MRG, LP CE PAD EMERGENCY ACTION PLAN SENE SECTION 11, T5N R68W CITY OF LOVELAND LOVELAND FIRE RESCUE AUTHORITY

Prepared on: February 15, 2023

Emergency Action Plan Checklist

The EAP is designed to assist local agencies with critical information that may aid first responders and company personnel during an emergency. Local agencies may include but are not limited to, fire department(s), emergency medical service(s) (EMS), law enforcement agencies (LE), and City or County Office of Emergency Management (OEM). State and Federal agencies consisting of Colorado Department of Public Health and Environment (CDPHE), and the Environmental Protection Agency (EPA), may also reference the EAP.

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			Yes	No	Pg. #
1					π
1.	a.	Approval Signatures			
2.		PLAN IDENTIFIES THE FACILITY(S)			
	a.	The plan includes the Facility Name*			
	b.	The plan includes ingress and egress information			
	с.	The plan includes the Facility Street Address/Physical			
		Address and GPS Coordinates			
	d.	The plan includes the Latitude/Longitude for the facility(s)*			
	e.	The plan lists Emergency Muster/Assembly point(s)			
	f.	Location of personal/visitor log sign-in sheets, JSA, safety			
		forms			
3.	THE P	PLAN IDENTIFIES THE LIST OF COMPANY AND CONTRAC	CTOR EME	RGENCY	
	CONT	ACTS			
	a.	Company Contact Information			
		i.) Corporate Contact and Address (may be in-or-			
		out of state)			
		ii.) Field Office and Address			
		iii.) On-Call 24/7 Company Emergency Number			
		iv.) EHS Supervisor/Manager			
		v.) EHS Safety Representative/Advisor			
		vi.) EHS Environmental Representative/Advisor			
	b.	Company Community/Media Relations Contact			
		Information			
	c.	First Responder Contact Information			
		i.) Fire Department serving this jurisdiction (<i>may</i>			
		require 1-2 Fire Station contacts)			
		ii.) County Sheriff			
		iii.) Colorado Highway State Patrol (<i>responsible for</i> <i>roadway Spill/Hazmat</i>)			
		iv.) Local Police Department			
		v.) Local EMS			
	d.	Local, State, and Federal Contacts			
	u.	i.) Colorado Oil and Gas Conservation			
		Commission (COGCC)			
		ii.) Colorado Department of Public Health &			
		Environment (CDPHE)			
		iii.) Colorado Parks and Wildlife (CPW)			
		iv.) National Response Center (NRC)			
	е.	Nearest Medical Facilities/Hospital			
	f.	Spill Response Organization Contact Information			
		i. Contracted Spill Response Company(s) (HAZMAT			
		Spill Response)			

			Yes	No	Pg. #
	h.	Railroad Emergency Response (If applicable)			π
	11.	i.) Union Pacific			
		ii.) BNSF			
		iii.) Great Western Railway/Omni Trax			
4.	THE P	LAN IDENTIFIES SITE SPECIFIC INFORMATION			
	a.	Site Description			
		i. Number of heavy equipment onsite and lists of			
		hazardous materials stored on-site			
	b.	The plan identifies nearby Schools and other High-			
		Occupancy Buildings/Dwellings			
	с.	The plan lists Site Safety Requirements;			
		i.) Minimum PPE to enter facility			
		ii.) EHS Statement for contract personnel; understand and abide by Company EHS policies			
		and procedures			
		iii.) Primary Hazards of the Facility location			
	d.	Location of SDS Sheets			
5.		LAN IDENTIFIES MAPS AND DRAWINGS			
	a.	Site Map			
		i.) Project Area Maps			
		ii.) Project Access Map and Muster Point(s)			
		iii.) Truck Haul/HazMat delivery Route Map			
		iv.) 2500' (800 meter) Buffer Zone (ERG			
		Evacuation Radius)			
6.	THE P	LAN LISTS SPILL RESPONSE CLEAN UP AND REPORTING	CRITERI	4	
	a.	Spill Response process statement for how the company			
		manages a release/spill			
	b.	Spill Reporting process for notifying CDPHE, and local			
		authorities (<i>if applicable</i>)			
		i.) Include reporting thresholdsii.) Reporting timeframe/deadline for initial			
		ii.) Reporting timeframe/deadline for initial notification			
		iii.) Company commitment statement for Spill			
		Reporting			
6.	THE P	LAN LISTS REPORTABLE STORAGE QUANTITY'S ON SIT	E		
	a.	Quantity(s) of chemicals stored on site.			
	b.	Tier II Reporting Requirements; Notes if the facility meets			
		threshold requirements, and date submitted to the State of			
		Colorado each Year (March 1 st)			
7.	EVAC	UATION INFORMATION			
	a.	Evacuation plan procedures (public)			
		i.) Process for how emergency evacuation,			
		notifications and coordination with local			
		authorities			

