

MRG, LP  
CE Pad  
SENE Section 11, T5N R68W  
City of Loveland  
Larimer County, Colorado

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## EMERGENCY RESPONSE PLAN

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MRG, LP (MRG), proposes to operate one new location within the boundaries of the City of Loveland in Larimer County, Colorado. The location, the CE Pad, is a new proposed well pad with up to 15 new wells. The location is proposed to tie in to gathering infrastructure that will transport crude oil, natural gas, and produced water from location to minimize heavy truck traffic in the area.

This plan has been drafted to comply with COGCC Rules 304.c.(8) and Rule 602.j.

### **1. Local Responder Coordinating Agency and Contact Information**

This location is located in the limits of the City of Loveland, in Larimer County, Colorado, in the Loveland Fire Rescue Authority District.

The plan underwent initial review and received comments from the City of Loveland (CoL) on July 6, 2022. The comments were incorporated into this plan. CoL has deferred a second review of the Emergency Response Plan until MRG submits its formal local government application to CoL, which will occur when MRG has received its completeness determination from COGCC. CoL has requested to conduct its local permit process concurrently with COGCC's technical review. If any changes are made to the Emergency Response Plan during CoL's formal review, the updated, finalized document will be submitted to COGCC.

City of Loveland Emergency Manager  
100% Full-time

Contact: Robert Carmosino  
(970) 962-2534  
500 E. Third St.  
Loveland, CO 80537

Loveland Fire Rescue Authority  
Full-Time and Volunteer

Contact: (970) 962-2471  
410 E. 5<sup>th</sup> St.

Loveland, CO 80537

UC Health Medical Center of the Rockies

100% Full-time

Contact: (970) 624-2500  
2500 Rocky Mountain Ave.  
Loveland, CO 80538

## 2. Operator Emergency Contact Number

Contact: Andy Peterson  
MRG, LP  
2725 Rocky Mountain Ave.  
Loveland, CO 80538  
(970) 669-7411

## 3. Local Responder Mutual Aid Agencies

Loveland Rural Fire Protection District	Part Volunteer
Greeley Fire Department	100% Paid
Front Range Fire Rescue	Part Volunteer

## 4. Other Reporting Agencies

Colorado State Highway Patrol	(970) 224-3027
Larimer County Sheriff	(970) 498-5100
COGCC	(303) 894-2100
CDPHE - WQCD	(303) 692-3500
CDPHE – APCD	(303) 692-3100
National Response Center	(800) 424-8802

## 5. Coordination with First Responder Agencies

If an emergency occurs on location, MRG's onsite representative will contact first responder agencies. They will establish if they will meet them at the muster point or on location. The onsite company representative will contact MRG office staff to alert them to the emergency.

## 6. Potential Impacts to the Environment and Nearby Population

This location is located approximately 700 feet from the nearest building. In the event of an emergency, there should be no imminent impacts to nearby populations. There are no immediate potential environmental impacts to waterways or water bodies.

Any COGCC-defined reportable spill outside of the secondary containment that has the potential to leave the facility or to threaten Waters of the State shall be immediately reported to the Loveland Fire Rescue Authority Emergency Dispatch (911) and to the Director promptly thereafter.

## **7. Health and Safety Action Levels**

### **a. Hydrogen Sulfide (H<sub>2</sub>S)**

- i. This location is not anticipated to encounter any H<sub>2</sub>S during drilling nor have any produced from the proposed wells.

### **b. Decontamination**

- i. MRG will have eyewash stations and freshwater available onsite if there are chemicals in use on location that could be hazardous on skin contact.

### **c. Spill Response and Clean Up**

- i. All activities will comply with federal and state spill response/reporting requirements and be operated in a manner that prevents spills and releases of crude oil, natural gas, produced water and other wastes to the environment.
- ii. All tank batteries will comply with COGCC Rule 603.o secondary containment requirements.
- iii. During the drilling, completions, initial production, and flowback phases the operator will have personnel onsite 24 hours a day, 7 days a week. During this time the wells achieve maximum flow rates and will be monitored with personnel onsite around the clock to insure no spills occur. Onsite personnel will have the ability to shut the wells in if needed.
- iv. COGCC Rule 912.b establishes spill reporting thresholds to be:
  1. Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly maintained road;
  2. A Spill or Release in which 1 Barrel or more of E&P Waste or produced Fluids is spilled or released outside of berms or other secondary containment;
  3. A Spill or Release of 5 Barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is

completely contained within berms or other secondary containment.

