BMP	Crestone Peak's Response - Air BMPS
Operator will implement ambient air quality monitoring on site	Yes, Operator agrees to implement ambient air quality monitoring on site.
Operator will appropriately time activities associated with high emissions to reduce the potential for exposure (e.g. if development is occurring near a high occupancy building unit, such as a school, then hydraulic fracturing, flowback or hydrocarbon liquids loadout will only occur when school is not in session)	BMP does not apply as there are no existing HOBUs within 2,000' of the proposed location. There is vacant land on the east side of I-25 that is owned by a private school. The property is currently zoned as "Agricultural" and described as "Dry Farm Land" per the County's zoning map (https://www.broomfield.org/DocumentCenter/View/290/Zoning?bidId=)
Operator will properly maintain vehicles and equipment	Yes, Operator maintains safe vehicle work practices including routine maintenance programs.
Operator will use non-emitting pneumatic controllers	Yes, Operator will use non-emitting pneumatic controllers.
Electrification: Operator will use electric drilling rigs	Yes, Operator will use an electric drilling rig(s).
Electrification: Operator will use electric pumps for hydraulic fracturing	No, this technology is not widely available or accessible in the DJ Basin.
Electrification: Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)	Yes, Operator will construct an electrified production facility.
Tankless design: Operator will not store produced water or hydrocarbon liquids in storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities)	Yes, the production facility will be a tankless design.
Operator will implement a "hybrid production flowack method" or "modern production flowback method" (unlike the conventional or legacy flowback method, which uses temporary equipment to separate the oil, natural gas and water, the "hybrid-production flowback method" or "modern production flowback method" eliminates tanks by routing the oil, natural gas and water directly to permanent production equipment)	Yes, Operator will not initiate production until permanent production facilities have been constructed.
Venting/Flaring: Operator will not flare or vent gas during completion or flowback, except in upset or emergency conditions, or with prior written approval from the Director for necessary maintenance operations	Operator will adhere to COGCC Rules as it relates to Venting/Flaring - e.g., 900-Series.
Venting/Flaring: Operator will control emergency flaring with an enclosed combustor with a destruction efficiency of 98% or better	Yes, Operator will control emergency flaring with an ECD that has a destruction efficiency of 98% or better.
Venting/Flaring: Operator will control bradenhead/casinghead venting	Operator will adhere to COGCC Rules as it relates to Bradenhead management - i.e., 400-Series, 900-Series.
Pipelines: Operator will use pipelines to transport water for hydraulic fracturing to and from location	Yes, Operator will utilize temporary pipelines to transport freshwater to location for use in hydraulic fracturing.
Pipelines: Operator will have adequate and committed pipeline take away capacity for all produced gas and oil	Yes, Operator will use pipelines for the transportation of natural gas and oil from location.
Pipelines: Operator will shut in the facility to reduce the need for flaring if the pipeline is unavailable	Operator will adhere to COGCC Rules as it relates to Venting/Flaring - e.g., 900-Series.
Pipelines: Operator will incorporate options for recycling produced gas onsite during pipeline downtime, such as: using the gas for gas lift systems, routing it to the facility fuel system, or installing a natural gas liquid (NGL) skid to process the gas onsite	Operator will adhere to COGCC Rules as it relates to Venting/Flaring - e.g., 900-Series.
Engines: Operator will use tier IV or better engines for drilling	Not Applicable.
Engines: Operator will use tier IV or better engines for hydraulic fracturing	Yes, Operator will use Tier IV or better engines for hydraulic fracturing.
Engines: Operator will use tier IV or better engines for nonroad construction equipment	No.
Engines: Operator will use tier IV or better engines for fleets accessing site (service vehicles, sand delivery, haul, produced water, etc.)	No.

BMP	Crestone Peak's Response - Air BMPS
Operator will use vapor recovery units (VRUs) to capture and route storage vessel gas to pipeline	Yes, Operator will utilize VRUs as part of the Production Facility.
Operator will use zero-emission desiccant dehydrators or 98% control of hydrocarbon emissions from glycol dehydrators	Not Applicable.
Operator will use compressors equipped with dry seals	No.
Operator will collect emissions from rod packing on reciprocating compressors and rout them through a closed vent system to a process or emissions control device	No.
Operator will use lease automated custody transfer (LACT) system to remove/reduce the need for truck loadout	Yes, Operator will incorporate a LACT system into the Production Facility servicing this pad.
Odor mitigation: operator will use group III drilling mud	Yes, Operator will employ IOGP Group III drilling mud.
Odor mitigation: operator will use a chiller to cool drilling fluid as it is piped through the recirculation system before routing to the suction tanks	Operator will utilize a mud chiller to aid in mitigating odors as necessary.
Odor mitigation: operator will cover trucks transporting drill cuttings	Yes, Operator will cover trucks transporting drill cuttings.
Odor mitigation: operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore	Yes, Operator will employ practices to "wipe pipe" when removing drill pipe from the wellbore.
Odor mitigation: Operator will ensure that all drilling fluid is removed from pipes before storage	The suggested BMP is neither achievable nor practical.
Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents	Operator will eliminate the use of paints and solvents containing VOCs as reasonably practical.
Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling	Yes, Operator will minimize vehicle and engine idling on Ozone Action Days as reasonably practical.
Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic	Yes, Operator will reduce traffic on Ozone Action Days as reasonably practical.
Ozone mitigation on forecasted high ozone days: operator will postpone the refueling of vehicles	Yes, Operator will postpone the refueling of vehicles on Ozone Action Days as reasonably practical and to the extent that doing so does not result in the termination of operations (etc).
Ozone mitigation on forecasted high ozone days: operator will suspend or delay the use of fossil fuel powered ancillary equipment	No.
Ozone mitigation on forecasted high ozone days: operator will postpone construction activities	No.
Ozone mitigation on forecasted high ozone days: operator will reschedule non-essential operational activities such as pigging, well unloading and tank cleaning	Yes, Operator will reschedule non-essential operational activities as reasonably practical.
Ozone mitigation on forecasted high ozone days: Operator will postpone flowback if emissions cannot be adequately captured with a vapor recovery unit (VRU)	Yes, Operational will postpone flowback activities on Ozone Action Days if emissions cannot be adequately captured with a VRU as reasonably practical.