Emergency Action Plan Checklist

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			Yes	No	Pg.
					#
8.	EVAC	UATION INFORMATION			
	a.	Evacuation Plan procedures (public)			
9.	TRAIN	NING AND EXERCISES			
	a.	Statement with commitment the company will schedule			
		training and exercises with LFRA.			
10.	COOR	NOTION WITH FIRST RESPONDER AGENCIES			
	a.	Statement with commitment the company will coordinate			
		with LFRA during an incident			
11.	Plan Re	eview and update procedure			
	a.	Statement on how the company will coordinate with LFRA			
		on updating the EAP			
	b.	Operator has coordinated with LFRA on applicable			
		jurisdictional fire codes			

SITE SAFETY AND EMERGENCY ACTION PLAN



McWHINNEY

MRG, LP 2725 Rocky Mountain Ave, Suite 200, Loveland, CO 80538

Facility Name:

CE Pad

Facility Street Address: TBD

LOVELAND, COLORADO

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SECTION 1 – APPROVAL SIGNATURES

Instructions: Company Representative to sign with concurrence review by local Fire Department/Districts

	MRG, LP		
Name	Signature	Title	Date
	LFRA		
Name	Signature	Title	Date

SECTION 2 – SITE ADDRESS AND DIRECTIONS

a) Directions:

From the intersection of U.S. Highway 34 and Larimer County Road 3, go north on CR 3 for 1/2 mile. Turn left, go 1/10 mile west into facility.

From the intersection of Crossroads Boulevard and Larimer County Road 3, go south on CR 3 for 1/2 mile, turn right, go 1/10 mile west into facility.

b) Ingress and egress information:

During the drilling and completion phases, all traffic into and out of the facility will check-in and check-out with security, who will be located in a trailer at the northern access to the site. All ingress and egress routes will be clearly identified and kept clear from parked/staged vehicles at all times.

During the production phase, the facility will be chain-link fenced and access will be via a locked security gate with Knox Box access.

c) Physical Address and GPS coordinates

- Legal Description SENE Section 11, T5N, R68W
- Street Address tbd
- Town, Zip Loveland, CO 80538
- Lat/Long: 40.41555°N Long: -104.96605°W

d) Emergency Evacuation/Muster Assembly point

Incidents at the facility could pose a hazard to personnel onsite, such as a fire or hazardous material release, and evacuation may be required to ensure the safety of onsite personnel. In the event of an emergency, site personnel will initially be evacuated to a pre-designated muster assembly point.

- The Muster Assembly point is identified on the figures in Section 5 of this plan.
- The Muster Assembly point will be identified during all site safety briefings for visitors, employees, and contract personnel.
- During the drilling and completion phases, all personnel and approved visitors to the facility will be required to enter through a manned security checkpoint. Upon checking in, employees and visitors will be provided a detailed safety briefing of current operations, all safety precautions that must be adhered to, and the location of the muster point. In addition, all personnel who enter the location must sign-out at the manned security checkpoint upon their departure. Gate watch personnel will maintain a current count of total personnel at the facility at any given time. In addition, the lead supervisor of each subcontractor company working at the facility is required to keep a personnel log and current count of their individual company's personnel on location.
- During the production phase, there will be no manned security checkpoint. The facility will initially be manned 24/7, transitioning to personnel onsite during daylights-only, then transitioning to daily visitations with no continuous personnel on-site. At all times, MRG's company representative and the lead supervisor of each subcontractor company working at the facility will be required to keep a personnel log and current count of their individual company's personnel on location.

