Hughes 11-90-26 Natural Gas Well Project
SG Interests I Ltd.
Application for an Oil and Gas Permit under the
Gunnison County Temporary Oil and Gas Regulations

1) Applicant:

SG Interests I Ltd.
Catherine Dickert
Environmental and Permitting Manager
1544 Oxbow Drive, Suite 202
PO Box 26
Montrose, Colorado 81402
Phone: 970-209-6464
Fax: 970-252-0636
Email: cdickert@sginterests.com

2) Surface Ownership:

Landowner Name	Landowner Contact	Project Component
Nick Hughes	708 1250 Road, Delta, CO 81416 970-874-1836	Well Pad, Pipeline Route and Access Road
Aspen Leaf Ranch Inc.	Larry and Rosalie Moore 4956 Old Wagon Rd, Delta, CO 81416 Local phone number: 970-929-5201 Denver phone number: 303- 756-9601	Pipeline Route

Agreements with surface owners are included in Appendix A.

3) Mineral Owner

The minerals are owned by Nick Hughes and leased to SG Interests (see attached lease documents, Appendix B). See the Site Plan Map for the boundary of the mineral ownership (section 9 below).

4) Parcel Location:

Parcel Number	Landowner	Legal Description	Common Address
292100000027	Nick Hughes	Lots 6 (36acres), 7 (16.22 acres), and S2SW4 in section 26 and Lot 3 (36.16 acres), W2SE4, SE4SE4 in section 27 and E2 in section 34, all of section 35, S2NE4, W2, SE4 of section 36 all in T11S R90W totaling 1,808.48 acres.	None
292100000027	Aspen Leaf Ranch Inc.	984.07 acres in sections 22, 23, 25, 26, 27 T11S R90W.	3093 County Road 265

5) Identification of Previously Approved Uses:

There are three Pasco Spadafora natural gas wells located on the Aspen Leaf Ranch parcel (2 active, 1 dry, abandoned). The Federal 11-90-26 #1 well is located on the Aspen Leaf Ranch parcel as well. The Federal 11-90-35 #1 natural gas well is located on the Hughes parcel. SG Interests has permitted and constructed two natural gas pipelines through these parcels as well; Aspen Leaf

received SCANNED 1.9.17

Pipeline and the Hotchkiss Lateral. Gunnison Energy Corporation has also constructed and operates a natural gas pipeline through this parcel.

6) Characteristics and Current Condition of the Operation Location:

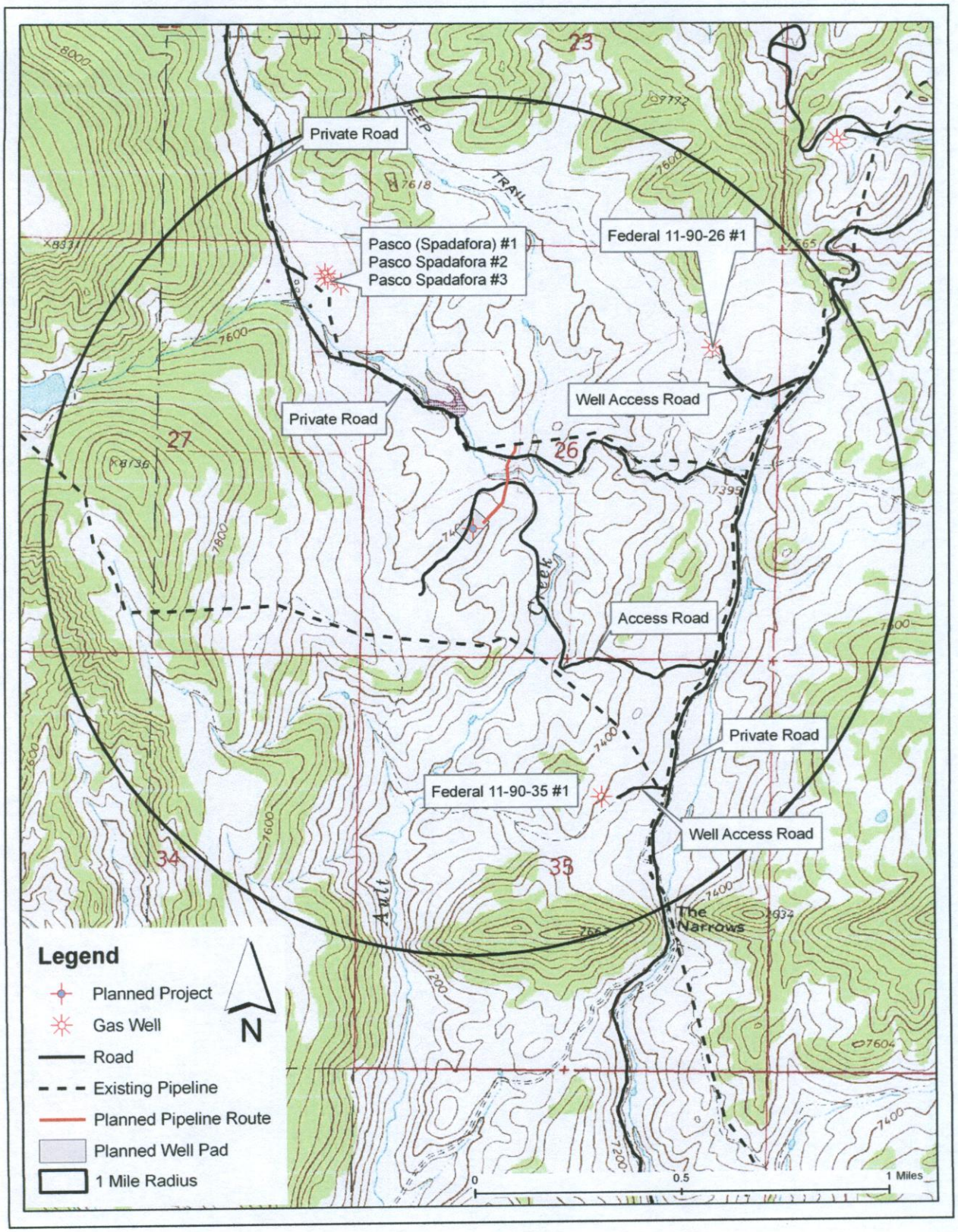
The project will be constructed in dry rangeland. There are stock ponds scattered around the landscape. An existing ranch road leads to the well pad location. The well pad, pipeline route, and access road will be located on soils mapped as Fughes loam, 15-25% slopes and Bulkley clay loam, 25-65% slopes (USDA soil data). Vegetation in the area is composed of big sagebrush with grasses and native forbs in the understory.

7) List of Adjacent Landowners

Parcel Number	Landowner	Contact Information
2987-000-00-001	GUNNISON HUNTING PROPERTIES LLC	100 WAUGH DR, STE 400, HOUSTON, TX, 77007
2989-000-00-010	HOTCHKISS RANCHES INC	PO BOX 479, HOTCHKISS, CO, 81419
2921-000-00-021, 2921-000-00-022, 2987-000-00-002	HUGHES NICK R	708 1250 ROAD, DELTA, CO, 81416
2921-000-00-023	MEMERE FAMILY LLLP	10543 3300 RD, HOTCHKISS, CO 81419
2921-000-00-033	ROCK CREEK RANCH I LTD	100 WAUGH DR, STE 400, HOUSTON, TX, 77007
2921-000-00-026	SANDRIDGE ROBERT R	2498 S ELDRIDGE CT, LAKEWOOD, CO 80228
2919-000-00-091	THEODORE R ECK TRUST, THEODORE R ECK TRUSTEE	PO BOX 8, ORFORD, NH, 03777
2921-000-00-032, 2987-000-00-014	U S D A - FOREST SERVICE	PO BOX 2000, WASHINGTON, DC, 20013