- v. If a spill or release were to occur, field personnel are instructed to:
  - 1. Assess immediate danger or threat to health, safety, and welfare and contact emergency responders, if appropriate;
  - 2. Locate and stop the source of the spill, if safe to do so;
  - 3. Report the spill to the Operations Manager and arrange for additional response support, including contractor support;
  - 4. Take whatever steps are necessary to prevent the spill from impacting surface water, public health, safety, and welfare; and,
  - 5. Report the spill to MRG management, who will coordinate follow-up spill cleanup and environmental assessment activities and who will report the incident to appropriate authorities.

#### **d. Evacuation Procedures**

- i. During drilling, completion, and flowback operations, MRG's onsite representative will have a list of vendors and contract companies onsite. Each contractor company's supervisor will have a list of their company personnel onsite. All contractors working onsite will be informed of the muster point should an evacuation be necessary. In addition, a gate guard and security post will be in place at the entrance to location during drilling, completion and flowback operations. The gate guard will keep a list of all personnel on location.
- ii. Should an emergency occur that warrants evacuation, all contractors onsite will be instructed to evacuate location. They will meet at the muster point where the company representative will verify everyone has been evacuated.
- iii. From the muster point, the company representative will contact first responders, reporting agencies, and MRG staff as necessary.

#### **e. Staging Areas**

- i. Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road 3.

#### **f. Financial Reimbursement**

- i. The operator will reimburse the appropriate emergency response service providers for costs incurred in connection with any emergency caused by oil and gas operations and not promptly handled by the operator or its agents.
- ii. The operator shall reimburse the Loveland Fire Rescue Authority (Authority) for any emergency response costs incurred by the Authority in connection with fire, explosion, or hazardous materials at the well or production site, except that the operator shall not be required to pay for emergency response costs where the response was precipitated by mistake of the Authority or in response to solely a medical emergency.

## **8. Operator Solvency**

MRG employs or has contracted with personnel that have years of operational experience in the oil and gas field, as well as Colorado-based experience.

During drilling operations, MRG will contract with a third-party drilling contractor that specializes in drilling oil and gas wells. The drilling contractor will conduct safety meetings prior to each shift beginning operations.

MRG will provide financial assurance as is currently required under COGCC's 700 Series Rules that will cover this location.

## 9. Site Specific Information

Location Information	
Location Name	CE Pad
COGCC Location ID	Pending
Location Legal Description	SENE Section 11, T5N R68W
Location Latitude and Longitude	40.415402 -104.965957
Directions to location from Loveland, Colorado	From the intersection of I-25 and Highway 34: Head east on Highway 34 for approximately 1.5 miles to County Road 3. Head north on County Road 3 for approximately 0.5 miles until you reach the access road for the CE well pad. Turn west on the access road to reach the location.
Description of Site Setting	The site is located in non-irrigated cropland. There are no immediate potential impacts to waterways or water bodies. The Loveland and Greeley Canal is approximately 1,811' away, downgradient of this location.
Description of Location Equipment, Fluids, and Potential Hazards	This location will contain wellheads, separators, and tanks to store produced water and crude oil.  Potential Hazards would be leaks from the on-location wellhead flowlines, tanks, or separators.
Description of Mitigation Measures for Potential Impacts to the Environment and Nearby Population	The on-location flowline undergoes Audio-Visual-Olfactory inspections monthly and triennial pressure testing to ensure integrity of the lines.
Response Equipment Staged on Location	None
Safety Action Levels, Decontamination, and Staging Areas	Should an emergency occur that warrants leaving the location, staging areas and muster points will occur at the intersection of the access road and County Road 3.