SECTION 3 – LIST OF EMERGENCY CONTACTS

a) MRG, LP 2725 Rocky Mountain Avenue, Suite 200, Loveland, CO 80538 Name Office Phone Emergency/Cell Corporate Office 970-962-9990 970-669-7411 MRG EHS on-call 970-669-7411 303-356-6052 Emergency Manager - Bill Irwin

EHS Environmental -Trisha Fanning

b) MRG Community/Media Relations

EHS POC - Andy Peterson

Name	Office Phone	Cell Phone
Celeste Smith	970-962-9990	970-776-4036
Trisha Fanning	303-503-7539	303-503-7539

970-669-7411

303-503-7539

970-203-4263

303-503-7539

c) First Responders (Fire, EMS, HazMat)

Name	Emergency Number	Non-Emergency
		Number
*All emergency	notifications require notification t	o 911 first
LFRA Station #10	911	970-962-2471
LFRA Station #6	911	970-962-2471
Thompson Valley EMS	911	970-663-6025
Loveland Police	911	970-667-2151
Department		
Colorado State Highway	911	970-224-3027
Patrol		
Larimer County Sheriff	911	970-498-5100

d) Local, State, and Federal Contacts

Name	Emergency Number	Non-Emergency Number
Colorado Oil and Gas	303-894-2100	303-894-2100
Conservation Commission		
CDPHE	none	877-518-5608
Colorado Parks & Wildlife	none	303-291-7227
National Response Center	800-424-8802	none

e) Medical Facilities

Name	Office Phone
Medical Center of the Rockies, 2500 Rocky Mountain Ave,	970-624-2500
Loveland	
Banner North Colorado Medical Center, 1801 16 th St., Greeley	970-810-4121
Banner North Colorado Medical Center (Wound Care & Burn Unit)	970-810-6075

f) Spill Response Organization (Contracted)

Name	24/7 Emergency Number	Non-Emergency Number
Clean Harbors	303-371-1100	303-371-1100
Summit Energy Services	970-302-9331	970-302-9331

g) Other

Name	24/7 Emergency Number	Non-Emergency Number	
Greeley Loveland Irrigation Company	970-590-0299	970-352-0495	

SECTION – 4 SITE SPECIFIC INFORMATION

a) Site Description

The CE Pad will have fifteen (15) oil and gas wells drilled and producing at the facility. The drilling rig will be onsite and working 24/7 for approximately ninety (90) days, after which a hydraulic fracturing frac fleet will be on location 24/7 providing pressure pumping services for another sixty (60) days. After an approximately sixty (60) day flowback period, also operating 24 hours per day, the site will revert to the production phase. At this time it will be attended mostly during daylight hours only. During the production phase two 21,000 gallon water storage tanks will be on location for storage of produced water and will be marked as such. There will be no hydrocarbon storage tanks at the facility. All oil and natural gas will be pipelined off location.

b) Nearby Schools, High Occupancy Buildings, Waterways

- Schools None within 2500' of location.
- High Occupancy Buildings None within 2500' of location.
- Waterways Greeley-Loveland Irrigation Canal approximately 1,950' south of the facility.

c) Site Safety Requirements and General Safety Information

The minimum personal protective equipment (PPE) to enter any MRG production location includes hard hat, safety glasses, and safety toe boots. All contractors and visitors are responsible for providing their employees with the appropriate training on and use of PPE while on MRG locations. In addition, all contract personnel entering a MRG location to perform work must understand and abide by MRG's contractor expectations relating to environmental, health, and safety requirements.