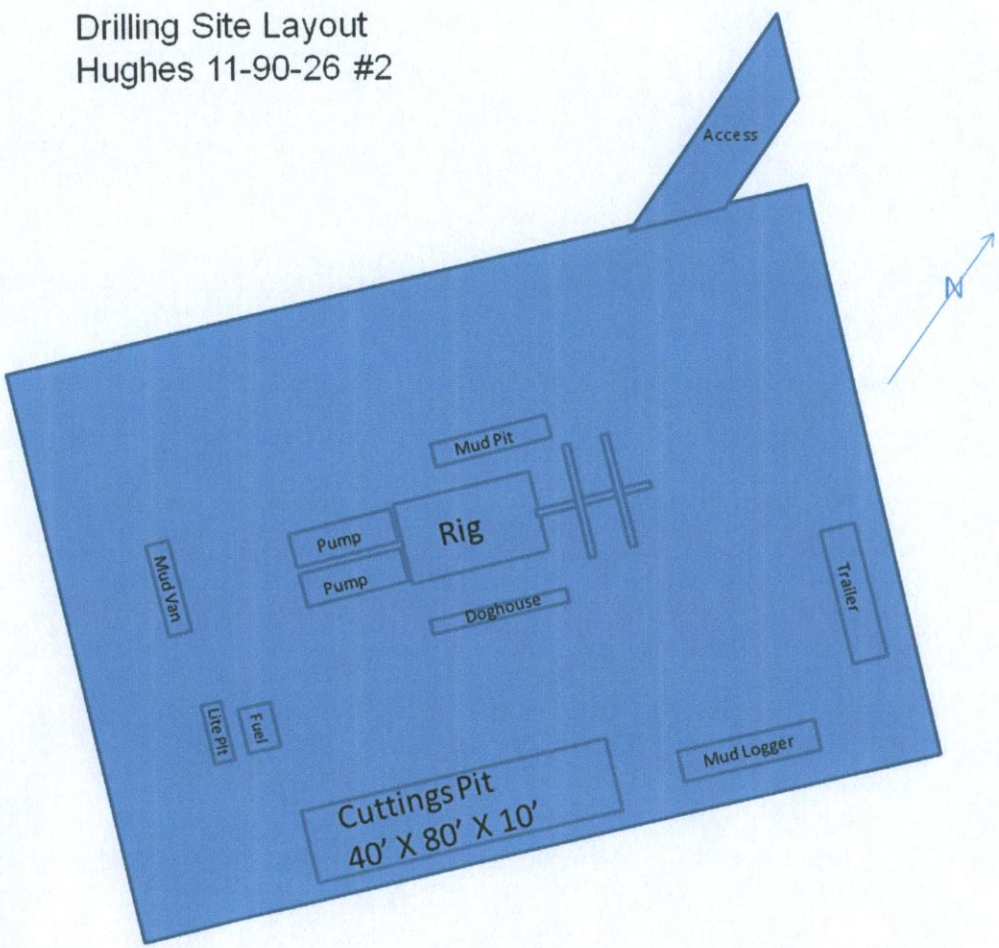
8) Vicinity Map:

There are no subdivisions, special districts or municipalities within one mile of the project site.

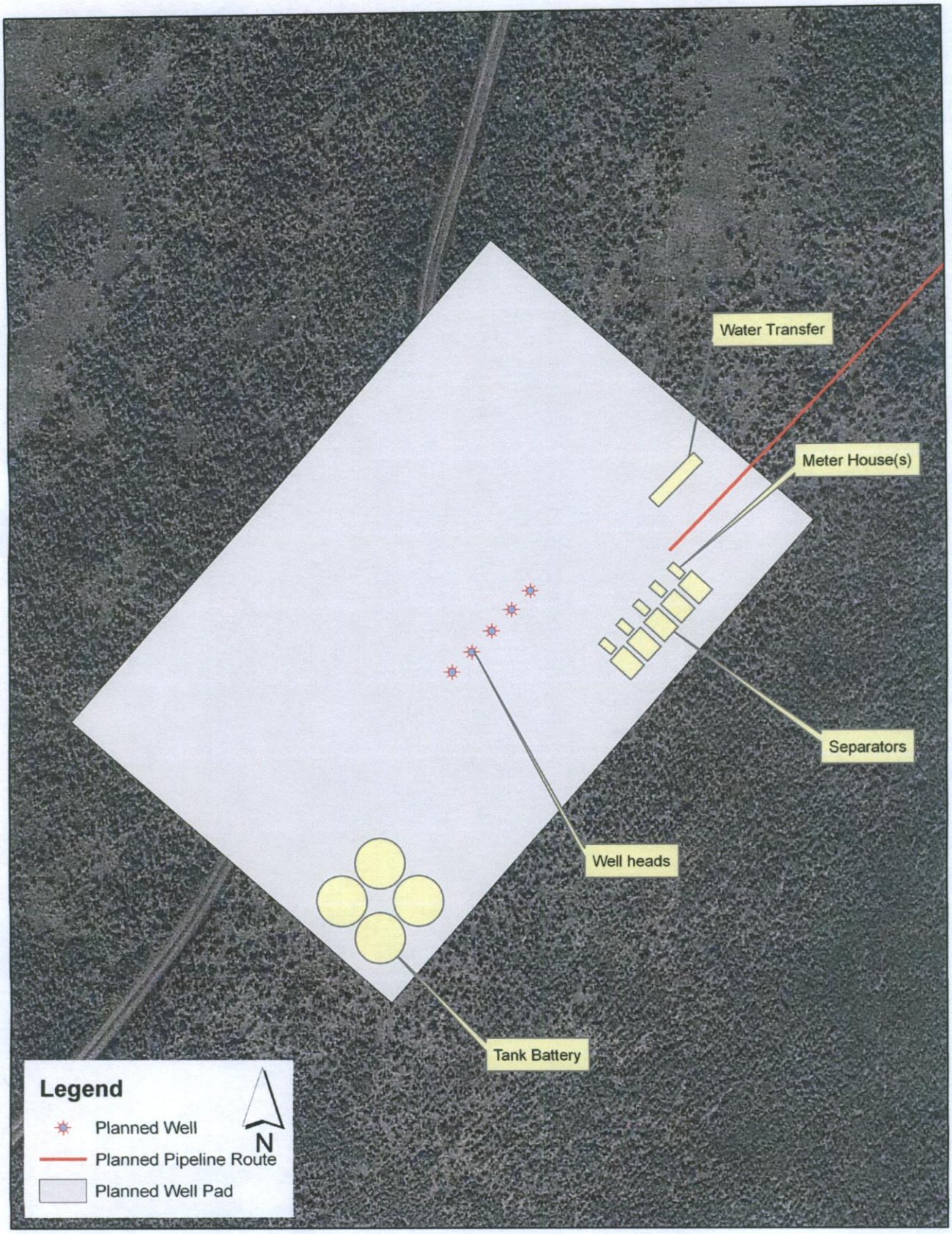


9) Site Plan Map:

Proposed facilities for the Hughes 11-90-26 well project are shown on the following diagrams. The size and shape of the cuttings pit are variable and depend on site conditions. For each well drilled on this pad, the drilling rig would move approximately 15' further toward the road entrance end of the pad. Below is a drawing of the facilities on site during the drilling of a gas well. Up to five gas wells may be drilled on the Hughes 11-90-26 well pad.

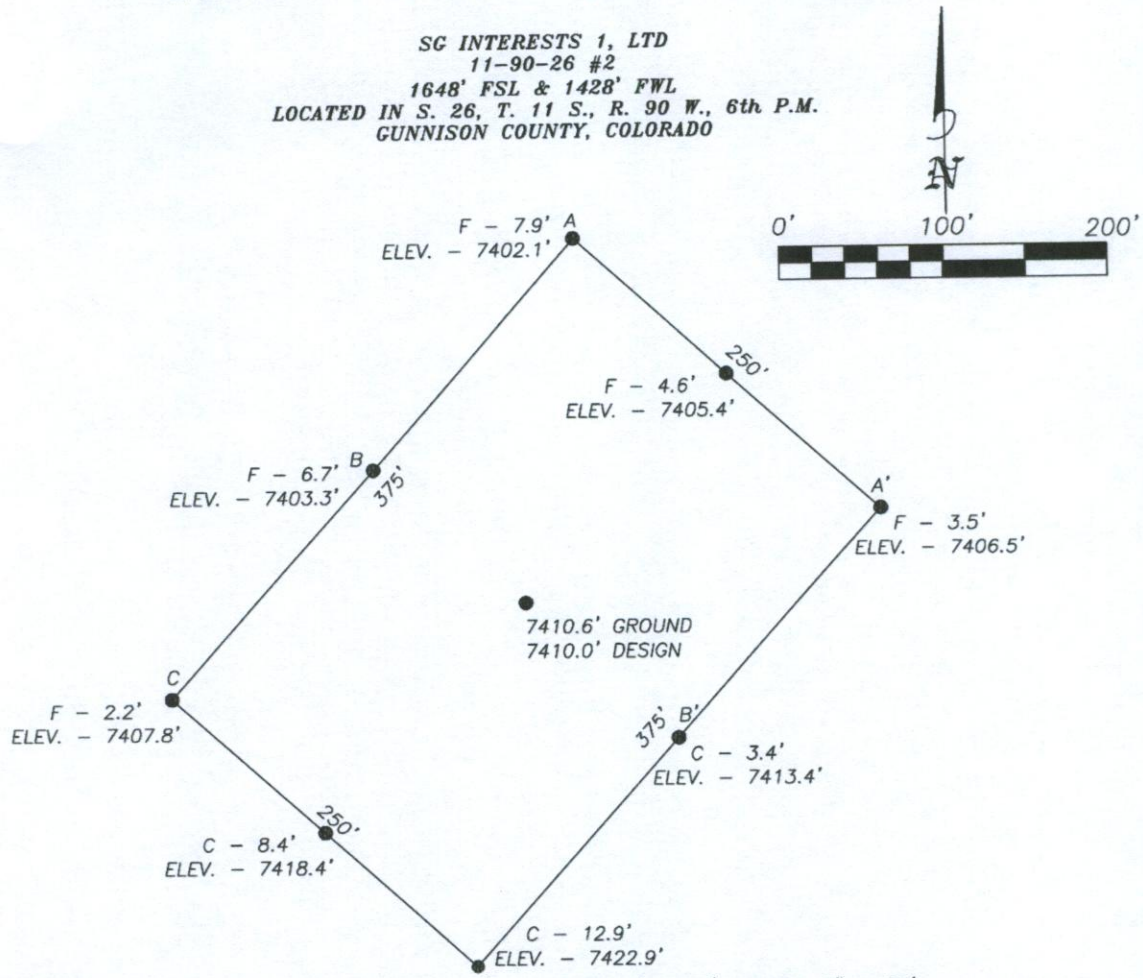


During production:



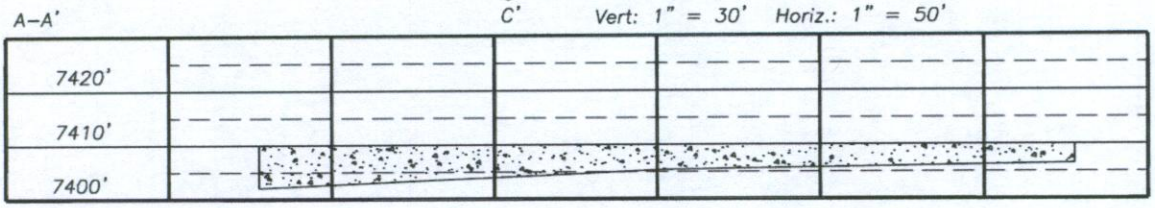
GAS WELL LOCATION

SG INTERESTS 1, LTD
11-90-26 #2
1648' FSL & 1428' FWL
LOCATED IN S. 26, T. 11 S., R. 90 W., 6th P.M.
GUNNISON COUNTY, COLORADO

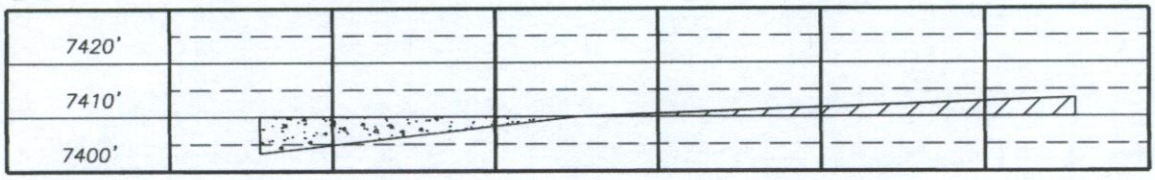


Vert: 1" = 30' Horiz.: 1" = 50'

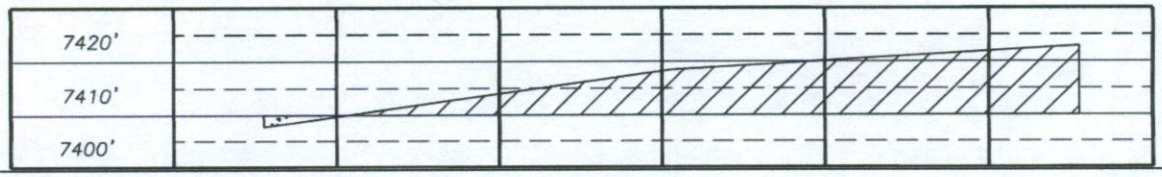
A-A'

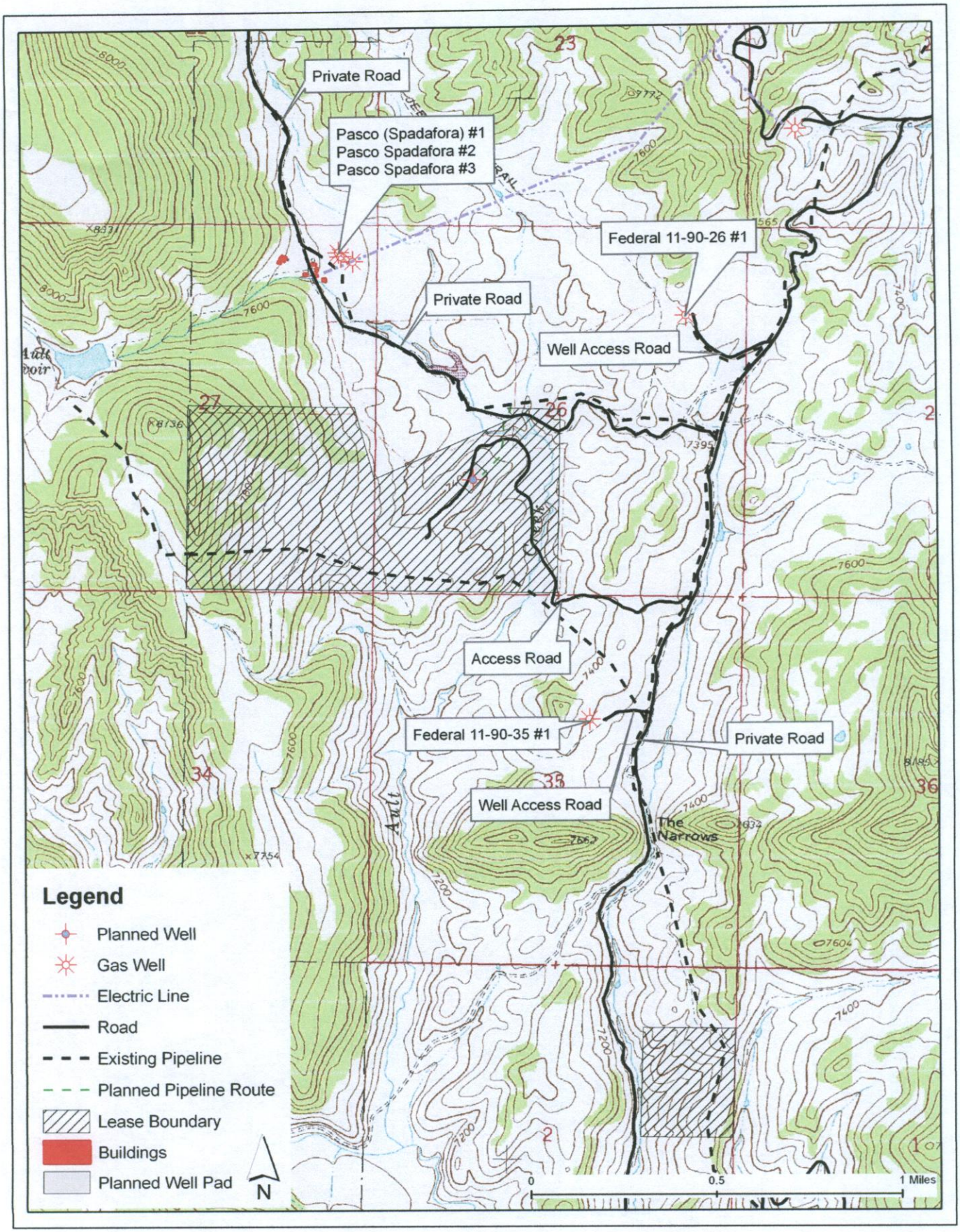


B-B'



C-C'




Private Road
Pasco (Spadafora) #1
Pasco Spadafora #2
Pasco Spadafora #3
Federal 11-90-26 #1
Private Road
Well Access Road
Access Road
Federal 11-90-35 #1
Private Road
Well Access Road
The Narrows
Legend
Planned Well
Gas Well
Electric Line
Road
Existing Pipeline
Planned Pipeline Route
Lease Boundary
Buildings
Planned Well Pad
N
0
0.5
1 Miles

10) Applications and Permits:

This project will be permitted through the Colorado Oil and Gas Conservation Commission. Field assessments of the anticipated wetland crossings for the pipeline route and the access road upgrades will be conducted in order to determine the level of US Army Corps of Engineers permitting required. Approved permits will be provided to Gunnison County.

11) Operation Plan:

METHOD FOR DRILLING: Each well will be drilled using a conventional rotary drilling rig operating 24 hours/day. Water, drilling mud and/or air may be used as drilling fluids. Cuttings and drilling fluids will be kept in a plastic-lined reserve pit.
METHOD FOR COMPLETION: Each well will be completed using a conventional daylight rig. Hydraulic fracturing is the planned stimulation technique for these wells.
METHOD FOR TRANSPORTING: If productive, gas will be transported by buried pipeline. Produced water will be trucked or transported by buried pipeline.
METHOD OF PRODUCTION: Production will be by conventional means. If artificial lift is needed, a pumping unit will likely be used.
METHOD OF POST–OPERATION: If production is non-commercial, the well will be plugged and abandoned according to COGCC regulations. The location will be reclaimed according to COGCC regulations and surface owner agreement.

