CHECKLIST ENVIRONMENTAL ASSESSMENT

Proposed Action: Approve Drilling Permit (Form 22)

Project/Well Name: Pennel Unit 23XX-18B

Operator: Denbury Onshore, LLC

Location: T7N, R60E, Sec 18 NWSW

County: Fallon MT; Field (or Wildcat): Pennel

Proposed Project Date: 7/15/2022

I. DESCRIPTION OF ACTION

Denbury Onshore plans to drill a vertical well into the Silurian-Ordovician Formations 9,093' MD / 8,963' TVD. Surface casing to be set at 2,000' and cemented to surface.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED

Montana Bureau of Mines and Geology, GWIC website (Fallon County Wells).

US Fish and Wildlife, Region 6 website ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES, Fallon County

Montana Natural Heritage Program Website (FWP) Heritage State Rank= S1, S2, S3, T7N R60E

Montana Cadastral Website

Surface Ownership and surface use Section 18 T7N R60E

Montana Department of Natural Resources MEPA Submittal

2. ALTERNATIVES CONSIDERED

No Action Alternative: The proposed well would not be drilled.

Action Alternative: Denbury Onshore, LLC. would have permission to drill the well.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

3. AIR QUALITY

Long drilling time: No, 2-4 days.

Unusually deep drilling (high horsepower rig): No, triple derrick rig.

Possible H2S gas production: Yes, possible H2S gas, slight chance from Mississippian Formations.

In/near Class I air quality area: No Class I air quality area in the area of review.

Air quality permit for flaring/venting (if productive): Yes, DEQ air quality permit required under 75-2-211. AQB review.

Comments: No special concerns – using rig to drill to 9,093' MD / 8,963' TVD. If there are no gas gathering systems nearby, associated gas can be flared under Board Rule 36.22.1220.

4. WATER QUALITY

Salt/oil based mud: Surface hole to be drilled with freshwater mud system. Intermediate and production hole to be drilled with oil based mud system.

High water table: No high-water table at this well location.

Surface drainage leads to live water: No, A stock pond exits about 600 ft to the southwest. Lake Baker is located about ¼ of a mile to the west.

Water well contamination: No water wells within ½ mile radius.

Porous/permeable soils: Sandy clay.

Class I stream drainage: No class I streams in the area.

Groundwater vulnerability area: No.

Mitigation:

__ Lined reserve pit:

X Adequate surface casing

__ Berms/dykes, re-routed drainage

X Closed mud system

<u>X</u> Off-site disposal of **solids**/liquids (in approved facility)

Comments: Steel surface casing to be set and cemented to surface to protect ground water. (Rule 36.22.1001).

5. SOILS/VEGETATION/LAND USE

Vegetation: Area is grassland.

Stream crossings: No stream crossings anticipated.

High erosion potential: Small cut of 4.0' and medium fill of 3.1' required.

Loss of soil productivity: No, location will be restored after drilling if nonproductive.

Unusually large wellsite (Describe dimensions): No, 400' X 400' location for a two well pad.

Damage to improvements: Slight.

Conflict with existing land use/values: Slight.

Mitigation

- __ Avoid improvements (topographic tolerance)
- __ Exception location requested
- X Stockpile topsoil
- __ Stream Crossing Permit (other agency review)
- X Reclaim unused part of wellsite if productive
- Special construction methods to enhance reclamation

Access Road: Access will be off Coral Creek Rd, existing dirt road, and a new access of 318' will be built into location.

Drilling fluids/solids: All drill cuttings will be collected in temporary metal pits at the surface and then hauled to a disposal facility.

6. HEALTH HAZARDS/NOISE

Proximity to public facilities/residences: Multiple residents within a ½ mile radius and requires notification to the owners of the occupied structures. City of Baker is about 1/5 of a mile to the north. Possibility of H2S: Yes, possible H2S gas, slight chance from Mississippian Formations. Size of rig/length of drilling time: Triple derrick rig, 2-4 days drilling time.

Mitigation:

- X Proper BOP equipment
- __ Topographic sound barriers
- __ H2S contingency and/or evacuation plan
- __ Special equipment/procedures requirements
- __ Other:

7. WILDLIFE/RECREATION

Sage Grouse: In general habitat and requires sage grouse approval from the Sage Grouse Habitat Conservation Program.

Proximity to sensitive wildlife areas (DFWP identified): None.

Proximity to recreation sites: None.

Creation of new access to wildlife habitat: No.

Conflict with game range/refuge management: No.

Threatened or endangered Species: Species listed as endangered or threatened in Fallon County are the Whooping Crane, Northern Long-eared Bat, and piping Plover. The Montana Natural Heritage Program

website lists five (5) species of concern: Swift Fox, Chestnut-collared Longspur, Greater Sage-Grouse, Baird's Sparrow, and Bobolink.

Mitigation:					
Avoidance (topographic tolerance/exception)					
Other agency review (DFWP, federal agencies, DNRC Trust Lands)					
Screening/fencing of pits, drillsite					
Other: Comments: Private grazing surface lands. There may be species of concern that maybe impacted by this wellsite. We ask the operator to consult with the surface owner as to what he would like done, if a species of concern is discovered at this location. The Board of Oil & Gas has no jurisdiction over private surface lands. No concerns.					
IV. IMPACTS ON THE HUMAN POPULATION					
8. HISTORICAL/CULTURAL/PALEONTOLOGICAL					
Proximity to known sites:					
Mitigation					
avoidance (topographic tolerance, location exception)					
other agency review (SHPO, DNRC Trust Lands, federal agencies)					
Other:					
9. SOCIAL/ECONOMIC					
Substantial affect on ton book					
Substantial effect on tax base Create demand for new governmental services					
Population increase or relocation					
Comments: No concerns.					
IV. SUMMARY					

No long term impacts expected. Some short term impacts will occur, but can be mitigated. I conclude that the approval of the subject Notice of Intent to Drill (does/<u>does not</u>) constitute a major action of state government significantly affecting the quality of the human environment, and (does/<u>does not</u>) require the preparation of an environmental impact statement.

EA Checklist	Name:	John Gizicki	Date:	04/04/2022
Prepared By:	Title:	Compliance Specialist		