The primary hazards that any person must be aware of while on a MRG production location include, but are not limited to, the potential for release of hydrocarbon gases and/or liquids from production equipment/tanks, heavy truck and equipment traffic, loud noise, high pressures, and the potential for a flash fire. These hazards can vary depending on the work being performed.

d) SDS: Depending on the operations taking place on location, chemicals stored on-site may vary. In accordance with 49 CFR 1910.1200, Safety Data Sheets (SDS) will be made available for site personnel performing work and for first responders in a centralized location onsite. During the drilling and completion phases SDS will be available in the MRG company representatives trailer. During the production phase SDS will be stored in a mailbox located at the entrance to the site.

e) Fire Suppression Water Supply

The nearest currently installed water hydrant is located approximately 3,500' NW of the entrance to the site,

too far from the facility to be used. Until infrastructure is developed closer to the facility, LFRA crews will have to bring their own water. MRG commits to having a certain amount of water storage on-site during al phases, accessible through a 5" Storz fitting with a 30° downward bend. During the drilling and completion phases, one of the proximate water storage tanks will be so equipped. During the production phase the tank or cistern installed for the landscape irrigation system will also be equipped with a 5" Storz fitting.

f) Heavy Equipment List

Item Description	Quantity
Three-phase separators	12
Vapor recovery	4
compressors	
Water storage tanks	2
Surge vessel	1
Gas sales meter	1
Oil pipeline pump &	1
meter (LACT)	
Emissions Control Device	1
combustor (ECD)	

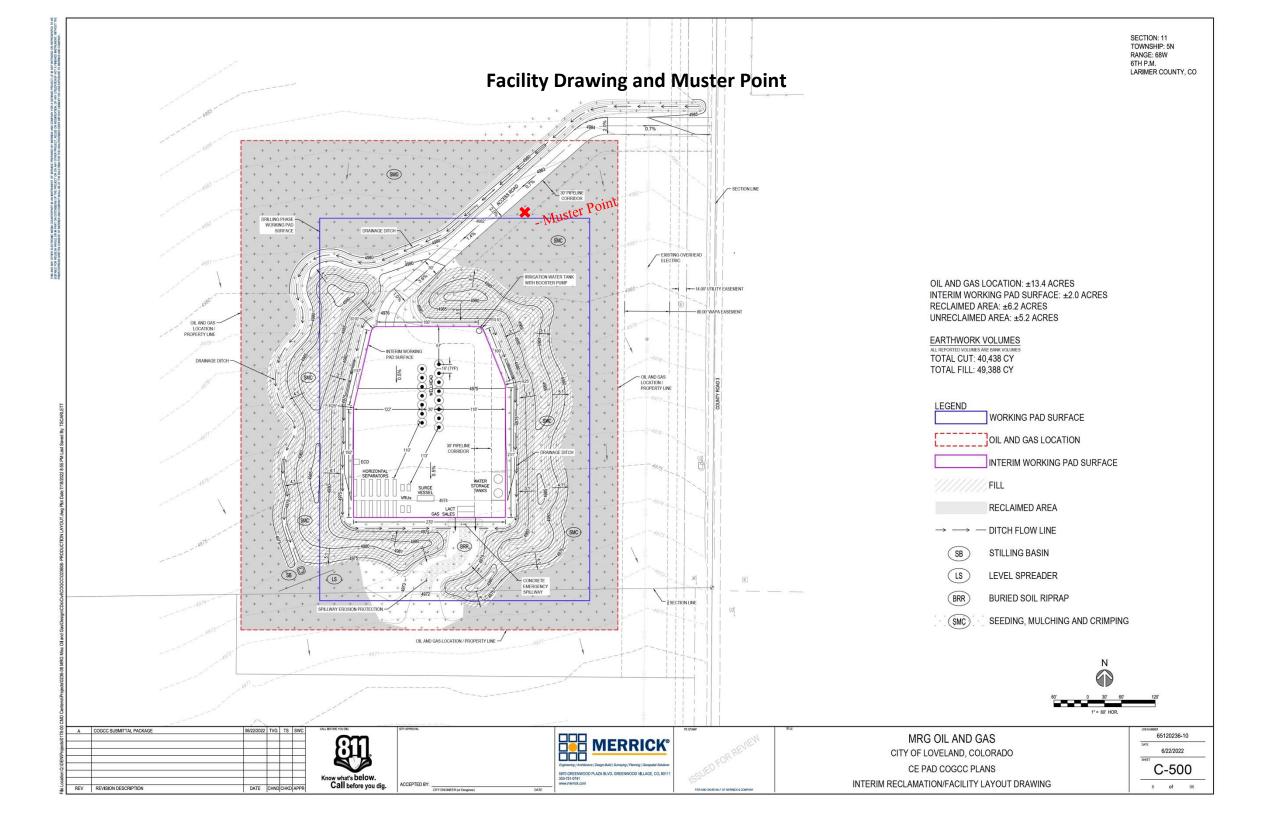
g) Flammable or Toxic Chemicals stored on-site during Drilling and Completion phases (Gallons)

