

BP America Production Company
380 Airport Rd
Durango, Colorado 81303

January 5, 2016

La Plata County Planning Department
Attention: Oil and Gas Planner
1060 E. 2nd Ave.
Durango, CO 81301

Re: Rhodes 1 well
SENW Section 7U, T34N, R6W N.M.P.M.

Enclosed:
Application Processing Fee: \$1,300
La Plata County Minor Oil & Gas Facility Permit Application

To Whom It May Concern:

Per the attached application, BP plans to expand the existing State GC MZ1R well-site to accommodate the proposed Rhodes 1 well.

Visual mitigation will consist of painting all surface equipment a uniform green tone, commonly known as Juniper green which is slightly darker than the surrounding vegetation. Standard reclamation will consist of 3:1 or flatter slopes, rounded grade changes, rounded corners and seeding and mulching of the interim areas. The TUA and newly disturbed area will be re-seeded with an appropriate seed mix that is suitable for the surrounding range grassland habitat. Re-vegetation and reclamation activities follow the Natural Resources Conservation Services (NRCS) guidelines posted on the La Plata County web site.

The Colorado Department of Parks and Wildlife has been notified of the planned well site. This well is covered in the Wildlife Mitigation Plan (MWP) dated March 2011 between BP America Production Company and Colorado Department of Parks and Wildlife.

COGCC permits have been processed and this well has been assigned with API# 05-067-09955.

Please call me if you have any questions or need additional information.

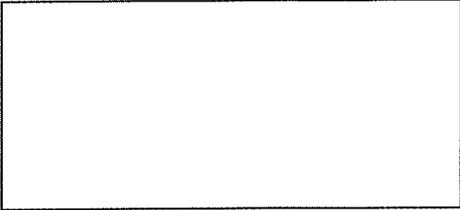
Sincerely,

Naomi Azulai
Well Permitting Analyst
(970) 375-7511
Naomi.Azulai@bp.com

La Plata County Minor Oil and Gas Facility Application



Planning Department
1060 E. 2nd Ave.
Durango, CO 81301
http://co.laplata.co.us



-APPLICATION MUST BE SUBMITTED IN PERSON OR VIA U.S. MAIL
 -VERIFY FEES PRIOR TO SUBMITTING
 -PLEASE REFER TO CHAPTER 90 OF LA PLATA COUNTY
 LAND USE CODE

County Use Only – Date Received

Application Fees Submitted: \$ 1,300 Additional Fees Submitted: \$ _____
 Proposed Facility Name: Rhodes 1
 12 digit Parcel #: 589907300066 Sec., Twp, Rng.: Sec 7U, T34N, R6W
 Latitude (decimal degrees) 37.20805095 Longitude (decimal degrees) -107.54590750
 Measurements from Section Lines: 1,664 feet from the North Line and 1,935 feet from the East Line

Applicant: BP America Production Co. L48 Contact Person: Naomi Azulai
 Address: 380 Airport Road, Durango, CO 81303 Phone: 970-375-7511
 Designated Agent? Yes No (if Yes, please provide proof of designation)

Agent: _____ Contact Person: _____
 Address: _____ Phone: _____
 Emergency Contact: _____ Phone: _____

Surface Owner: Marcia M. Morales Revoc. Trust Surface Owner: _____
 Address: 5182 CR 523, Bayfield CO 81122 Address: _____
 Phone: 970-884-9843 Phone: _____

APPLICANT’S/AGENT’S CERTIFICATION OF COMPLIANCE:

I, _____, designated agent for _____ (Applicant), hereby certify that the information provided to La Plata County within and related/attached to this application complies with all La Plata County and State of Colorado regulations and is true and accurate. The Applicant will be held legally responsible for all acts, errors, and omissions arising from the development specified herein, and which is undertaken by the Applicant, Applicant’s Employees, and any independent contactors and subcontractors pursuant to the approval of the application by La Plata County. By signing this application in accordance with all of the regulations of the La Plata Land Use Code, I hereby authorize La Plata County Employees to inspect the site for the Proposed Facility at any time before approval or denial of this application and upon reasonable notice after approval of this application.
 Signature: _____ Date: _____

County Use Only Beneath This Line

Based on the information provided herein, this Minor Oil and Gas Facility Permit Application complies with Chapter 90 of the LPLUC and is hereby approved and permitted.