PROPOSED SCHEDULE:

Activity	**Approximate Start Date**	**Estimated Time to Complete**
Clear Vegetation	Assuming migratory bird nest surveys are negative – 07/01/2012 If nests or nestlings are found, vegetation clearing will occur after 07/15/2012 or later when nestlings have left the area	2 days
Construct well pad	07/16/2012 (assuming no nests or nestlings)	1 month
Drilling Operations (first well)	08/15/2012	10 days
Completion Operations	08/27/2012	10-14 days
Transporting Operations	08/28/2012	07/07/2012
Testing Operations	9/12/2012	90 days
Production Operations	10/31/2012 (or when facilities are ready for use)	
Drilling of Subsequent Wells	Unknown at this time	10-35 days depending on conditions and well type
Post-Operation	Unknown	

12) Weed Management Plan:

Please see attached management plan (Appendix C).

13) Access and Transportation Routes:

The number and types of vehicles expected to travel to the project site during drilling and completion activities for each well are listed in the tables below:

Vehicles for pad, access road, and pipeline construction:

Type of Vehicle	Weight in Pounds	Estimated Round Trips
Gravel trucks	110,000	160
Semi trucks	37,000	4 (1 round trip loaded and 1 round trip unloaded)
Pick-up trucks	6,000	40
Motor grader	40,000	1 (on semi trailer)
Dozer (2)	19,000	2 (on semi trailer)
Trackhoe	43,000	1 (on semi trailer)

Vehicles associated with drilling first well on pad:

Type of Vehicle	Weight in Pounds	Estimated Round Trips
Drilling/Completion Rig	120,000	2
Rig-Up Trucks Loaded	120,000	45 (incl. cement, frac, etc)
Rig-Up Trucks Empty	36,500	45
80 bbl water trucks loaded	54,000	40
80 bbl water trucks empty	25,000	40
Crew-cab pick ups	6,000	65

Vehicles associated with drilling each subsequent well on that pad:

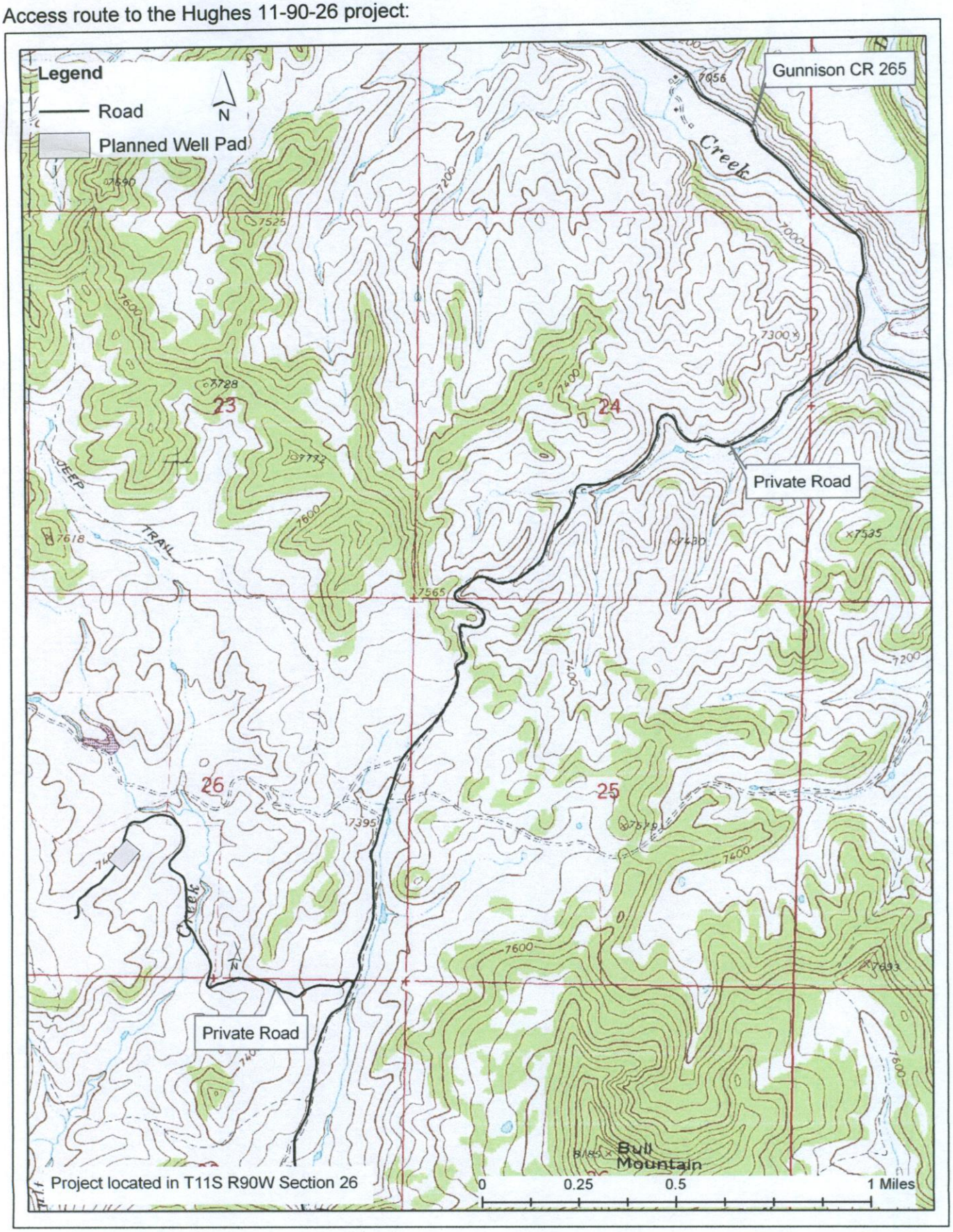
Type of Vehicle	Weight in Pounds	Estimated Round Trips
Motor Grader	50,000	2
Drilling/Completion Rig	120,000	2
Rig-Up Trucks Loaded	120,000	45 (incl. cement, frac, etc)
Rig-Up Trucks Empty	36,500	45
80 bbl water trucks loaded	54,000	45
80 bbl water trucks empty	25,000	45
Crew Cab Pick-Ups	6,000	65

Vehicles associated with well production:

Type of Vehicle	Weight in Pounds	Estimated Round Trips
Workover rig	120,000	1 round trip every two years
Haul trucks	120,000	6
Pick-up trucks	6,000-10,000	Daily throughout production period

County Road 265 is the only Gunnison County Road used to access the project site.

Access route to the Hughes 11-90-26 project:



14) Identification of Water Structures

There are no irrigation ditches or other water structures in the vicinity of the project that would be impacted by the proposed construction. The project would have no impact on water rights.

15) Roadway Impact Analysis

Please see section 13, Access and Transportation Routes, above for a list of vehicles and equipment associated with this project and the predicted number of round trips that these vehicles will make over the course of drilling and completing the well. During production, it is expected that 1 pick-up truck will visit the well site daily. Oversize/overweight load permits will be acquired as necessary from Public Works prior to use of the County Road 265. County Road 265 is the only public road under the jurisdiction of Gunnison County. Colorado Department of Transportation will issue the permits for use of State Highway 133 as needed. SG Interests, Gunnison Energy Corporation, and Gunnison County have entered into an agreement to maintain CR 265 by grading and applying magnesium chloride (LI #10-241). Gunnison County Public Works will grade the road yearly and apply the magnesium chloride as needed with reimbursement by SG Interests and Gunnison Energy Corporation. By following the terms of the agreement with Gunnison County and the stipulations attached to road use permits, SG will mitigate any potential impacts to roadways in the county.

16) Wildlife and Wildlife Habitat Analysis:

The US Fish and Wildlife Service has advised that they do not need to be involved in this process on private lands where there are no threatened or endangered species. A letter has been sent to the Colorado Division of Wildlife District Wildlife Manager, Kirk Madariaga requesting feedback on this proposal.

SG presents in this application a report written by Rocky Mountain Ecological Services that describes the types of wildlife and habitat that can be found in the project area (Appendix D).