Chemical Name	Storage Location	Quantity stored on-site	
Diesel Fuel	Various	10,000 gallons	

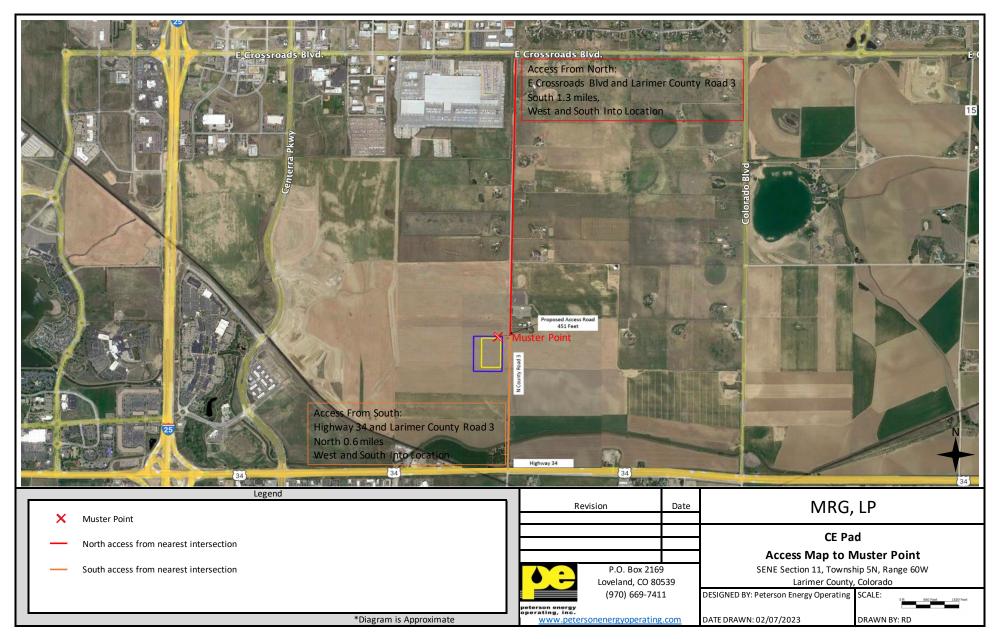
h) Flammable or Toxic Chemicals stored on-site during Production phase (Gallons)

Chemical Name	Storage Location	Quantity stored on-site	
Methanol (67-56-1)	Beside gas sales meter	500 gallons	