**Attachments:**

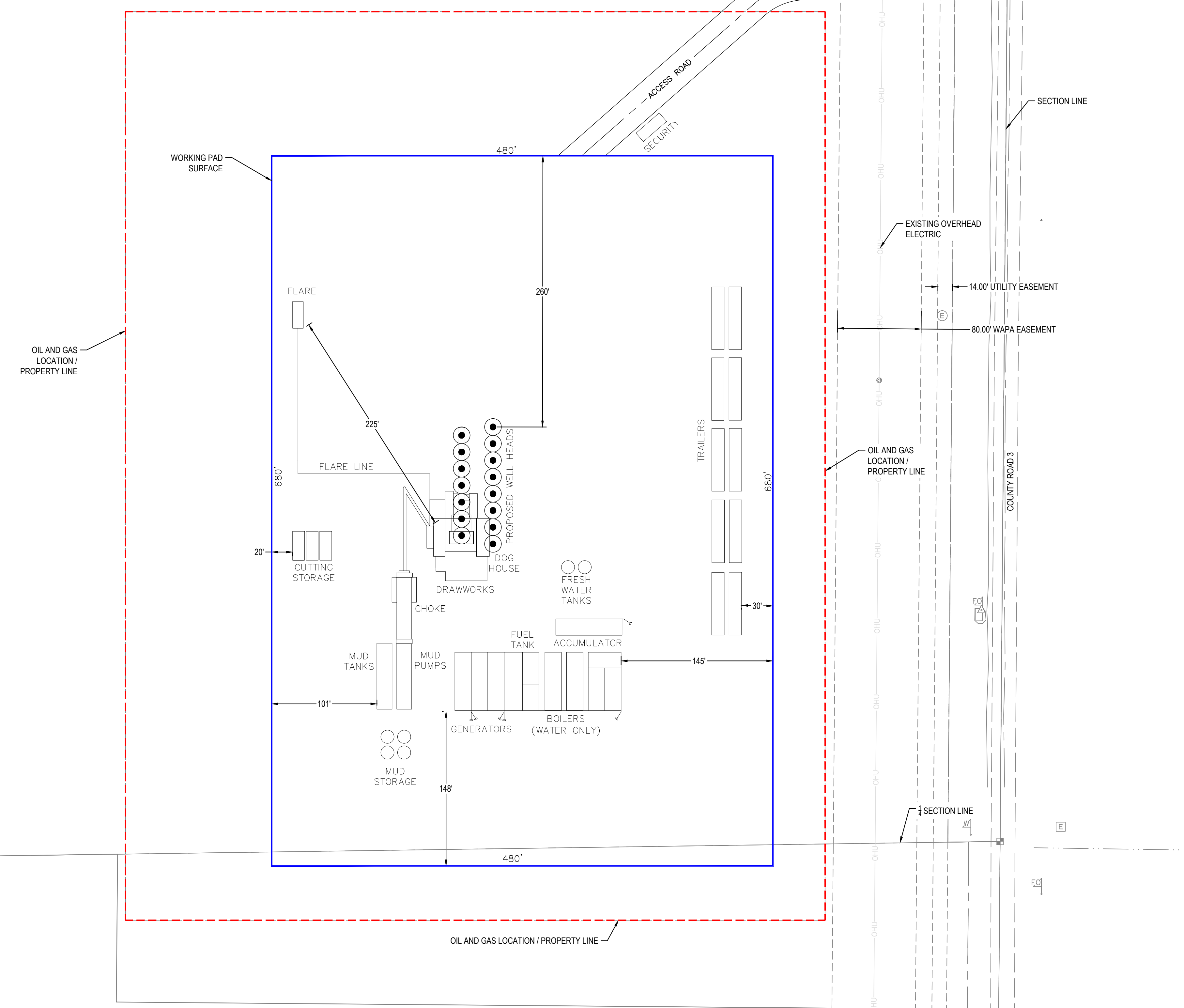
Oil and Gas Location Layout Drawings

Emergency Route Maps

Access Road Maps

City of Loveland Emergency Manager Concurrence with Plan

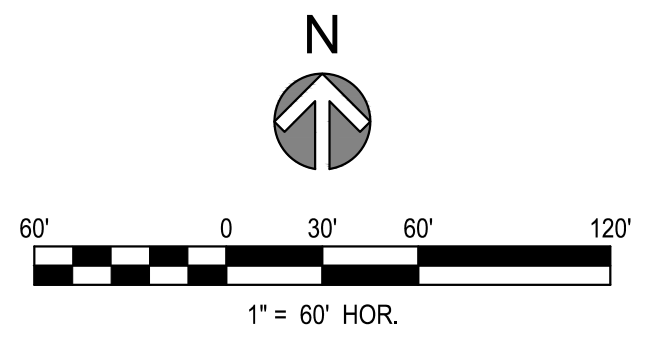
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**LEGEND**

WORKING PAD SURFACE

OIL AND GAS LOCATION



REV	REVISION DESCRIPTION	DATE	CHND	CHKD	APPR
A	COGCC SUBMITTAL PACKAGE	06/22/2022	TVG	TS	SWC

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ACCEPTED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

CITY ENGINEER (or Designee)

Engineering | Architecture | Design-Build | Surveying | Planning | Geospatial Solutions

5970 GREENWOOD PLAZA BLVD. GREENWOOD VILLAGE, CO. 80111  
 303-751-0741  
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PE STAMP