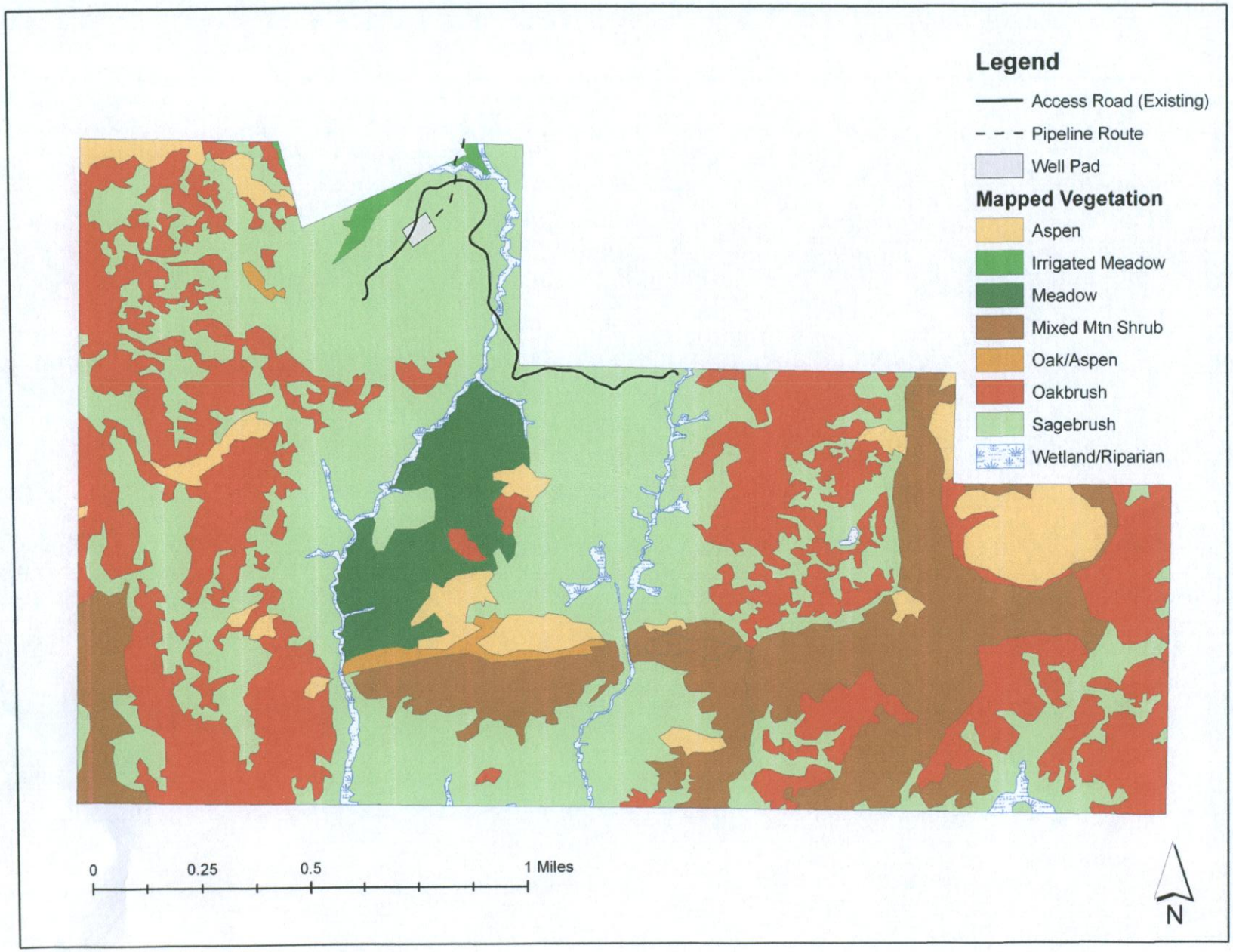
17) Vegetation

Mapped vegetation types on the subject parcel:

Mapped Vegetation	Acres on Parcel	% on Parcel
Irrigated Meadow	7.3	0.4
Oak/Aspen	13.0	0.7
Wetland/Riparian	34.4	1.9
Meadow	81.8	4.5
Aspen	104.8	5.8
Mixed Mtn Shrub	280.4	15.4
Oakbrush	497.1	27.3
Sagebrush	802.9	44.1
Grand Total	**1821.6**	**100.0**

The entire project, with the exception of the wetland crossings on the pipeline route and access road, would be constructed in sagebrush vegetation. The vegetation mapping indicates that the pipeline route and access road each have one wetland/riparian vegetation type crossing. These areas will be specifically delineated and the acreage of wetland impacts will be calculated for the US Army Corps of Engineer's permit.

The sagebrush type is the most common vegetation type in the unit (38.7% of the mapped vegetation). The impacts to vegetation would be mitigated by seeding the areas not needed for long term operations and by controlling noxious weeds at the project site.


Legend
Access Road (Existing)
Pipeline Route
Well Pad
Mapped Vegetation
Aspen
Irrigated Meadow
Meadow
Mixed Mtn Shrub
Oak/Aspen
Oakbrush
Sagebrush
Wetland/Riparian
0
0.25
0.5
1 Miles
N

18) Emergency Response Plan:

Project Name Hughes 11-90-26 Natural Gas Well Project
(Revised 11/14/2011)
NESW Section 26 T11S R90W
1648' FSL and 1428' FWL
Gunnison County, CO

Latitude/Longitude: 39.06835° N
-107.41945° W

Directions: From Paonia, CO, travel approximately 15 miles NE on State Hwy 133. Turn left (NW) on CR 265 (Muddy Creek Road) and travel approximately 1.0 miles to a ranch road going west (left), through gate and follow road to the well site approximately 2 6/10 miles to the well access road. Turn west (right) and travel approximately 1 mile to the well location. A vicinity map is attached.

Operator:
SG Interests I. Ltd.
P.O. Box 26
Montrose, CO 81402
Office: (970) 252-0696
Cell: (970) 259-2759

Engineer:
Dennis Romero,
Office: (713) 333-6545
Cell: (713) 301-3011

Site Supervisor:
Dennis Beasley
Cell: (505) 947-3564
Office: (970) 929-5313

Company man:
Floyd Traux
Cell: (337) 458-0535

Surface Owner:

Nick Hughes
708 1250 Road, Delta, CO 81416
Phone: 970-874-1836

Safety standards and practices consistent within the oil and gas industry shall be used at all times during drilling, completion, testing, and production operations. Third party contractors and companies (collectively referred to as contractors) providing services and materials in support of SG Interests I, Ltd. (SG) drilling, completion, testing, and production operations are required to have insurance coverage and a safety program in place. Contractors shall comply with and be responsible for the training and enforcement of its own safety procedures and practices which will comply with all applicable federal, state and local health, environmental and safety statutes and regulations, including, where applicable, but not limited to, those of the Department of Transportation (DOT), the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). All safety apparel and equipment for contractor's personnel shall be furnished by the contractor and shall meet the standards of applicable regulatory agencies.

Communications and Emergency Reporting: A "land line" telephone generally is not available at the well site. However, it is our intent to establish a land line in the vicinity of our operations. Site communications will be provided via trucked radio service and/or a satellite telephone. Phone numbers will be provided when available. Satellite telephone communications are generally not compatible with the nationwide 911 reporting system and can result in mis-routing of emergency service requests that are initiated by a 911 call. Therefore, all requests for emergency services from satellite telephones must be dialed to the appropriate Emergency Dispatch number. Requests for emergency services from land lines or cell phones can be initiated by dialing 911. Gunnison County has "mutual aid agreements" in place with Delta County. Agencies responding to emergencies in this area will be from Delta County.

Delta County Emergency Dispatch Phone Number: 970-874-2015 or 911

Emergency and other contact phone numbers will be made available and will be posted as appropriate, depending on operations i.e. drilling, completion, testing, etc. In addition, an Emergency Preparedness form (copy attached) will be completed and sent to Rob Fiedler, Delta County Emergency Preparedness Coordinator, prior to commencement of operations. This form provides information regarding well location, directions, contact names and contact information as well as anticipated activity dates.

Emergency Reporting: Emergency phone numbers plus other contact phone numbers, location information, and directions will be made available to SG's contractors. Depending on the phase of activity, emergency response calls could be initiated by contract or SG personnel. Spills, fires, accidents, etc. will be reported to emergency agencies and regulatory authorities. All valves, tanks, lines, etc. will be secured any time facilities are unattended. Pits will be fenced.

Reference Colorado Oil and Gas Conservation Commission (COGCC) web site at http://oil-gas.state.co.us for Rules and Regulations. 600 Series Safety Regulations (606A Fire Prevention and Protection). These Rules and Regulations will be strictly followed and enforced on all SG Interests I, Ltd operations. BLM fire restrictions can be viewed online at: www.co.blm.gov/fire (Fire Bans/ Restrictions & Closures). This site also provides links to:

1) The Colorado Office of Emergency Management and lists counties with fire restrictions and
2) The Colorado State Forest Service which supplies large fire status and other information.

Fire Prevention and Protection: COGCC Rules and Regulations as detailed in 606A will be strictly followed and enforced. Typically, 4-6 50# fire extinguishers will be suitably located, readily accessible, and plainly labeled as to their type and method of operation. Additional fire extinguishers will be made available if circumstances dictate. The rig fresh water system, pumps and hoses are also available for fire fighting in the rig area. If required, or deemed necessary, additional fire-fighting equipment will be kept on location during operations. This equipment may consist of a 400 bbl tank filled with fresh water, a pump and 300' of hose. Personnel on location will be indoctrinated as to proper use and safety. In the event that extreme fire danger exits due to drought or other reasons, SG will curtail or suspend operations as directed by authorities.

In the unlikely event that gas is escaping from the well during drill operations, it will be conducted a safe distance from the well and burned. Delta County Emergency Dispatch will be notified of any such flaring. Such notice shall be given prior to the flaring if the flaring can be reasonably anticipated, and in all other cases as soon as possible but in no event more than two (2) hours after the flaring occurs. (COGCC Rules and Regulations 317 (l)).