Permit/Project #: 2016-0050
 Name: Ashley Austin Title: Planner I
 Signature: *Ashley Austin* Date: 3/10/16

CONDITIONS OF APPROVAL: SEE ATTACHED

Section I: Facility Description/Environmental Quality

1. Emergency Preparedness Plan:

Emergency Preparedness Plan has been provided to Office of Emergency Management for the current year (90-51)? Yes No

* If your Emergency Preparedness Plan is not up to date, your application will be deemed incomplete

2. Performance Security:

Is performance security for this facility covered under a blanket bond (90-49)? Yes No

a. If Yes, please provide the following information. Additionally please submit one copy (one time) of the bond for the County's records:

- i. Financial Institution JP Morgan Chase
- ii. Dollar Amount of Bond \$175,000
- iii. Bond # TFTS-92423

b. If No, an individual facility bond will be required. Please submit a copy of the bond and provide the following information:

- i. Financial Institution _____
- ii. Dollar Amount of Bond _____
- iii. Bond # _____

3. Proposed Minor Facility

a. What is the primary function of the proposed Facility?

i. Is this Facility a Special Exception (90-125)? Yes No

* If the proposed facility is a production well and a Special Exception is being proposed, attach additional information as outlined in Section III (Supplemental Attachments), Item 1 to the permit application.

- Well Well with intermediate pipeline* Temporary storage yard (6 months or less)
- Well with special mitigation Water Pump Station (reclassified to minor facility)
- Other : _____

*If pipeline extends beyond ¼ notice area, a separate pipeline permit is required

b. If an intermediate pipeline is proposed please answer the following questions:

- i. Pipeline length and material _____
- ii. Lat & Long BOL: _____
- iii. Lat & Long EOL: _____

c. Well Formation and type:

- i. Formation:
 Fruitland CBM Conventional Other : _____
- ii. Type:
 Directional Horizontal Vertical

d. Is the new well being installed on an existing pad? Yes No

If Yes, please fill out the information below:

- i. What is the existing pad size (in acres): 0.802
- ii. What is the proposed expanded pad size including the Temporary Use Area: 0.763
- iii. What will the final pad size be after the TUA has been reclaimed: 1.022

e. Is distribution voltage (12.43 kV 3-phase power) within ¼ mile of the site? Yes No

f. Will the proposed facility be electrified (90-122(d)(2))? Yes No

If No, please fill out the information below:

i. What is the cumulative horsepower rating for all engines and motors for the proposed facility:

At sea level: _____

At facility elevation: 19 hp

ii. If distribution voltage is located within ¼ mile, and the site is not proposed to be electrified, please attach information demonstrating that such electrification is infeasible.

g. What is the proposed time on location for continuous drilling and completion activities (90-19 *minor facilities requiring special mitigation measures*):

4days continuous drilling. 45days intermittent completion including 4days 24hr* frac ops.

*24 hr frac operation during winter only.

h. List all equipment to be proposed onsite. Include number, size, type and model of equipment if known. A list may also be attached to the permit application. You will be required to submit a list of equipment that has been set on the location 18 months after the drilling and completion of the well, unless the well is a legal, non-conforming use (90-44e).

2 wellheads (Rhodes 1 and State GZ MZ1R), 1 gas driven beam pump unit (artificial lift), and 2 separators.
4 steel flowlines to the separators (two from each well), up to 4" diameter.
Up to 4" steel gas line from each separator (two) to the gas gathering line.
Up to 3" steel water line from each separator to the water gathering line.
1 electric control box/meter house.
1 95 bbl water tank.

4. Construction and drilling phase earthwork to be performed

a. What is the quantity of fill material to be brought to or removed from the site (90-41)?

Cut material: 11 cubic yards
Fill material: 4,221 cubic yards
Top soil: 616 cubic yards
There will be a net import of 4,826 cubic yards to the site.

5. Narrative

a. Generally describe the facility proposed, operating plan, # of vehicles, etc. (90-41).

Routine operational pick up trucks will consist of BP personnel accessing the site once or twice a week for routine maintenance and inspection.