BMP	Crestone Peak's Response - Water BMPs
Stormwater inspections: Operator will conduct stormwater inspections immediately after storm event	Yes, Operator will conduct stormwater inspections immediately after storm events.
Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations	Operator will adhere to the BMPs contained in it's Stormwater Management Plan developed in accordance with Rule 304.c(15). During construction, stormwater inspections will occur every 14 days. Post-construction inspections will adhere to Rules 1002.f and 1003.e.
Operator will use Modular Large Volume Storage Tanks	Yes, Operator will use MLVTs or similar catchments for freshwater storage to support hydaulic fracturing operations.
Secondary containment: Operator will install perimeter controls to control potential sediment-laden runoff in the event of spill or release from Modular Large Volume Storage Tank	Yes. Operator will utilize permeter controls to control sediment-laden runoff in the unlikely event of a release from a MLVT.
Operator will recycle or beneficially reuse flowback and produced water for use downhole	The recycling or beneficial reuse of flowback and produced water is not commercially practical at this time.
Vehicle fueling: Operator will refuel vehicles only on impervious surfaces and never during storm events	No.
Vehicle fueling: Operator will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections	Yes, Operator will have personnel trained on fueling procedures will be on-site during refueling operations.
Dust suppression: Operator will not use produced water or other process fluids for dust suppression	Yes, Operator will not use produced water or other process fluid for dust suppression.
COGCC permit will incorporate other agency water quality protection plans by reference as applicable (e.g. stormwater management plan)	Operator will adhere to the BMPs contained in it's Stormwater Management Plan developed in accordance with Rule 304.c(15).
Down gradient controls: Operator will install adequate down gradient controls if they can not have a control at the source	Yes, Operator will install adequare down-gradient controls as necessary and applicable.
Outfall locations: Outlet protection should be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow. Outlet protection should be provided where the velocity at the culvert outlet exceeds the maximum permissible velocity of the material in the receiving channel.	Yes, Operator will install outlet protection as applicable.
Stream crossing and Road Construction: Operator will ensure that control measures are designed, installed and adequately sized in accordance with good engineering, hydrologic and pollution control practices	Yes, Operator will utilize appropriate control measures as applicable.
Documentation / stormwater management plan: If it is infeasible to install or repair a control measure immediately after discovering a deficiency, operator will document and keep on record in the stormwater management plan: (a) a description of why it is infeasible to initiate the installation or repair immediately; and (b) a schedule for installing or repairing the control measure and returning it to an effective operating condition as soon as possible.	Yes, Operator will document and record conditions that cannot be addressed immediately and develop a schedule for making the necessary repairs based on the best available information at the time the deficiency is identified.

BMP	Crestone Peak's Response - Waste BMPs
Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream)	Yes, Operator is will properly characterize and dispose of all waste.
Operator will properly test for and dispose of TENORM	Operator will review CDPHE's 6 CCR 1007-1 Part 20 (TENORM) regulations to determine if they apply to operations at this location. As applicable, testing and disposal regulations will be adhered to.

BMP	Crestone Peak's Response - PFAS BMPs
Operator will not use fracturing fluids which contain PFAS compounds	Yes, Operator will not use hydraulic fracturing fluids that contain PFAS compounds.
Operator will provide funding for nearby fire district(s) to support transition away from PFAS-containing foam	Operator will coordinate with the Mountain View Fire Protection District to determine what if any assistance is need to transition away from PFAS-containing foam.
Operator will coordinate with nearby fire district(s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard	Operator will coordinate with the Mountain View Fire Protection District to evaluate the use of PFAS-free foams in supporting oilfield fire suppression efforts.
If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and exent of contamination	Yes, Operator will properly characterize the site to determination the level, nature and extent of contamination as applicable.
If PFAS-containing foam is used at a location: operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions	Yes, Operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions as applicable.
If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water	Yes, Operator will properly capture and dispose of PFAS-contaminated soil and fire & flush water as applicable.