In the extremely unlikely event of a well fire (a fire that includes a discharge of flammable gas and/or liquid from the wellbore) or explosion, all personnel will gather at a predetermined safe briefing area. A head count will be taken and all personnel will be accounted for. The situation will be accessed with immediate response and emergency calls as needed. An employee or other representative will be sent to the nearest county road access to keep unauthorized persons from entering the location and to direct emergency response personnel to the site. Emergency response personnel should not attempt to extinguish the fire since special resources may be required to completely contain the fire and discharge and to prevent re-ignition. In these circumstances, SG's site supervisor will determine if any fire containment or flow cooling efforts might be appropriate in the interim.

The location and operation of block valves and shut-in procedures will be made available to appropriate personnel prior to any pipeline tie-in installation. If warranted, existing pipelines will be shut-in and depressurized prior to and during operations.

Hydrogen Sulfide gas (H2S), also known as "sour gas", is not known to exist in this geographic area nor in any of the formations that will be encountered in this wellbore. Contingency planning for drilling in sour gas areas and formations is very specific and requires specialized training, certification, equipment and programs and does not apply to operations in this area. However, should H2S be encountered, trained and certified personnel, equipment and procedures would immediately be put in place to insure that all personnel and property would be protected.

SG Interests I, Ltd. will maintain first aid kits in its vehicles and site offices. Contractors maintain first aid kits in their vehicles and site facilities appropriate to their operations and in conformance with their internal policies. Site personnel with current training in first aid will be identified as such by hard hat markings or other means.

Hazardous Spills: All hazardous materials (reactive, flammable, corrosive and toxic) will be clearly labeled and stored in appropriate containers and within secondary containment. In the event fuel or lubricants are spilled, absorbent materials will be kept on location for immediate clean up. Service company vehicles carrying hazardous materials and performing work on the location, set secondary containment and provide absorbent materials for the immediate clean of such materials in the event of an accident or spill. Disposal of any such materials will be in compliance with COGCC Rules and Regulations as well as Federal and local requirements. In the event of an accident or spill off location, appropriate agencies would be notified including Emergency Dispatch, Colorado State Patrol, Fire Department, Hazardous Material Team (DERA), and any others deemed necessary (EPA, Division of Wildlife, USFS, etc.) by the circumstances of the accident/spill. Should spills or releases occur, they will be reported per COGCC Rules and Regulations 337 and 906 and as otherwise required. SG Interests I, Ltd has filed required SARA Title III reports with the Colorado Emergency Planning Commission, Colorado Department of Public Health & Environment, Denver, Colorado and with Region 10 Emergency Planning Committee, Gunnison, Colorado. MSDS (Material Safety Data Sheets) will be available on location as required.

Signage: A permanent sign will be posted at the well site. This sign will provide the name of the well, location, operator, and phone number on one side with driving directions on the other side. Signs will also be located as needed to provide direction to the well site during drilling and completion operations.

SG Interests I, Ltd. will reimburse emergency response service providers for costs incurred in connection with an emergency as required.

EMERGENCY PHONE NUMBERS

DELTA COUNTY EMERGENCY DISPATCH (970) 874-2015

Delta County Emergency Preparedness	(970) 874-2004 - office	Delta
Director & Coordinator, Rob Fiedler	(970) 255-7349 – home,	
Montrose Interagency Fire Dispatch	(970) 249-1010	Montrose
Gunnison County Emergency Dispatch	(970) 641-8000	Gunnison

FIRE

Cedaredge Fire Department	(970) 856-3717	Cedaredge
Hotchkiss Fire Department	(970) 872-3311	Hotchkiss
Paonia Fire Department	(970) 527-5775	Paonia
Ragged Mountain Fire Protection	(970) 929-5646	Somerset

AMBULANCE

North Fork Valley Ambulance Association	(970) 872-4303	Hotchkiss
Delta County Ambulance	(970) 874-9555	Delta
American Medical Response	(970) 242-2920	Grand Junction
Air Life @ St. Mary's Hospital	(970) 244-2551 (800) 332-4923	Grand Junction

HOSPITAL

Delta County Memorial Hospital	(970) 874-7681	Delta
Delta County Memorial Hospital - ER	(970) 874-2222	Delta
Grand Junction Community	(970) 242-0920	Grand Junction
Montrose Memorial	(970) 249-2211	Montrose
North Fork Medical Clinic	(970) 527-4103 (970) 872-3121	Paonia Hotchkiss
Gunnison Valley Hospital	(970) 641-2695	Gunnison
St. Mary's Hospital	(970) 244-2273	Grand Junction

POLICE

State Hwy Patrol	(970) 249-4392	Montrose
Delta Co. Sheriff	(970) 874-2000	Delta
Gunnison Co. Sheriff	(970) 641-1113	Gunnison

GOVERNING AGENCIES

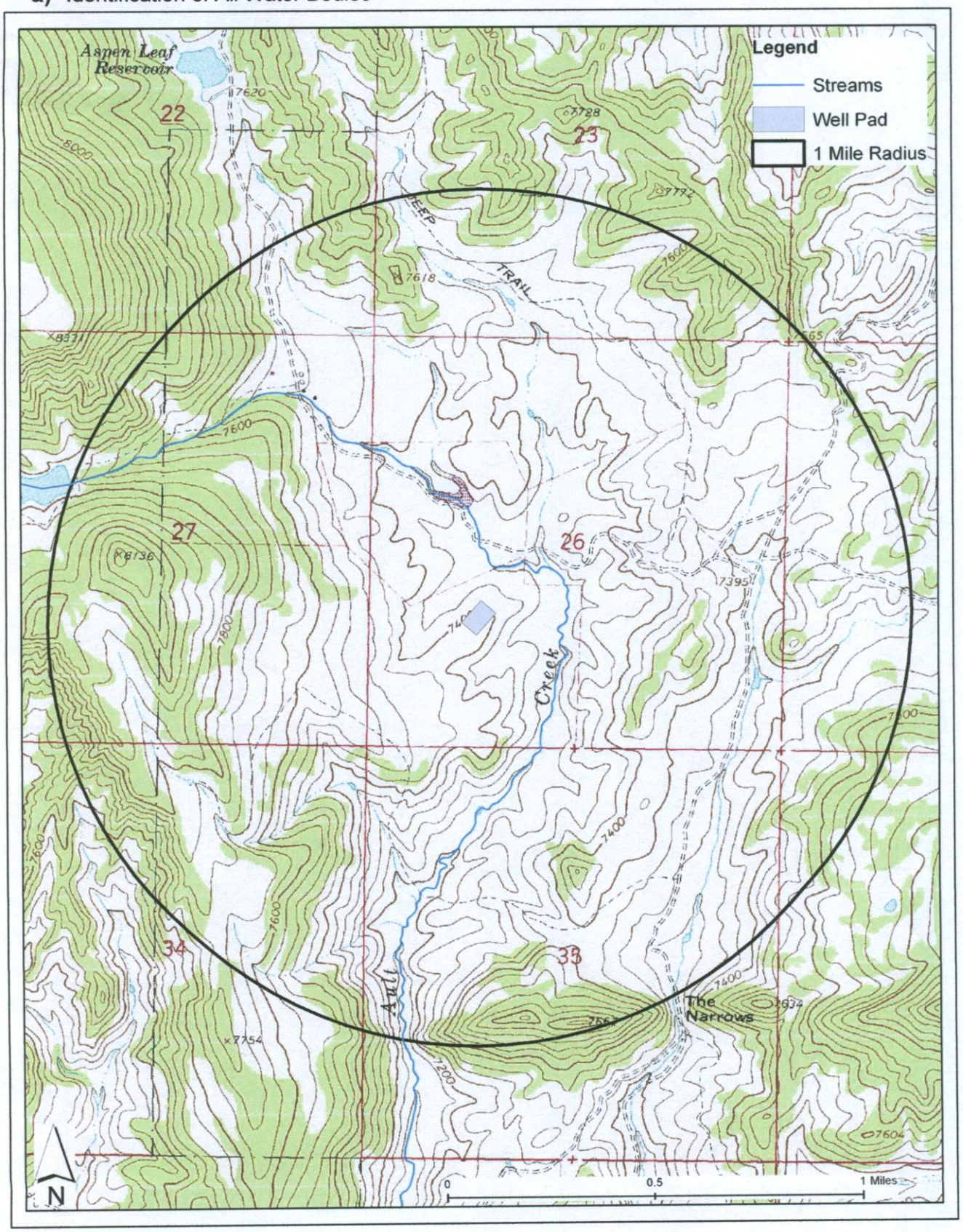
COGCC, David Neslin, Director	(303) 860-1435 (24 hour) (303) 894-2100 ext 5122	Denver
COGCC, Linda Spry O'Rourke, Environmental Protection Specialist	(970) 625-2497	Rifle
Bureau of Land Management, SW District Office	(970) 240-5300	Montrose
Forest Service, Levi Broyles, District Ranger	(970) 527-4131	Paonia
Pitt Construction, Spill Contractor	(970) 872-3536 (970) 260-2275	Hotchkiss