6. Does the proposed facility have an associated MOU? Yes No

If yes, respond to the questions below:

- a. Which MOU with La Plata County (operator name and date) applies to the proposed facility? _____
- b. Which Road Maintenance Fee applies? Tier I Tier II Tier III No Tier
- c. What is the amount of the Fee? _____
- d. Is distribution voltage (12.43 kV 3-phase power) within ¼ mile of the site? Yes No

7. Setback Issues (90-122b)

- a. Are the following setback requirements met?
 - i. Residential setbacks of 500' from wellhead: Yes No
 - ii. Property line setbacks of 150' from wellhead: Yes No
 - iii. Road, Utility, etc. setbacks of 200' from wellhead: Yes No
 - iv. Pipeline setbacks of 50' from occupied structures: Yes No
- b. If any setbacks are not met:
 - v. Was the facility drilled prior to the adoption of Chapter 90? Yes No
* If yes, skip vi. and vii., below.
 - vi. Was a waiver requested by the applicant? Yes No
 - vii. Was a waiver granted by the surface owner? Yes No
If Yes, please attach the written waiver.
If No, please provide additional information in the narrative (item 5)

8. Access Roads (90-122(c) and 90-124(c))

- a. Does the Applicant have the legal right to use the access roads? Yes No
- b. Will private roads be used to access the proposed facility? Yes No
- c. If private roads will be used, does the Applicant have a signed road maintenance or improvement agreement? Yes No
If No, provide exhibits demonstrating the applicant attempted to negotiate an agreement for the road, to comply with the provisions of 90-122(c). Please attach to the permit.

9. Water Source (90-123(e))

- a. If fresh or potable water is proposed for use during construction, drilling, and completion, please provide the source of the water: Southern Ute Indian Tribe Water Distribution Facility- Ignacio, Co
- b. If the water source proposed for use is related to a decreed water right, please list the water rights case number associated with the decree: _____

10. Provide Driving directions to the proposed facility from Durango.

From the junction of HWY 172 & HWY 160, travel east on HWY 160 for 9.9 miles. Turn right onto HWY 160B for 1.5 miles. Turn right on CR 521 for 1.4 miles. Turn left on CR 523 for 2 miles, then continue on CR 523 my turning right for an additional 0.3 miles. Turn left onto access road for 0.2 miles.

Section II: Required Attachments

To utilize GIS/Aerial photography for requirements 1-5 below, go to the La Plata County GIS website

1. Surface Owner notifications (LPLUC 90-77, 90-41):

- a. Attach a copy of the letter that was sent to surface owners within ¼ mile of proposed facility, which is required to include the following information*:
 - i. Description of the proposed facility location (Township, Range, Section and parcel) and street address if available
 - ii. Identification of Applicant and Designated Agent including addresses and phone numbers
 - iii. Brief description of the proposed facility and equipment to be located on site once operational
 - iv. Anticipated permit application submittal date of the permit to La Plata County
 - v. Statement that “Subject to compliance with appropriate county regulations, La Plata County will typically approve this facility within 15 business days of its submittal if the application is complete and in compliance with county regulations. In order to ensure full consideration of public comment, comments on the proposed facility must be provided to the La Plata County Planning Department no later than 10 business days after the permit application submittal date”.
 - vi. Current address and telephone number of the La Plata County Planning Department
 - vii. Explanation that additional information regarding the application is available for review at the La Plata County Planning Department
 - viii. Statement that “county personnel may need to enter onto proposed well site property during review of the permit and thereafter upon notification”
 - ix. Statement that “Surface owners who receive this letter may request written notification from (Operator) of the commencement of construction and drilling operations. Notification regarding commencement dates for construction and for drilling operations (if the application is approved) can be obtained by submitting a request in writing to the Planning Department within 15 business days from the date of the application submittal”.
- b. Attach a list of notified surface owners, including the surface owner where the proposed facility is located, within ¼ mile of the proposed facility.
- c. Attach original certified mailing receipts matching the list of surface owners.

