	<u>0</u>
Pump Jacks	<u>0</u>	Separators	<u>0</u>	Injection Pumps	<u>0</u>	Heater-Treaters	<u>0</u>	Gas Compressors	<u>0</u>
Gas or Diesel Motors	<u>0</u>	Electric Motors	<u>0</u>	Electric Generators	<u>0</u>	Fuel Tanks	<u>0</u>	LACT Unit	<u>0</u>
Dehydrator Units	<u>0</u>	Vapor Recovery Unit	<u>0</u>	VOC Combustor	<u>0</u>	Flare	<u>0</u>	Enclosed Combustion Devices	<u>0</u>
Meter/Sales Building	<u>0</u>	Pigging Station	<u>0</u>	Vapor Recovery Towers	<u>0</u>				

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Well Head	<u>1</u>

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Temporary Rig Fuel Tank	<u>1</u>
30 day diesel genset for well devel	<u>1</u>

GAS GATHERING COMMITMENTOperator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

4" diameter HDPE underground flowline for inert helium gas

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply):				
				604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	5280 Feet		SW					
Residential Building Unit (RBU):	5280 Feet		SW	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280 Feet		S	☐	☐	☐		☐
Designated Outside Activity Area:	5280 Feet		S					
Public Road:	1210 Feet		W					
Above Ground Utility:	1290 Feet		W					
Railroad:	5280 Feet		W					
Property Line:	2470 Feet		E					
School Facility:	5280 Feet		S					
Child Care Center:	5280 Feet		S					
Disproportionately Impacted (DI) Community:	5280 Feet		W					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet		W	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	0	0
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 1.10

Size of location after interim reclamation in acres: 0.20

Estimated post-construction ground elevation: 5566

DRILLING PROGRAM

Will a closed-loop drilling system be used? No

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: _____

Drilling Fluids Disposal Method: _____

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

1) Well will be drilled with air. NO DRILLING MUD WILL BE USED.

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: _____

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

Rangeland

Describe the Relevant Local Government's land use or zoning designation:

Agricultural

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

Rangeland

Reference Area Latitude: 37.347800

Reference Area Latitude: -103.349950

Provide a list of plant communities and dominant vegetation found in the Reference Area.

Plant Community	Dominant vegetation
Disturbed Grassland	Western Wheatgrass
Disturbed Grassland	Red Threeawn
Disturbed Grassland	Blue Grama
Disturbed Grassland	Buffalo Grass

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at <https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/> or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: WC - Plughat-Villegreen Complex

NRCS Map Unit Name: BaA - Baca Silt Loam

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 2800 Feet NW

Spring or Seep: 5280 Feet NE

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 168 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Well No. 246019-A was drilled in Section 11 to 35' with a static water level of 19'. Well No. 80461-A was drilled in Section 14 to 100' with a static water level of 15'. These wells are not representative. The wells were drilled approximately 130' lower in elevation than Sammons Ranch in creek bottom lands adjacent to Twin Butte Creek.

A more representative Well No. 251880 in Section 9 was drilled to 160' but was a dry hole. A representative well, Well No. 306362 in Section 13, was drilled to 200' with a static water level of 140'. Since this static water level is approximately 28' lower in elevation than Sammons Ranch, Vecta estimated the approximate depth to groundwater at Sammons Ranch as 168'.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 5280 Feet SE

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? _____

Provide the distance and direction to the nearest downgradient wetland, measured from the Working

Pad Surface: 5280 Feet SE

Provide a description of the nearest downgradient surface Waters of the State:

The nearest downgradient surface waters of the state is Two Butte Creek, an intermittent stream. An ephemeral feature upstream of Two Butte Creek is heavily disturbed from historical cattle grazing.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

☒ Federal (FEMA) ☒ State ☒ County ☐ Local

☐ Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? No

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- ☐ This location is included in a Wildlife Mitigation Plan
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- ☐ A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: _____

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- ☐ The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- ☐ The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- ☐ The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.

- ☐ The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- ☐ The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- ☐ The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- ☐ The applicant has obtained a Rule 1202.a CPW waiver.
- ☐ The applicant has obtained a Rule 1202.b CPW waiver.
- ☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

No HPHs apply to this location, access roads, or flowline corridor.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: \$ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

No HPHs apply to this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: \$ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? No

Operator Proposed BMPs

No	BMP Target	CDPHE Recommendation	COGCC Action
1	Air		
	Description	Operator will properly maintain vehicles and equipment	
	CDPHE Comment		
2	Water		
	Description	Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations	
	CDPHE Comment		
3	Waste		
	Description	Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream)	
	CDPHE Comment		

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 13

- ☐ (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- ☐ (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- ☐ (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- ☐ (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- ☒ (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- ☒ (6) Transportation Plan
- ☒ (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- ☒ (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- ☐ (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- ☐ (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- ☒ (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- ☒ (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- ☒ (13) Fluid Leak Detection Plan
- ☒ (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- ☒ (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- ☒ (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- ☒ (17) Wildlife Plan consistent with the requirements of Rule 1201
- ☒ (18) Water Plan
- ☒ (19) Cumulative Impacts Plan

☐ (20) Community Outreach Plan

☐ (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

☐ This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission

Order number: NO

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

☐ 304.b.(1). Local Government Siting Information

☐ 304.c.(1). Emergency Spill Response Program

☐ 304.b.(2). Alternative Location Analysis

☒ 304.c.(2). Noise Mitigation Plan

☐ 304.b.(3). Cultural Distances

☒ 304.c.(3). Light Mitigation Plan

☐ 304.b.(4). Location Pictures

☐ 304.c.(4). Odor Mitigation Plan

☐ 304.b.(5). Site Equipment List

☐ 304.c.(5). Dust Mitigation Plan

☐ 304.b.(6). Flowline Descriptions

☐ 304.c.(6). Transportation Plan

☐ 304.b.(7). Drawings

☐ 304.c.(7). Operations Safety Management Program

☐ 304.b.(8). Geographic Information System (GIS) Data

☐ 304.c.(8). Emergency Response Plan

☐ 304.b.(9). Land Use Description

☐ 304.c.(9). Flood Shut-In Plan

☐ 304.b.(10). NRCS Map Unit Description

☐ 304.c.(10). Hydrogen Sulfide Drilling Operations Plan

☐ 304.b.(11). Best Management Practices

☐ 304.c.(11). Waste Management Plan

☐ 304.b.(12). Surface Owner Information

☐ 304.c.(12). Gas Capture Plan

☐ 304.b.(13). Proximate Local Government

☐ 304.c.(13). Fluid Leak Detection Plan

☐ 304.b.(14). Wetlands

☐ 304.c.(14). Topsoil Protection Plan

☐ 304.b.(15). Schools and Child Care Centers

☐ 304.c.(15). Stormwater Management Plan

☐ 304.c.(16). Interim Reclamation Plan

☐ 304.c.(17). Wildlife Plan

☐ 304.c.(18). Water Plan

☐ 304.c.(19). Cumulative Impacts Plan

☐ 304.c.(20). Community Outreach Plan

☐ 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments

Vecta O&G, Ltd. proposes to develop up to 4 exploratory (wildcat) conventional vertical helium gas wells, flowlines, and access on existing disturbed rangeland in rural Las Animas County. The development avoids impacts to public health, safety, welfare, the environment, and wildlife by exhibiting the following:

- (1) Inert helium gas extraction with no known oil or natural gas entrained with the helium resource. The finding is based on historical well log and scout information for this location.
- (2) No hydrocarbons or hazardous air pollutants associated with the helium gas wells.
- (3) The nearest residence is approximately 0.75 miles away from the nearest Sammons Ranch well (315315C).
- (4) Each well pad contains a single well with 160-acre pad spacing.
- (5) Well pad footprints are limited to approximately 1.1 acres during 7-10 days of drilling and will be reclaimed to approximately 0.2 acres during interim reclamation.
- (6) Conventional vertical well drilling requires no fracking or proppant.
- (7) The wells generate no produced water. There is no on-site storage of produced water, oil, natural gas, or condensate.
- (8) The nearest waterbody is > 0.5 mi away.
- (9) There is no high priority habitat or mapped species of concern within 1 mile.

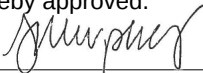
Wells have been planned to be on center in a quarter section. All of the drawings submitted with the application indicate that the well is on center. However, the well plots in the following quarter-quarter section: NW ¼ NW ¼, Section 15.

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

Signed: _____ Date: 06/16/2021 Email: mdgoolsby@comcast.net

Print Name: Mathew Goolsby Title: Vice President-Operations

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: 3/8/2022

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.

Condition of Approval

COA Type

Description

Planning	Within 30 days of receipt of the approved local permit, Operator will submit the approved permit via Form 4 Sundry.
Planning	Operator will submit a Form 4 Sundry to include Reference Area Pictures consisting of 5 color photographs of the Reference Area, including 4 taken from each cardinal direction, and 1 taken from above the Reference Area. Each photograph will be identified by date taken, Well or Oil and Gas Location name, and direction of view. The photographs will be taken during the peak growing season and will clearly depict vegetation cover and diversity. These photographs may be submitted at any time up to twelve (12) months after the approval of this Form 2A.
2 COAs	

Best Management Practices

No BMP/COA Type

Description

1 Traffic control	• Drivers will observe posted speed limits to protect public and driver safety. • Drivers will observe posted speed limits on unpaved roads to avoid or minimize fugitive dust. • Drivers will be instructed to maintain vehicle speeds of 15 mph on unpaved roads. • Drivers will cover and secure loads to prevent debris from entering roadways. • Vehicles will be maintained in good working condition to avoid excess emissions and safety concerns.
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2	Storm Water/Erosion Control	Structural • Wattles or silt fence will be placed on the downgradient side of the Oil and Gas Location. • Stormwater diversions will be created when there is evidence of ponding or erosion runnels. • The temporary fuel tank used for well drilling will have integrated secondary containment. The drill rig and motors will have liners underneath. Non-Structural • Waste materials will be bagged or containerized to avoid contact with precipitation. • The well pad will be inspected for excessive erosion. Where needed, areas will be recompact. • Vehicles and equipment will be monitored for leaks during well development. • Ingress, egress, and parking will occur in designated areas. • Spill response materials and absorbents will be containerized and available on site. • The location will be inaccessible to the public to prevent unauthorized access and excessive wear on access roads. • Stabilization and revegetation will be performed as part of interim reclamation. • During well development, stormwater monitoring will be performed daily. Areas that require correction for stormwater control will be addressed or repaired promptly. • During production, an operator will be onsite an estimated 2-3 times per week. Site inspection will identify areas that require maintenance or repair to control stormwater and correct excessive erosion on the well pad or access roads. Stormwater inspection will be performed at least every 7 days during well production and every 30 days after interim reclamation.	
3	Material Handling and Spill Prevention	• Site personnel will be trained in detecting and addressing spills that may occur on site. • Spills or releases will be investigated, controlled, or contained, in accordance with Rule 912.a. • If a spill or release meets criteria in Rule 912.b, it will be reported as specified in the rule. • A catastrophic loss of freshwater will be bermed using the skid steer available on site. • Equipment and transfer lines will be monitored daily during well drilling and completion for signs of drips, leaks, or spills, which will be promptly corrected. • Flowlines will be installed consistent with Rule 1102. In accordance with Rule 1104, before a flowline is put into service, it will be pressure tested to maximum pressure for AVO leak detection. • The operator will maintain shutoff valves on helium gas flowlines in accordance with Rule 1103.a. • Per Rule 1104.c, the operator will conduct a monthly AVO survey to detect failures or signs of leaks from the wellhead and flowline. • The operator will conduct annual flowline integrity testing in accordance with Rule 1104.f. • Site personnel will be instructed on procedures for documenting and recordkeeping inspections and testing.	

4	Dust control	Speed Restrictions • Speeds will be limited to 15 mph on the Sammons Ranch access roads. Regular Road Maintenance • Regular inspection will occur for the Sammons Ranch access roads for evidence of inadequate drainage and formation of potholes. • Grading, blading, and filling potholes will be performed to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion. Restricting Construction Activity During High Wind Days • The 1-day well pad construction will be scheduled to avoid high-wind warnings issued for eastern Las Animas County. Phase Truck Trips Construction (Total) 2 Drilling (Total) 12 Completion (Total) 12 Production (Per Month) 30 Dust Suppression • Blowing soil and failure of the soil to stabilize and form a crust on the location during construction and after interim reclamation will indicate that a dust suppression BMP is needed. In that event, a water truck will be used to wet the pad surface to form a crust. Interim Reclamation • Area not needed for production will be reclaimed in accordance with Rule 1003. Dust Tracking • Aggregate will be placed at the apron where the Sammons Ranch access road ties into Highway 109. The aggregate will serve as a wheel shaker to reduce dirt from being tracked onto the paved road. Topsoil Stockpile • The stockpile will be mounded with a slope of approximately 1:3 to prevent loose soils and promote vegetative growth. • Vehicle tracking perpendicular to the slope angle will be used to improve short term stabilization. • Vegetation will be allowed to establish, with crimped straw mulching, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity.	
5	Interim Reclamation	Topsoil Protection Short-Term • Vegetation removal and soil disturbance on the Oil and Gas Location will be minimized to the area sufficient to site and level a water well-sized drill rig and equipment for shallow vertical well drilling. • The operator will salvage and segregate topsoil based on soil characteristics of texture, color, structure, consistency, and organic matter. • Salvaged topsoil will be mounded on the Oil and Gas Location with a slope of approximately 1:3. • Vehicle tracking perpendicular to the slope angle will be used to improve short term stabilization. • Topsoil will be protected from contamination by stockpiling it in a location free from drilling, fuel storage, and parking. • Soil removed during flowline trenching will be segregated based on changes in physical characteristics. The soil layers will be windrowed adjacent to the trench. • Soils from the flowline trench will be replaced promptly in the same order in which they were removed. Long-Term • The topsoil stockpile will be protected from compaction by designating it with surveyor staking and flagging as topsoil for reclamation. • The topsoil stockpile will be protected from wind degradation by mounding at an approximately 1:3 steepness to prevent loose soils while promoting continued microbial activity. • The topsoil stockpile will be protected from erosion by ensuring that stormwater controls and diversions are installed, as needed, to divert stormwater away from the stockpile. • Vegetation will be allowed to establish, with crimped straw mulching, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity. • The duration of stockpiled topsoil is not anticipated to exceed one growing season because the Oil and Gas Location will support a single vertical helium gas well. Reclamation will occur during the first growing season after the well is drilled.	