TITLE

**MRG OIL AND GAS**  
 CITY OF LOVELAND, COLORADO  
 CE PAD COGCC PLANS  
 PRELIMINARY RIG LAYOUT

JOB NUMBER  
65120236-10

DATE  
6/22/2022

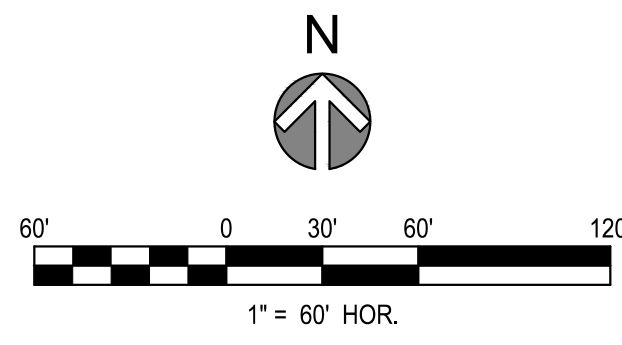
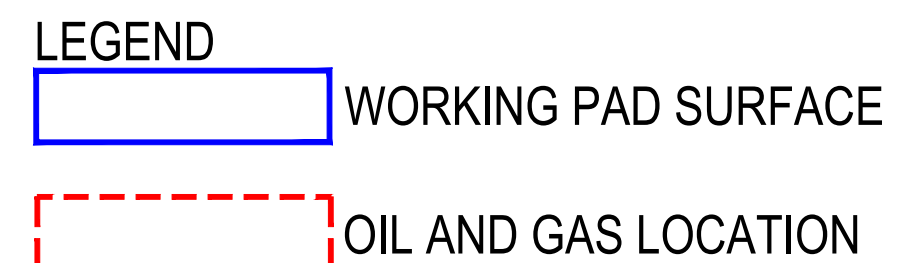
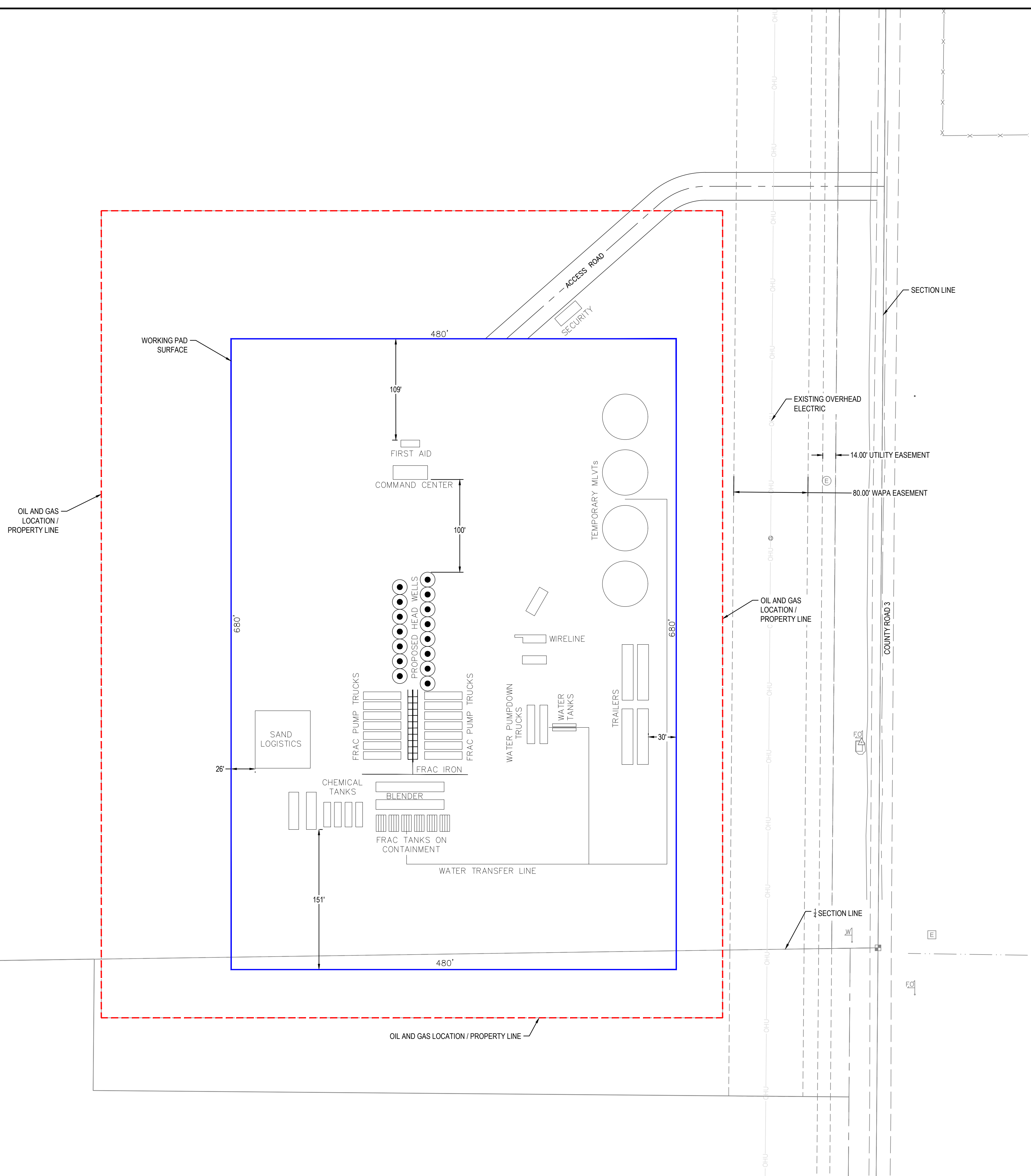
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File Location: Q:\DEN\Projects\178-00\_CMD\_Central\Projects\0226-08 MRG\_Misc\_Oil\_and\_Gas\Design\CD\COGCC\022608- WELL COMPLETION AND SIMULATION.dwg Plot Date: 6/22/2022 10:21 AM Last Saved By: TSCARLETT



REV	REVISION DESCRIPTION	DATE	CHND	CHKD	APPR
A	COGCC SUBMITTAL PACKAGE	06/22/2022	TVG	TS	SWC

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CITY ENGINEER (or Designee)



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**MRG OIL AND GAS**  
 CITY OF LOVELAND, COLORADO  
 CE PAD COGCC PLANS  
 PRELIMINARY WELL COMPLETIONS AND STIMULATION LAYOUT

JOB NUMBER: 65120236-10

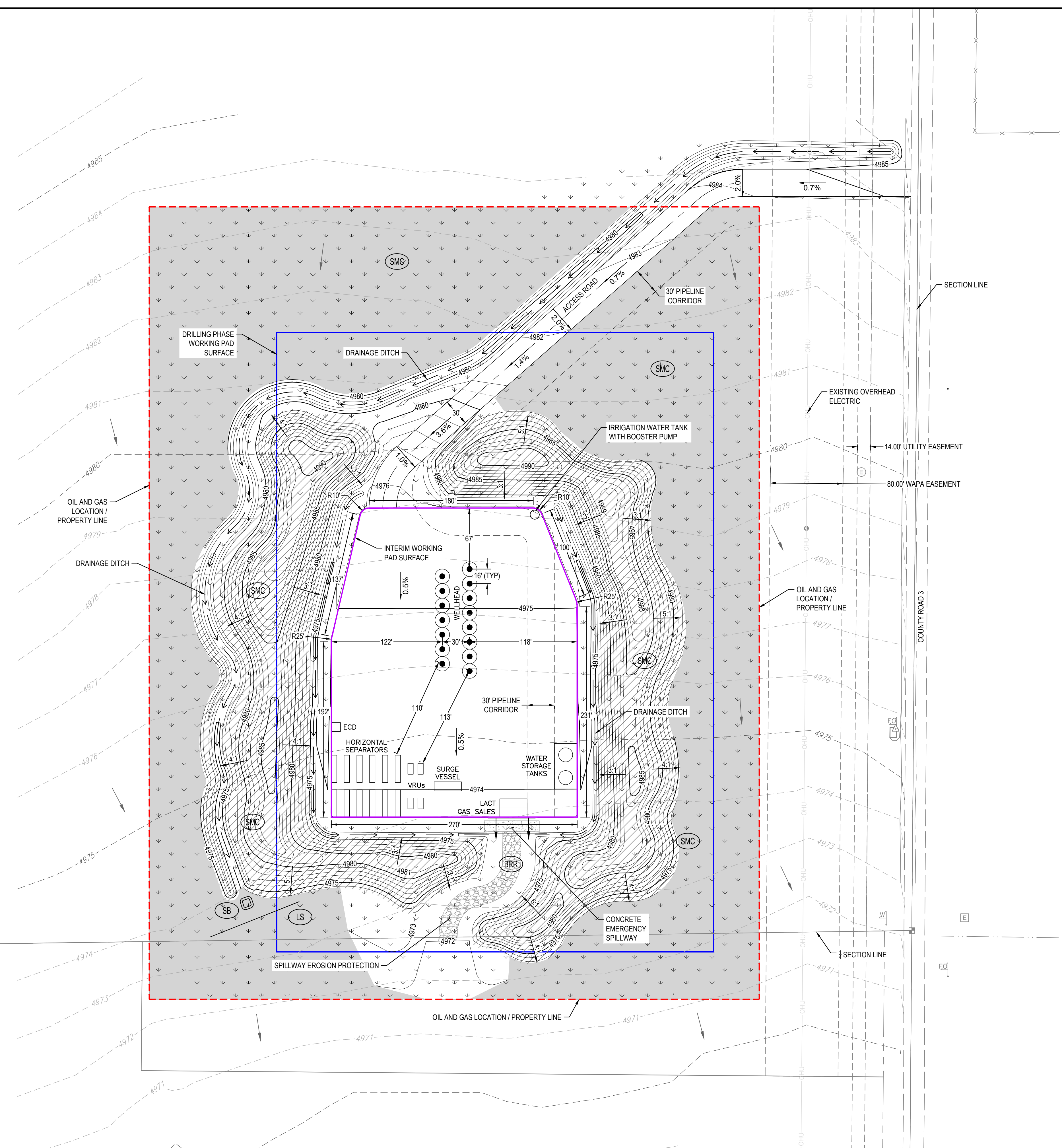
DATE: 6/22/2022

SHEET: **C-300**

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OIL AND GAS LOCATION: ±13.4 ACRES  
 INTERIM WORKING PAD SURFACE: ±2.0 ACRES  
 RECLAIMED AREA: ±6.2 ACRES  
 UNRECLAIMED AREA: ±5.2 ACRES

EARTHWORK VOLUMES  
 ALL REPORTED VOLUMES ARE BANK VOLUMES  
 TOTAL CUT: 40,438 CY  
 TOTAL FILL: 49,388 CY

- LEGEND**
- WORKING PAD SURFACE
  - OIL AND GAS LOCATION
  - INTERIM WORKING PAD SURFACE
  - FILL
  - RECLAIMED AREA
  - DITCH FLOW LINE
  - SB STILLING BASIN
  - LS LEVEL SPREADER
  - BRR BURIED SOIL RIPRAP
  - SMC SEEDING, MULCHING AND CRIMPING

REV	REVISION DESCRIPTION	DATE	CHND	CHKD	APPR
A	COGCC SUBMITTAL PACKAGE	06/22/2022	TVG	TS	SWC

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DATE: \_\_\_\_\_

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MRG OIL AND GAS  
 CITY OF LOVELAND, COLORADO  
 CE PAD COGCC PLANS  
 INTERIM RECLAMATION/FACILITY LAYOUT DRAWING

JOB NUMBER	65120236-10
DATE	6/22/2022
SHEET	C-500
	6 of 06

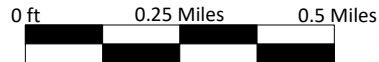


CE Pad  
 MRG, LP  
 SENE Section 11, T5N R68W  
 Emergency Route Map

**Legend**

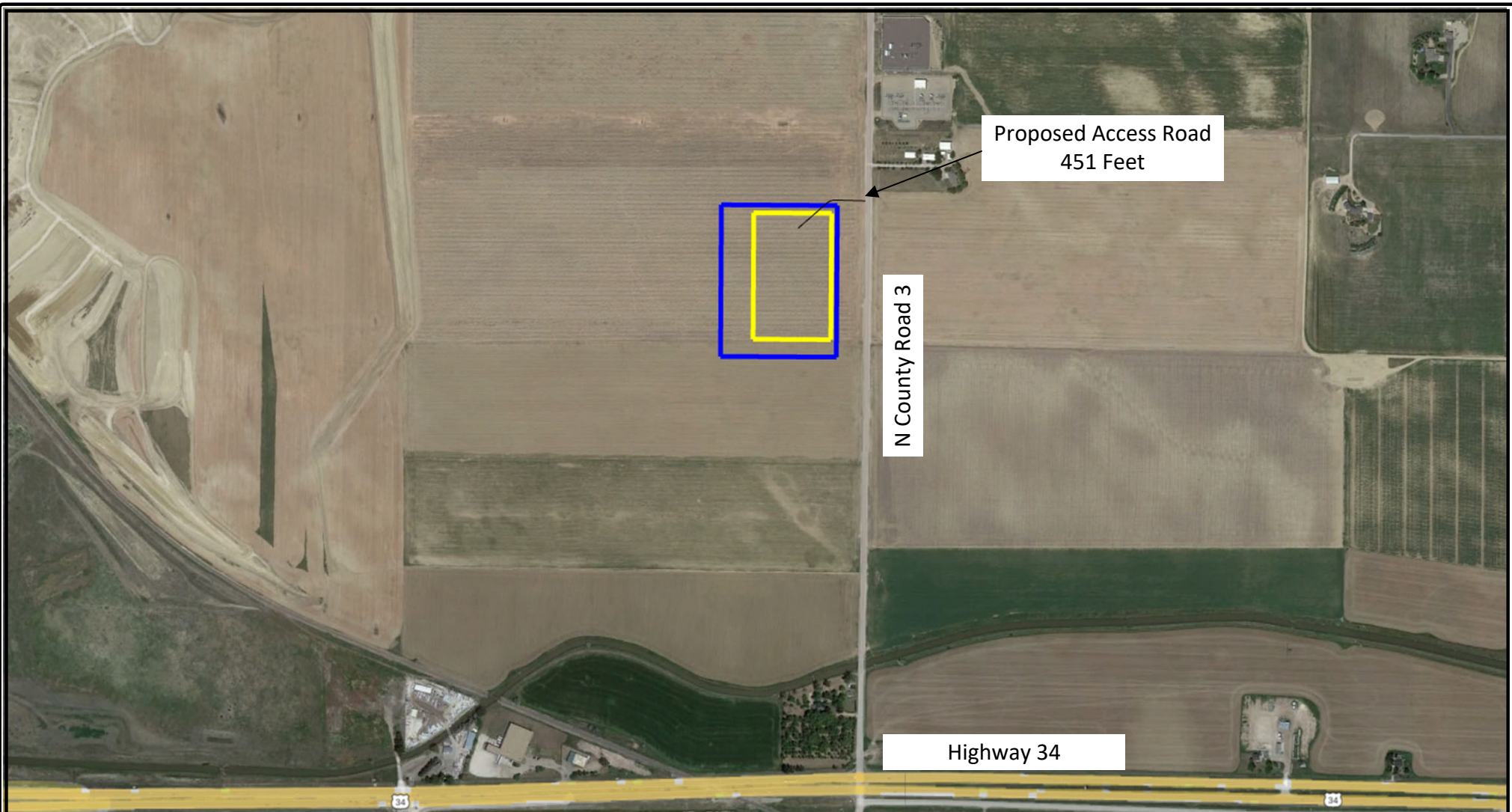


Emergency Route



Prepared By:  
 Ardor Environmental LLC

June 7, 2022



CE Pad  
MRG, LP  
SENE Section 11, T5N R68W  
Access Road Map

**Legend**

 Proposed Access Road

 Working Pad Surface  Oil and Gas Location



Prepared By:  
Ardor Environmental LLC

July 20, 2022



Jessica Donahue <jdonahue@ardorenvironmental.com>

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## RE: [External] Fwd: MRG - CE Well Pad Emergency Response Plan

1 message

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**Ingrid McMillan-Ernst** <Ingrid.McMillan-Ernst@lfra.org>  
To: Jessica Donahue <jdonahue@ardorenvironmental.com>

Wed, Aug 3, 2022 at 3:22 PM

Hello, Jessica. I apologize that I have been so unavailable. I am covering two other staff member's since they are out, and also been in nonstop meetings.

I am not having time to do any side reviews/ offline reviews of items. If you feel good about the Plan, please just submit it with your main submittal. If I find anything in the formal review, I will write out as technical corrections.

Thankyou and thanks for your diligence.

### **Ingrid McMillan-Ernst**

#### ***Plan Reviewer***

Loveland Fire Rescue Authority



970-962-2554 - office

970-685-1459 - cell

[www.cityofloveland.org](http://www.cityofloveland.org)

<https://twitter.com/LovelandFRA>

**From:** Jessica Donahue <jdonahue@ardorenvironmental.com>  
**Sent:** Tuesday, August 2, 2022 5:19 PM  
**To:** Ingrid McMillan-Ernst <Ingrid.McMillan-Ernst@lfra.org>  
**Subject:** Re: [External] Fwd: MRG - CE Well Pad Emergency Response Plan

Hi Ingrid,

Do you have time tomorrow (Wednesday) to discuss the plan? We should be submitting to COGCC this week.

Thanks,

Jessica

On Thu, Jul 28, 2022 at 2:54 PM Ingrid McMillan-Ernst <[Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)> wrote:

Thanks for checking in, Jessica. I won't be able to look at this until tomorrow or Monday. I will get back to you as soon as I have had time.  
Have a good end of week.

## Ingrid McMillan-Ernst

### *Plan Reviewer*

Loveland Fire Rescue Authority



970-962-2554 - office

970-685-1459 - cell

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**From:** Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

**Sent:** Thursday, July 28, 2022 9:53 AM

**To:** Ingrid McMillan-Ernst <[Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)>

**Subject:** [External] Fwd: MRG - CE Well Pad Emergency Response Plan

Good morning Ingrid,

I just wanted to follow up with you again and see if you had had a chance to review the Emergency Response Plan. We are hoping to submit to COGCC by next Tuesday but I will need your concurrence that it is complete before I can submit.

Let me know if you have any corrections.

Thank you,

Jessica

----- Forwarded message -----

From: Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

Date: Wed, Jul 20, 2022 at 4:04 PM

Subject: Re: MRG - CE Well Pad Emergency Response Plan

To: Ingrid McMillan-Ernst <[Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)>

Cc: Troy Bliss <[Troy.Bliss@cityofloveland.org](mailto:Troy.Bliss@cityofloveland.org)>, David Rhoades <[David.Rhoades@lfra.org](mailto:David.Rhoades@lfra.org)>, Carie Dann <[Carie.Dann@lfra.org](mailto:Carie.Dann@lfra.org)>, Tim Sendelbach <[Tim.Sendelbach@lfra.org](mailto:Tim.Sendelbach@lfra.org)>, Robert Carmosino <[Robert.Carmosino@lfra.org](mailto:Robert.Carmosino@lfra.org)>

Hi Ingrid,

I believe I have incorporated all of your recommendations. Please let me know what you think of the attached draft.

Jessica

On Wed, Jul 6, 2022 at 8:10 AM Ingrid McMillan-Ernst <[Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)> wrote:

Hello, Jessica.

Thank you for your Emergency Response Plan draft. I wanted to get back to you prior to tomorrow's meeting. I am copying some pertinent fire personnel so that they stay informed.

This document is one piece of what will be submitted for review, correct? We will also require a written narrative which will address in detail the access roads, fencing, items pertaining to Municipal Code requirements, Control of Fire Hazards, Noise Mitigation study, new and existing pipelines, etc., location of SDS sheets, sign-in sheets, etc.

As far as this Emergency Response document, I do have some requests.

Our Emergency Manager is Robert Carmosino (copied on this message), and not Pat Mialy.

Please add the Colorado State Highway patrol, the Larimer County Sherriff's office, and other pertinent regulatory agencies (COGCC, CDPHE, National Response Center, etc).

Please add the names and numbers of the Spill Response organization(s).

Please add a Spill Response and Clean Up narrative (Response, Reporting, etc.)

Please add a narrative of Evacuation Information with Evacuation Plan Procedures

Please add a narrative identifying the steps for coordination with first responder agencies.



We will discuss internally the section about "Response Equipment Staged on Location", and get back to you. I will also double check the LFRA phone numbers listed in your doc, to ensure they are the correct ones.

There was only one Map attachment. Please provide the others.

I hope this helps. We can discuss any/ all of this in tomorrow's meeting, or we can discuss offline separately as needed.

Sincerely,

**Ingrid McMillan-Ernst**

***Plan Reviewer***

Loveland Fire Rescue Authority



970-962-2554 - office

970-685-1459 - cell

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<https://twitter.com/LovelandFRA>

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**From:** Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>  
**Sent:** Tuesday, June 28, 2022 12:12 PM  
**To:** Ingrid McMillan-Ernst <[Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)>  
**Subject:** [External] FW: MRG - CE Well Pad Emergency Response Plan

Hi Ingrid,

I just wanted to follow up with you and see if you had any questions regarding the emergency response plan I had sent over last week.

Jessica

Jessica Donahue

Compliance Specialist

(303) 888-4862

<https://www.ardorenvironmental.com/>



---

**From:** [Jessica Donahue](#)

**Sent:** Monday, June 20, 2022 5:14 PM

**To:** [Ingrid.McMillan-Ernst@lfra.org](mailto:Ingrid.McMillan-Ernst@lfra.org)

**Subject:** MRG - CE Well Pad Emergency Response Plan

Hi Ingrid,

I wanted to send you a draft of the emergency response plan required by COGCC and see if you had any comments/corrections/suggestions. Let me know if there is additional information Loveland would like to see included.

The site location and access road maps are still being finalized (not included in the PDF) but I wanted to get a start on the verbiage portion of the document.

I look forward to hearing from you.

Thanks,

Jessica

Jessica Donahue

Compliance Specialist

(303) 888-4862

<https://www.ardorenvironmental.com/>