**Note that a sample letter is available online or by request, from the Planning Department*

2. Attach a copy of the letter that was sent to Division of Wildlife (LPLUC 90-123(d)(1)).

3. Attach a vicinity map containing the following (LPLUC 90-41):

- a. Appropriate standard scale (1” = 100’, 1” = 200’, etc.)
- b. Title block, key and north arrow
- c. Section, Township, Range
- d. Well pad boundary
- e. Proposed intermediate pipeline route (if applicable)
- f. Existing water/gas pipeline routes
- g. Current surface ownership of all properties within ¼ mile of the proposed facility(s)
- h. Existing and proposed access to proposed facility, showing how the existing/proposed access ties into a county road or state highway

- i. Setbacks from closest property boundary and closest occupied structure measured from the wellhead and intermediate pipeline.
- j. Irrigation ditches, streams and rivers within 100' of the proposed facility.

4. Attach a Site Plan containing the following (LPLUC 90-41):

- a. Appropriate standard scale (1" = 100'; 1" = 200', etc.)
- b. Title block, key and north arrow
- c. Section, Township, and Range
- d. Existing equipment and improvements associated with the existing well (wellhead, separators, graded areas, flowlines, powerlines, etc.)
- e. Proposed equipment and improvements associated with the proposed well (wellhead, separators, graded areas, flowlines, , etc.)
- f. Intermediate pipeline route(if applicable)
- g. Access road entrance onto the well pad
- h. Attachment showing cross-sections of cut and fill areas (Grading Plan).
- i. Irrigation ditches, streams, and rivers within 100' of the proposed facility.

5. Site Best Management Practices (BMP) Narrative and Map (LPLUC 90-41):

- a. Please provide a Site BMP Narrative as an attachment to this permit, explaining the interim reclamation, drainage structural features, and visual mitigation that will occur onsite.

- i. Please include:

- Visual Mitigation and Revegetation

- 1. Artificial lift equipment type (PC pumps, Beam lifts, Linear Rod pumps, etc.)
- 2. Equipment painting
- 3. Any additional visual mitigation techniques (berms, vegetation, etc.)
- 4. A seed mixture, and seeding rates if available
- 5. Seeding method and mulching (if applicable) to be conducted
- 6. Explain when the re-seeding will most likely occur
- 7. Explain the type of weed control to be used onsite or attach weed management plan that has been filed with the County Extension Office.

- Drainage management

- 8. The types of structural drainage features, if any, to be used around the location to prevent offsite impacts from erosion/flow. Please differentiate construction and permanent features.

- b. Please provide a Site BMP Map that corresponds with the information provided in the narrative (listed above).

- i. Please include:

- 1. Identify the location of the re-seeding on the Site BMP map
- 2. Identify the direction of drainage on the site plan of the runoff offsite and onsite, using arrows to show the direction of drainage. Display topographic lines if possible.
- 3. Identify the location(s) of the drainage features
- 4. Indentify the location(s) of any visual mitigation techniques

- c. If a narrative and map have already been created for the COGCC that are sufficient to meet the revegetation and/or drainage requirements of this plan, they may be submitted.

6. **Attach at least four color photographs shot from the center of the well site facing north, east, south, and west (LPLUC 90-41).**

Section III: Supplemental Attachments (If Applicable)

1. **If the proposed facility is a production well and is being proposed as a Special Exception (90-125) attach the following information:**
 - a. Narrative providing description of:
 - i. Obstacles to expanding existing pad(s)
 - ii. Efforts to overcome noted obstacles
 - b. Map showing:
 - i. Topographic characteristics of site
 - ii. Natural resources – such as wetlands
 - iii. Locations of utilities
 - iv. Limiting technical issues – such as geologic or topographic characteristics
 - v. Limiting site conditions – such as irrigation, setback issues, structures
 - vi. Safety issues
 - vii. Any other issues outlined in 90-123(4)
2. **If available, please attach a well location plat.**

Section IV: Follow-up Items Required

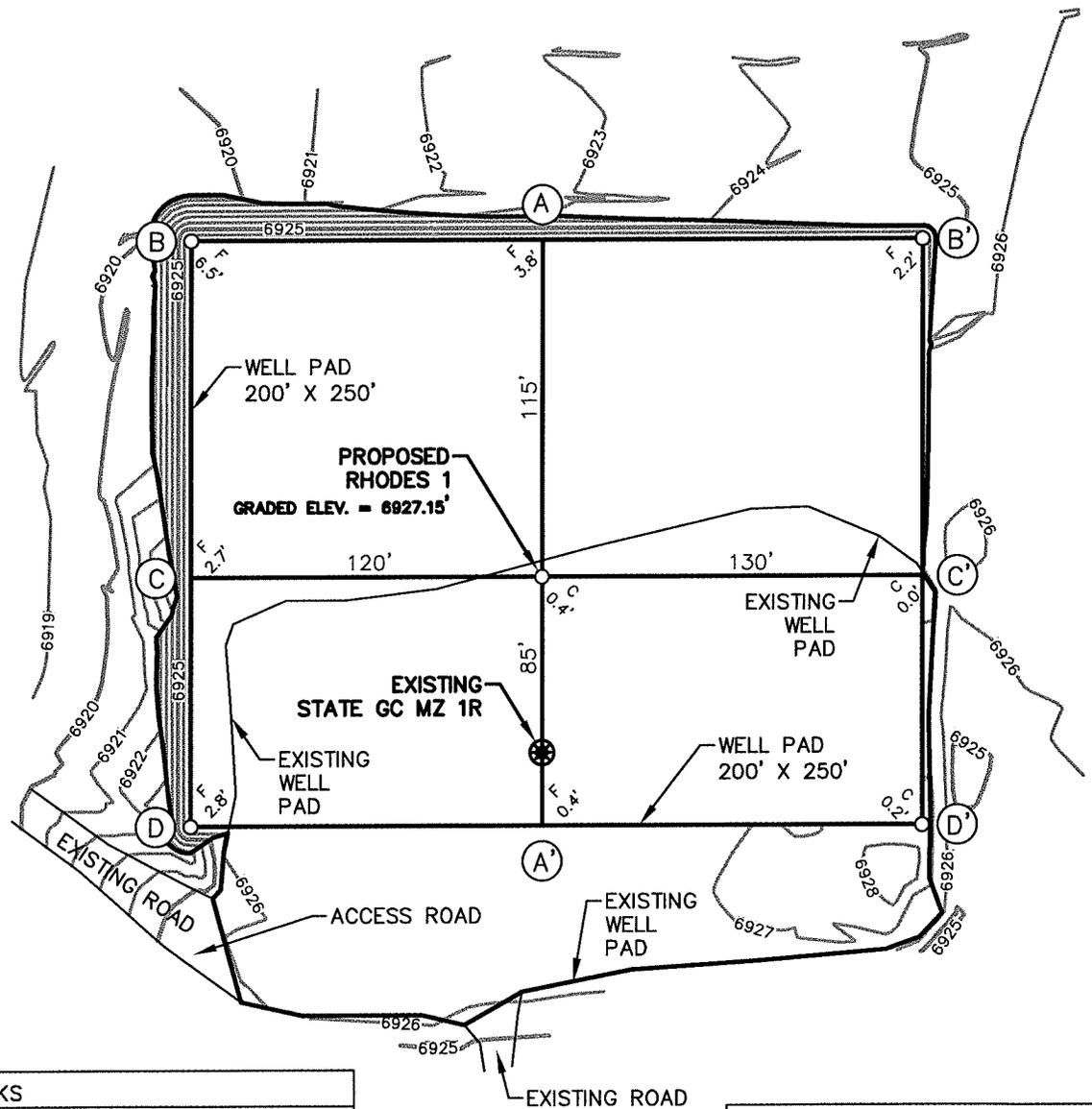
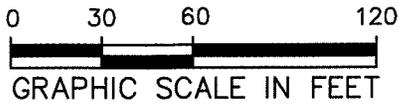
1. Notification regarding equipment changes – email is sufficient. Staff will attach the information to the project file. If the equipment changes increase land use impacts, a permit modification will be required (LPC Code 90-44(b)).
2. Annual updates to Emergency Preparedness Plan (LPC Code 90-51).
3. If required by the County, provide a copy of written notification provided to surface owners regarding commencement of construction and drilling operations (LPC Code 90-77).
4. Applicant must send an AutoCad or equivalent GIS digital file of the Proposed Intermediate line to the Office of Emergency Management at pipeline@co.laplata.co.us . It is not necessary to include files of features other than existing and proposed pipelines.

Rhodes 1:

All of the disturbed areas not used for routine operations will be reclaimed. This will include re-contouring slopes to 3:1 or greater and seeding/mulching. The seed will be drilled or broadcasted where machinery cannot access. Straw mulch will be spread and crimped over the seeded areas to retain moisture and limit erosion. The Natural Resources Conservation Service's (NRCS) seed mix will be utilized.

A Construction Stormwater Permit has been obtained from the CDPHE and a site specific plan has been developed. Best Management Practices (BMPs) will be installed and monitored per the plan and permit requirements. Weeds will be inspected and treated annually, when necessary, by a certified weed control contractor. A Weed Control Plan has been approved and filed by the county.

Please see associated Stormwater Reclamation maps for drainages and BMPs.



EARTHWORKS
CUT: 11 CUBIC YARDS
FILL: 4,221 CUBIC YARDS
TOPSOIL: 616 CUBIC YARDS
NET IMPORT: 4,826 CUBIC YARDS

EXISTING PAD SIZE: 0.802 ACRES
PROPOSED EXPANSION SIZE: 0.763 ACRES
LEVEL PAD SIZE: 1.149 ACRES
TOTAL DISTURBED AREA: 1.565 ACRES

SURVEY NOTES

1. BEARING BASIS FOR THIS SURVEY IS BASED ON THE NORTH AMERICAN DATUM OF 1983, COLORADO STATE PLANE COORDINATE SYSTEM, SOUTH COLORADO, ZONE 0503.
2. ELEVATION BASIS FOR THIS SURVEY IS BASED ON THE NORTH AMERICAN VERTICAL DATUM OF 1988 (GEOID12A).
3. CONSTRUCTION SHALL ADHERE TO ALL LOCAL, STATE, AND FEDERAL REGULATIONS.
4. DETAILED CONSTRUCTION SPECIFICATIONS PROVIDED IN SCOPE OF WORK.
5. ACTUAL SLOPE AND DIRECTION OF DRAINAGE WILL BE FIELD FIT.

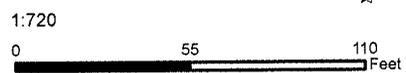
DRAWN BY CFW	CHECKED BY RLM	SCALE 1"=60'	DATE 05/20/2015	SHEET 1 OF 2	REVISION 0
-----------------	-------------------	-----------------	--------------------	-----------------	---------------

	BP AMERICA PRODUCTION COMPANY US LOWER 48 ONSHORE
	CONSTRUCTION LAYOUT PLAT
RHODES 1 PART OF SECTION 07, TOWNSHIP 34N, RANGE 06W, N.M.P.M. LA PLATA COUNTY, COLORADO	



- Proposed Well
- ➔ Flow Direction
- Sediment Control Log
- ⊗ Permanent Seeding & Mulching
- ⋯ Rock Rundown

LAND TYPE: FEE
 LAT: 37.20805095 N
 LONG: 107.54590750 W
 NW¼ SEC 7U, T34N R 06W

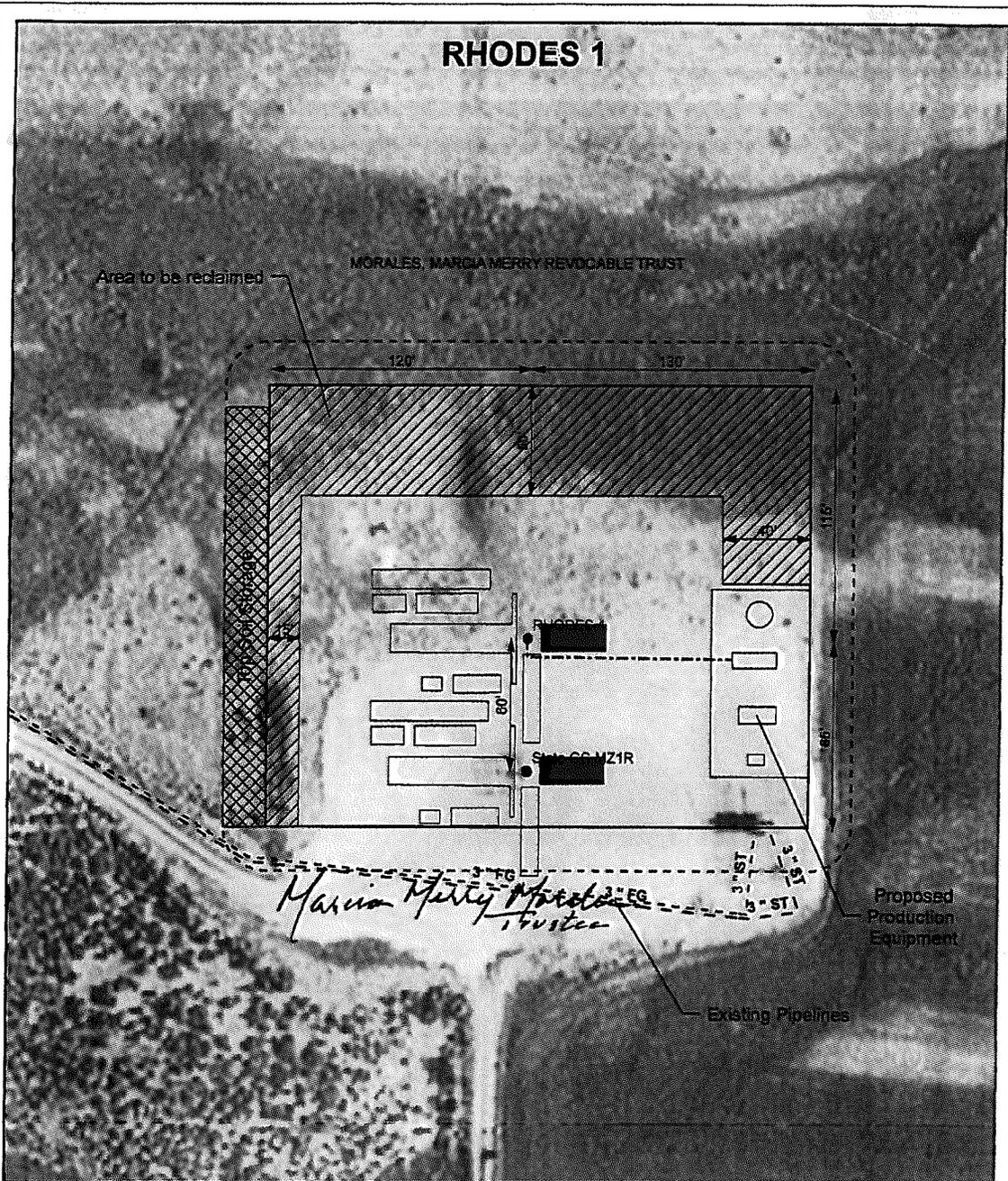


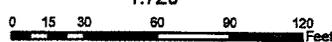
DISCLAIMER: This general arrangement drawing (GAD) has been generated for a preliminary discussion of a proposed access road, pipeline, ditch or other type of facility. The location and arrangement thereof are approximate and subject to change at any time, whether due to on-the-ground surveys, regulatory requirements or (without limitation) other factors. Reclamation plans do not reflect cut and fill slopes and are subject to change as data is acquired. This GAD is confidential and its duplication or distribution requires written permission from BP America Production Company.

BP America
 San Juan North
 Durango, CO

RHODES 1				
Reclamation/Supplemental Stormwater Plan				
6/1/2015	SCALE AS NOTED	PROJ #		La Plata County, Colorado
DB	ENGINEER	FILE	REV 0	

RHODES 1



● Proposed Well	- - - TUA			
- - - Flow_lines	□ Work Over Rig			
□ Pad	■ Artificial Lift	3/4/15	N	1:720
▨ Reclaim	▩ Top Soil Storage			

SE¼NW¼ Sec 7U T34N R06W

DISCLAIMER: This general arrangement drawing (GAD) has been generated for a preliminary discussion of a proposed access road, pipeline, drillsite or other type of facility. The location and arrangement thereof are approximate and subject to change at any time, whether due to on-the-ground surveys, regulatory requirements or (without limitation) other factors. Reclamation plans do not reflect cut and fill slopes and are subject to change as data is acquired. This GAD is confidential and its duplication or distribution requires written permission from BP America Production Company.

Rhodes 1 Well Pad Photos

Photo Looking North (05/19/2015)



Photo Looking East (05/19/2015)



Photo Looking South (05/19/2015)



Photo Looking West (05/19/2015)