SG INTERESTS I

24-Hour Emergency	(866) 261-9766	
Dennis Beasley	(505) 947-3564 (970)929-5313	Cell Office
Eric Sanford	(970) 259-2759 (970) 252-0696	Cell Office

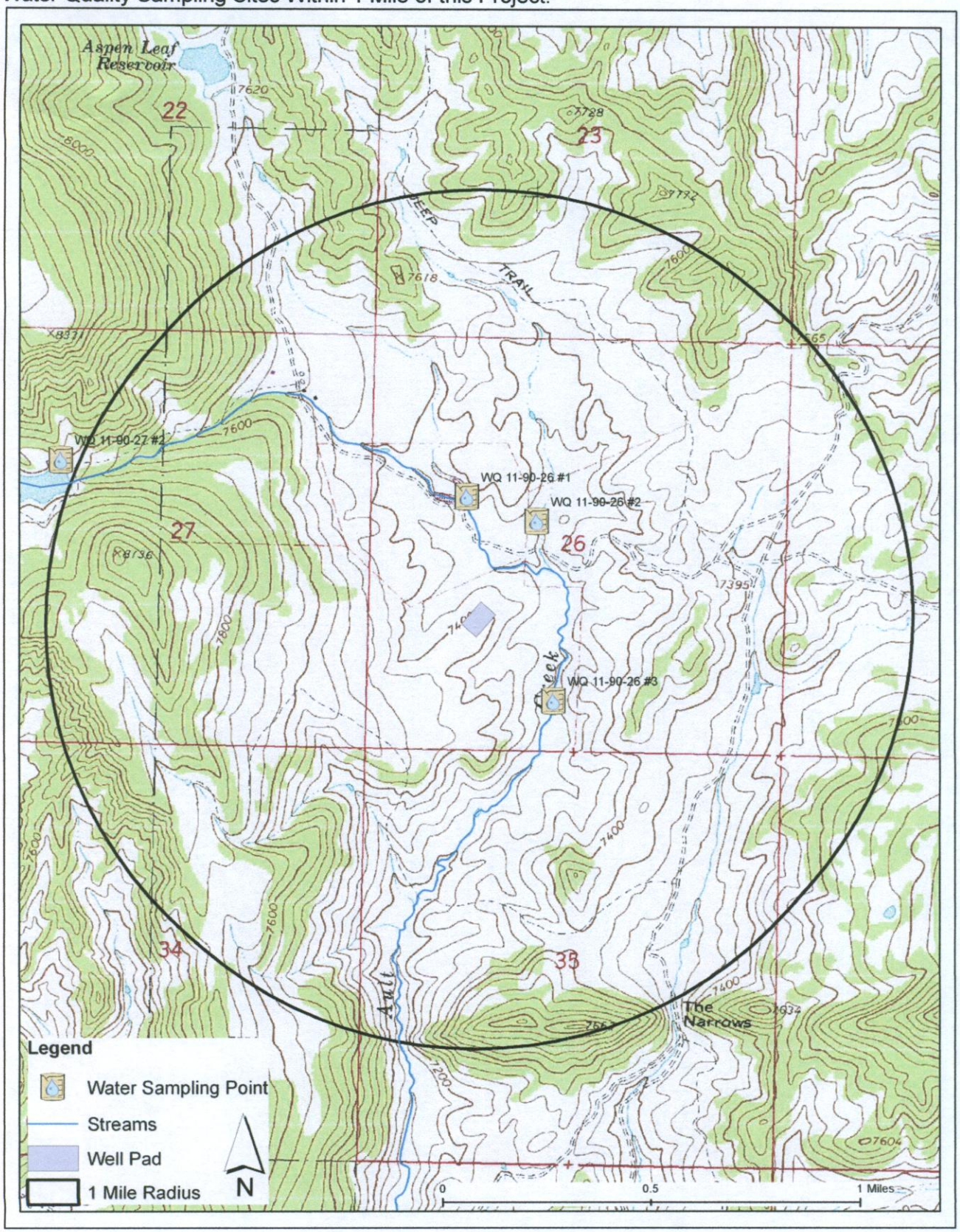
19) Water Quality Non-point Source Impacts

a) Identification of All Water Bodies



b) Description of Existing Water Quality

Water Quality Sampling Sites Within 1 Mile of this Project:



Three surface waters within the 1-mile radius were sampled for baseline water quality. Another sampling point just outside this one mile radius is also included in this analysis (WQ-11-90-27 #2). These results indicate the water is alkaline with higher than standard pH. In addition, the sample from point WQ 11-90-26 #3 contained fecal coliform bacteria (Appendix E).

Fecal coliform bacteria can be found in waters that have received agricultural runoff where livestock have been kept. These bacteria can also be found in waters that have been contaminated with human sewage that may be the result of inadequate or improperly functioning septic systems. Fecal coliform by themselves are not thought to have human health impacts, but their presence may indicate the presence of other, more virulent microorganisms such as those that cause hepatitis A, dysentery, and other types of infectious diseases (EPA, 5.11 Fecal Bacteria, http://water.epa.gov/type/rsl/monitoring/vms511.cfm). Levels of fecal coliform bacteria found in surface waters may vary according to environmental conditions such as rain events.

c) Non-Point Source Impacts to Water Quality

Non-point source pollution could result from construction of the well pad, use of the access road, and use of other existing roads. This pollution would be the result of erosion of disturbed soils and sedimentation of area water bodies.

d) Mitigation and Avoidance.

When practicable, SG Interests will try to avoid drilling under wet winter and early spring conditions in order to avoid erosion and sedimentation concerns. This will minimize the risk of muddy roads and transportation of mud on vehicles, disturbance to vegetation root systems due to saturated soils, soil compaction, homogenization of soil pedons and soil profiles etc.

SG has and will continue to improve, armor, and maintain roads to withstand heavy truck traffic in order to protect water quality. Use of roadbase (as opposed to silty native soils), soil tackifiers, and wetting agents combined with compaction produce a durable roadbase which will produce much less fine sediment when compared to existing unimproved roads.

SG Interests will conduct stormwater management activities according to their field-wide stormwater management plan and permit from Colorado Department of Public Health and Environment. SG Interests' stormwater inspector inspects BMPs and waterways following storms to improve and mitigate possible failure of BMPs. SG routinely "cleans up" mobilized sediments after intense storm events until revegetation is successful.

20) Cultural Survey

No cultural resource survey was conducted for this project. Cultural resource surveys were declined by the landowner (Appendix F).

21) Drainage and Erosion Control Plan

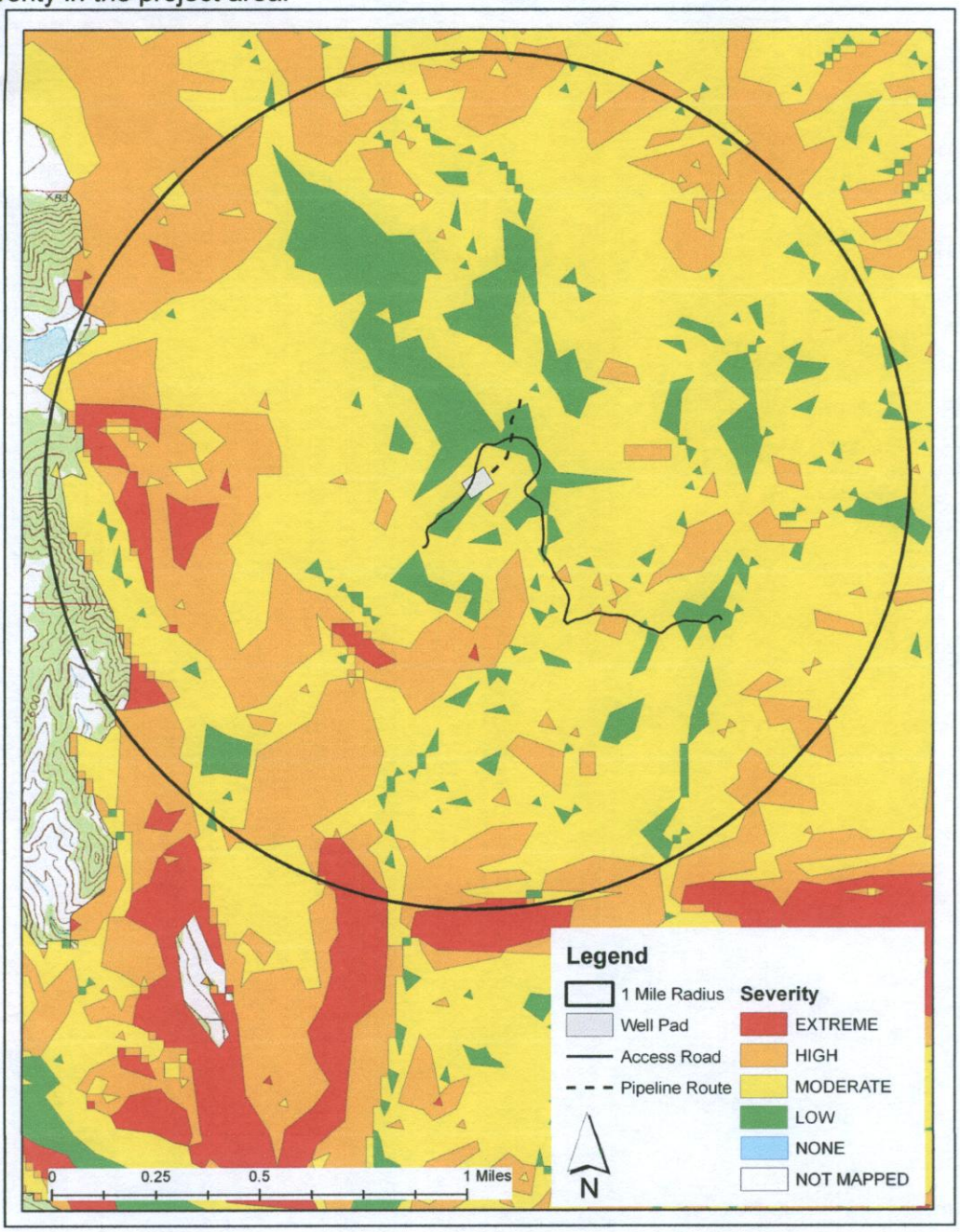
SG Interests has in place a stormwater discharge permit from Colorado Department of Public Health and Environment (#COR-039711, provided previously). A Stormwater Management Plan has been written for this permit and site specific drainage and erosion control measures will be added into the master plan for the Hughes 11-90-26 well pad. The drainage and erosion control measures put in place to stabilize the well pad and access road will be maintained.