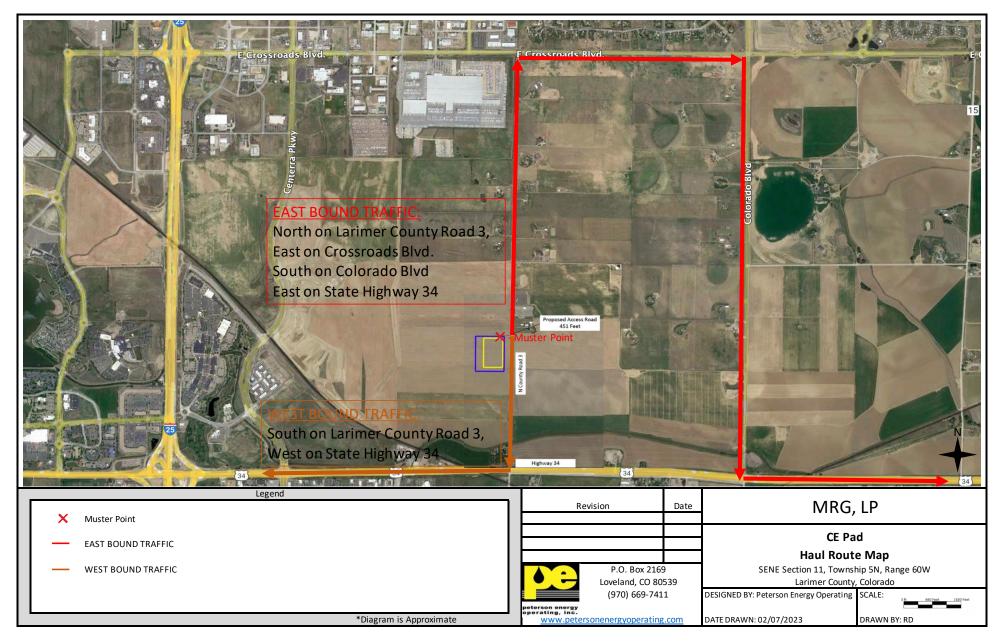
SECTION 5 – MAPS AND DRAWINGS



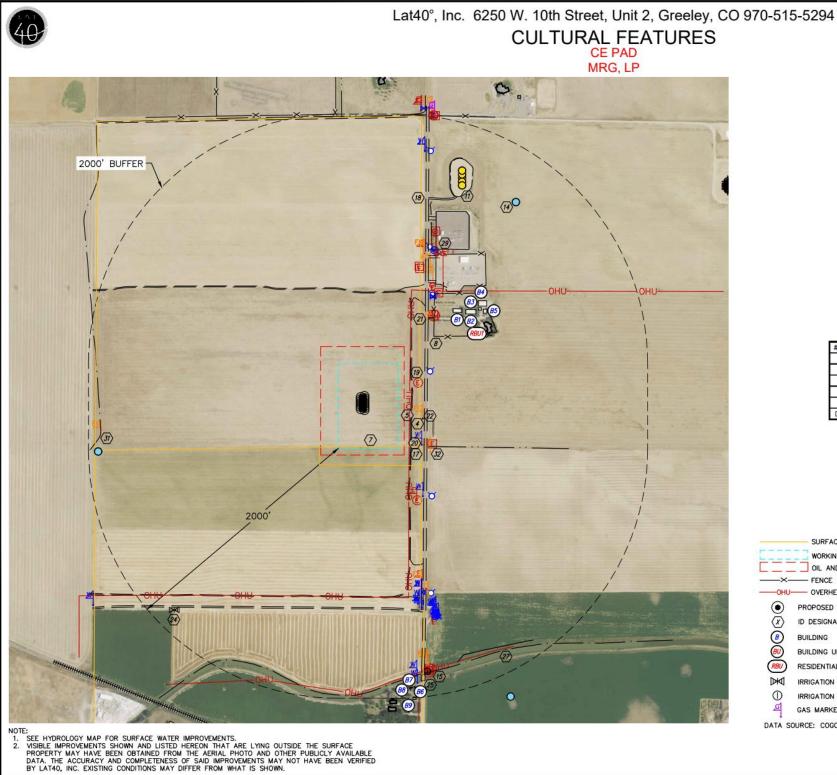
Project Location Access Map



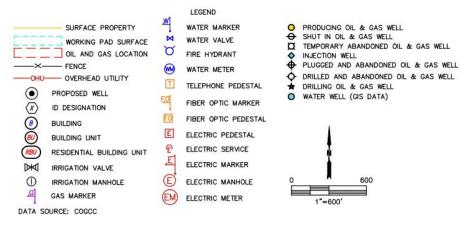
Haul Route /HazMat Delivery Route Map



Offsetting Residence and Distance to Features



# OF CULTURAL FEATURES WITHIN	0-500'	501-1000'	1001-2000'
BUILDING UNIT	0	1	0
RESIDENTIAL BUILDING UNIT	0	1	0
HIGH OCCUPANCY BUILDING UNIT	0	0	0
SCHOOL PROPERTY	0	0	0
SCHOOL FACILITY	0	0	0
DESIGNATED OUTSIDE ACTIVITY AREA	0	0	0



Q: NE/4, SE/4 SECTION: 11

TOWNSHIP: 5N RANGE: 68W 6TH. P.M. LARIMER COUNTY, CO

SECTION 6 – SPILL RESPONSE AND CLEAN-UP

a) Spill Response

Once a release has been discovered, the leak will be immediately stopped and contained if safe to do so. When containing a spill; a combination of sorbent rolls, pads, mats, socks, or containment boom may be deployed, or earthen berms will be constructed around the release to keep spilled material contained and from spreading. These materials will be provided by MRG and kept on-site. During a spill, efforts will be made to minimize contact with live vegetation, nearby drainage, rivers, creeks, or streams. If the release is outside of secondary containment or poses a threat to flow off site, or impact environmentally sensitive areas, the spill response contractor should be notified for cleanup assistance, if needed, and for removal and disposal of spilled materials and contaminated areas.

Before the Drilling phase begins, and in the event of a large incident requiring outside assistance/cascading resources, MRG will be contracted with a Consulting Spill Management Team (SMT) Company. This company will possess a working knowledge of MRG operations, emergency response and the Incident Command System (ICS). Once notified, this company will commit to being able to be on location within 12 hours.

b) Spill Reporting

The person reporting a spill will supply the minimum spill assessment information to provide a complete understanding of the incident as possible to local, state, or federal agencies if applicable. Some initial spill response actions and information that may be reported are presented below:

- A spill/release will be reported to the Loveland LEPC if released material is property of MRG and meets the reporting thresholds mandated by Section 304 of the Emergency Planning and Community Right-To-Know Act (EPCRA).
- A spill/release will be reported to COGCC if it meets the reporting threshold of one barrel outside of secondary containment and five barrels inside secondary containment, or any spill/release threatening waters of the state, a residence or occupied structure, wildlife, livestock or public byway.
- A spill/release will be reported to the CDPHE if released material is in the custody of a third party for spills meeting CDPHE reporting thresholds or are of any size that impact or threaten to impact waters of the state, a residence or occupied structure, wildlife, livestock or public byway.
- Once a spill is determined reportable, there is a 24-hour deadline to make initial notification to the COGCC, LEPC and CDPHE depending on the product ownership. Spills/releases in the custody of MRG will be reported by a Company representative. Spills/releases in the custody of a third party will be reported by the responsible company's EHS Department to the appropriate agency and to MRG.

These regulatory guidelines will be strictly followed by MRG and any contractors operating under MRG guidance during all activities at the facility.

SECTION 7 – REPORTABLE QUANTITIES

a) <u>Reportable Quantities</u>

Mandated by Section 312 of the Emergency Planning and Community Right-To-Know Act (EPCRA) – also known as SARA Title III – the Tier II form captures information about the types, quantities, and locations of hazardous chemicals at a given facility. The form also lists contact information for the facility's designated emergency point-of-contact.

Methane, Ethane, Propane and Benzene are on the EPA's Lists of Lists. While they will not be stored on site in reportable quantities, they are known to be contained in crude oil and natural gas.

b. <u>Reporting Requirements</u>

Per 40 CFR Part 370, MRG will submit a Tier II report to the State of Colorado every year before March 1st.

SECTION 8 – EVACUATION INFORMATION

a. Evacuation Plan Procedures (public)

The procedure to be used in alerting the public in the event of than incident which could pose a threat to life or property will be arranged and coordinated with LFRA.

In the event of an actual emergency, the following steps will be immediately taken:

- 1. The MRG representative will immediately notify first responders (911), to warn the public of a potential chemical exposure.
- 2. First responders may conduct door to door evacuation notices in addition to reverse 911 and utilizing the Integrated Public Alert and Warning System (IPAWS).
- 3. The MRG representative responsible for employees and contract personnel will monitor essential and non-essential personnel traffic on or near the incident site.
- 4. General:
 - a. The area included inside the facility fence is considered to be the zone with the maximum potential hazard. When it is determined that conditions exist which create an additional exposure area vulnerable to possible hazard beyond the facility fencing, traffic may be diverted and residences in the additional hazardous area may be evacuated.
 - b. In the event of an incident, after the residences have been evacuated and traffic diverted, it is expected that local authorities will have arrived and within a few hours will have assumed direction of and control of the public.
 - c. MRG personnel will cooperate with these authorities to the fullest extent possible and will make every attempt to supply accurate facility information and give advice to authorities to help deal with the incident, control rumors and prevent the spread of social media misinformation.

Nearby Residences:

Residence Address	Approx. Distance from Site	Homeowner/Tenant	Home phone	Cell phone
2490 N. CR 3	750' NE	Clyde Hemberger, owner	970-663- 2970	970-203- 4493
1431 N. CR 3	2,100' S	Steve Harari, owner		970-204- 9800
1431 N. CR 3	2,100' S	Brent Davis, tenant		970-302- 1257
1431 N. CR 3	2,100' S	Katy Davis, tenant		970-698- 1238
3077 N. CR 3	2,500' N	Steve & Gayle Schink		970-215- 4771

SECTION – 9 TRAINING AND EXERCISES

The National Incident Management System (NIMS) guides all levels of government, nongovernmental organizations and the private sector to work together to prevent, protect against, mitigate, respond to and recover from incidents.

NIMS provides stakeholders across the whole community with the shared vocabulary, systems and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS defines operational systems that guide how personnel work together during incidents.

MRG personnel will play a vital role in the Incident Management System (IMS) during an incident. MRG has a significant impact on local, regional, and national economic recovery, and is part of the whole community and essential to the function of the Community Lifelines.

To maximize MRG's impact and participation in incident operations, MRG commits to coordinate and integrate with LRFA first responders, including planning, training, and preparedness exercises. Exercises are an important component of testing an organization's response readiness, training and familiarity with various emergency response scenarios, participation and engagement with local and or state agencies, and to develop lessons learned to improve emergency response capabilities.

MRG proposes to at a minimum conduct tours of the facility for LFRA personnel and crews during all operations phases: drilling through production. The equipment layout and hazards present are different in all phases. LFRA personnel should be familiar with the layout of the facility and the equipment onsite for all development phases.

MRG and LFRA supervisory personnel also are committed to developing additional planning, training and preparedness exercises appropriate to ensure area first responders are prepared to protect the community in the event of an incident at the facility.

SECTION – 10 COORDINATION WITH FIRST RESPONDERS

- a) In the event of an emergency requiring LFRA assistance, Unified Command will be established between the MRG appointed company representative on location and first responders present. An Incident Command Post (ICP) and staging area will be established based on conditions present at time of incident.
- b) MRG's and LFRA have reviewed this EAP and have discussed coordination efforts in the event of an emergency situation requiring first responder assistance.

SECTION - 11 PLAN REVIEW AND UPDATE PROCEDURES

- a) Multi-year plan review and update: This plan will be reviewed and updated every five (5) years or after a change in personnel, operations or ownership.
- b) Post incident plan review and update: This plan will be reviewed after a spill/release or incident to determine whether plan components should be updated or changed.