6	Interim Reclamation	• Topsoil - Topsoil will be stockpiled on the location and will be restored on the reclaimed area. Salvaged topsoil will be replaced and contoured to maximize erosion control and soil stability. • Erosion control – Erosion controls will be installed and maintained to prevent stormwater runoff and erosion. Erosion controls are shown on Form 2A, Construction Layout Drawing and Facility Layout Drawing. • Weed control – The location will be monitored for the presence of invasive weeds. Invasive weeds will be treated to prevent them from establishing. • Seed mix – The operator will use the certified weed-free seed mix identified by NRCS and approved by the landowner. • Seeding method and Timing – Drill seeding or other method appropriate to promote vegetative success will be conducted during the first favorable growing season after well drilling is complete. • Fencing – Fencing will be installed around the wellhead. • Recontouring - Disturbed areas will be recontoured to blend with the pre-disturbance surface and restore natural drainage patterns. • Monitoring – The location will be monitored for vegetative success. It will be reseeded where needed to establish 80 percent of pre-disturbance cover.
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Total: 6 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
1347863	CULTURAL FEATURES MAP
1347864	NRCS MAP UNIT DESC
1347865	LOCATION PICTURES
2369381	SURFACE USE AGREEMENT
2369385	CORRESPONDENCE
2369388	DIRECTOR'S RECOMMENDATION
402695913	FORM 2A APPROVED
402696336	SURFACE AGRMT/SURETY
402696343	CORRESPONDENCE
402696419	MINERAL LEASE MAP
402709858	LOCATION DRAWING
402709861	ACCESS ROAD MAP
402709868	REFERENCE AREA MAP
402802455	HYDROLOGY MAP
402802457	RELATED LOCATION AND FLOWLINE MAP
402802460	LAYOUT DRAWING
402802461	PRELIMINARY PROCESS FLOW DIAGRAMS
402802462	LESSER IMPACT AREA EXEMPTION REQUEST
402822083	GEOLOGIC HAZARD MAP
402824191	WILDLIFE HABITAT DRAWING
402833978	LOCATION AND WORKING PAD GIS SHP
402977577	FORM 2A SUBMITTED
402977581	PUBLIC COMMENT-0

Total Attach: 23 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	OGDP ID# 480998 and this form are approved by Commission Order Number 573-1.	03/03/2022
OGLA	The Director has determined that the OGD application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	01/28/2022
OGLA	Updated requested information from 1/7 and 1/20. Received and attached updated SUA information. Received verbal concurrence to change depth to water description and add temporary fuel tank to equipment.	01/28/2022
OGLA	Additional Information Requested on: 8. Plugging and Abandonment Bond 9. Relevant Local Government permit application. 10. Surface Use Agreement 11. Depth to water. 12. CDPHE BMPs 13. Verification of distances to property lines. 14. Verification of distances to surface waters.	01/20/2022
OGLA	Additional information requested from operator for: 1. Dust Mitigation Plan tracking BMP 2. Water Plan water source 3. Water Plan water storage 4. Cumulative Impacts Plan. Foraging animal and migratory bird pathway impacts. 5. Cumulative Impacts Plan. Soil impacts. 6. Location Pictures. Include aerial image with field of view of photos. 7. NRCS Map Unit Description. Remove excess soil types.	01/07/2022
OGLA	The Director has determined this OGD application is complete. Form pushed to IN PROCESS.	10/28/2021
OGLA	Lesser Impact Area exemption from Rule 304.c.(2) Noise Mitigation Plan. The Director granted the exemption request on October 21 based on the distances to RBUs, the short duration of construction and drilling activities, and the plans for daylight only construction. The operator must comply with the noise levels specified in Rule 423-1.	10/28/2021
OGLA	Lesser Impact Area exemption from Rule 304.c.(3) Light Mitigation Plan. The Director granted the exemption request on October 21 based on the distances to RBUs, the short duration of construction and drilling activities, and the plans for daylight only construction.	10/28/2021
OGLA	This Form has been returned to Draft for the following: 1. Revision to Topsoil Protection Plan 2. Revision to Cumulative Impacts Plan 3. GIS shape file upload.	10/01/2021
OGLA	This Form has been returned to Draft for the following: 1. Revisions to multiple attachments. 2. Revisions to multiple plans. A spreadsheet with the issues listed above was created and sent to the operator.	07/16/2021

Total: 10 comment(s)