22) Wildfire Hazards

The planned gas well pad and pipeline are located in an area mapped as "low" and "moderate" severity for wildfire. The existing access road passes through areas mapped as "low" and "moderate", with a very small patch of ground mapped as "high". If flaring is required for this well, areas around the flare will be cleared of all vegetation to reduce fire danger. If required or deemed necessary due to dry conditions, separate firefighting equipment consisting of 400 bbls of fresh water, a high pressure pump, and 300' of fire hose will be kept in the immediate vicinity. See the Fire Prevention

and Protection section in the Emergency Response Plan above for more detail (Item 18). See the map below for location of the project relative to mapped wild fire hazards in the area.

Wildfire severity in the project area:



23) Geologic Hazards

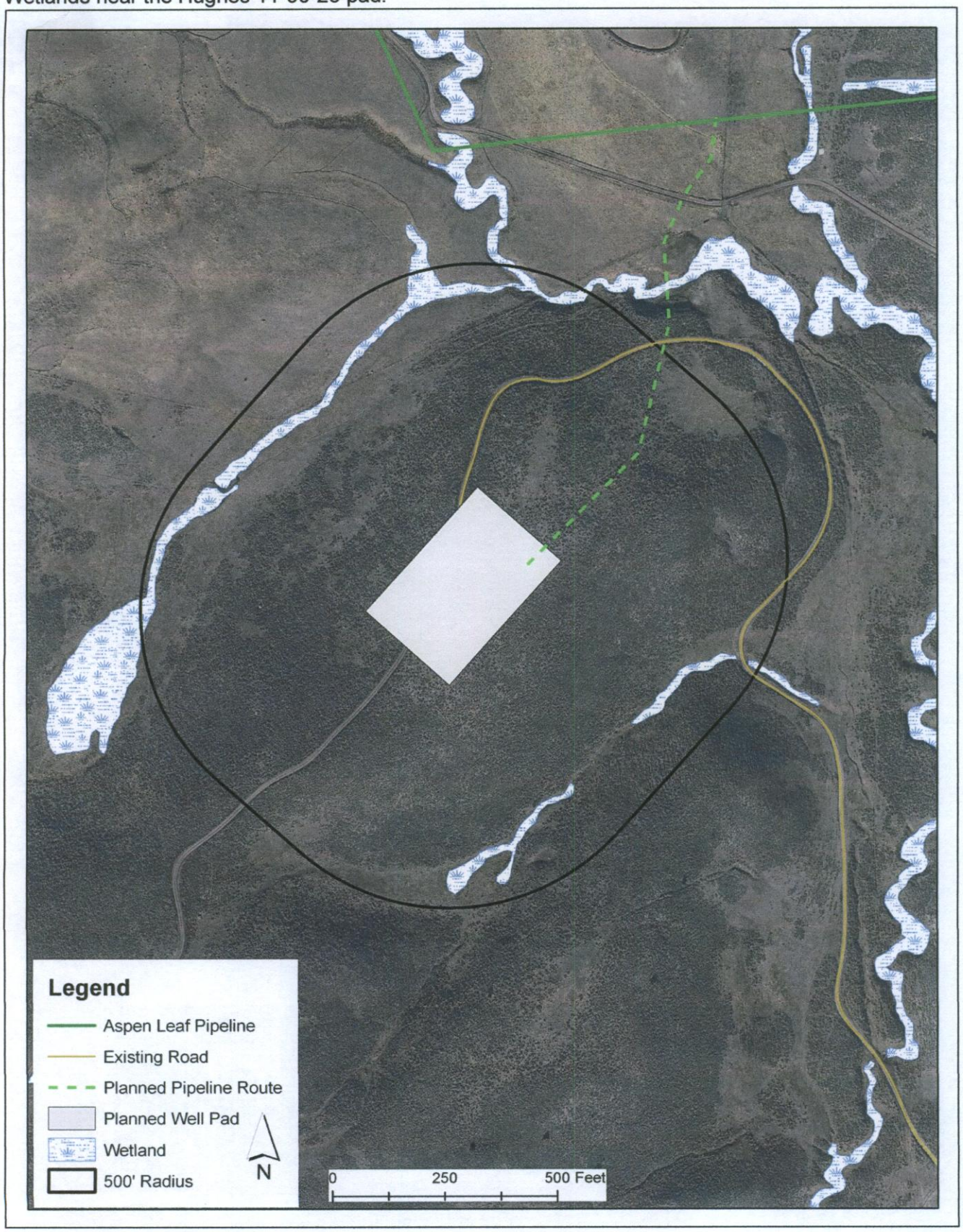
The subject area has not been mapped for geologic hazards by either Gunnison County or the USDA Forest Service. No geologic hazards are known from this project area.

24) Existing and Future Land Use

The parcel is currently used for livestock grazing and for natural gas development. The future use of this parcel, as far as can be determined, is as a working livestock ranch. At the conclusion of the well pad's use, all areas disturbed for use in gas production will be recontoured and reclaimed as per the requirements of the Surface Use Agreement and/or landowner direction.

25) Technical Infeasibility Waiver

The existing two-track access road will be upgraded in order to support the required traffic. This road crosses drainages in three areas using culverts. It is likely that these culverts will need to be replaced when the access road is upgraded. The pipeline route will cross one wetland between the well pad and the existing gathering system line. The drainage runs between the well pad and the existing pipeline and cannot be avoided. The well pad does not directly impact any wetland. The pad is approximately 360' from a wetland to the south and approximately 390' from a wetland to the north. Distances from wetlands were maximized in the planning process for this well. Waterbody setbacks are regulated by the Colorado Oil and Gas Conservation Commission, and thus Gunnison County is preempted from regulating setbacks of oil and gas locations from waterbodies in a manner more restrictive than the state. Without waiver of any legal right or acknowledgment of Gunnison County's authority to regulate waterbody setbacks for oil and gas operations in a manner more restrictive than the state, SG submits a request for a Technical Infeasibility Waiver under Gunnison County Temporary Regulations for Oil and Gas Operations, Section 1-107 (P)(2). Steep topography prevents SG from locating the pad further from wetlands and simultaneously locating the well pad in a location that maximizes the mineral owner/lessor's mineral property rights. Further, coal bed methane well locations cannot be moved significantly from their planned locations and still access the target minerals.

Thus, in the alternative and without waiver of legal rights, SG Interests requests a waiver from Gunnison County Temporary Regulations for Oil and Gas Operations 1-107 H Waterbody Setbacks under Section 1-107 (P)(2), No Technology Available. There is no economical technology commercially available to deliver the natural gas or the produced water to the gathering system pipelines other than through the use of the planned pipelines and access road and steep topography prevents SG from locating the well pad further from wetlands and simultaneously locating the well pad in a location that maximizes the mineral owner/lessor's mineral property rights. A waiver under Gunnison County Temporary Regulations for Oil and Gas Operations, Section 1-107 (P)(2), will not cause injury or damage to the owner or occupant of adjacent land(s) or to the environment.

Wetlands near the Hughes 11-90-26 pad: