



February 22, 2016

Bureau of Land Management
Moab Field Office
Attn: Beth Ransel- Field Office Manager
82 East Dogwood
Moab, Utah 84532

RE: Fidelity Response to BLM Preliminary Alternatives, West Fertilizer Exploratory Area

Ms. Ransel:

Fidelity Exploration & Production Co. (Fidelity) appreciates this opportunity to provide review of the preliminary alternatives developed by the Bureau of Land Management – Moab Field Office (BLM) for the West Fertilizer Exploratory Area. Fidelity respectfully and formally requests that this response letter be included in the administrative record for this BLM action.

As you are aware, Fidelity has provided a Master Exploration Plan and formal proposed action for its exploration and development of the West Fertilizer area in and near its Cane Creek Unit. The proposal requests to construct 15 new well pads plus an additional 16th pad near the West Fertilizer area (Map1). The exploratory project would initially disturb approximately 190 acres over a 32,000 acre area (an approximate 0.6% disturbance footprint) to advance up to 48 horizontal wells. The wells are strategically placed on optimized multi-well pad locations to target multiple geologic regimes and fracture orientation models within the structurally complex Paradox Basin.

Fidelity's proposed Exploration Plan was meticulously designed to explore an approximate 50 square-mile area. Well pad locations were chosen to: (1) optimize Fidelity's opportunities for drilling productive wells by utilizing the most current available geologic data and state-of-the-art technical interpretation tools; and (2) be consistent with the management prescriptions approved by the Moab 2008 Resource Management Plan, which would limit impacts to the area's unique natural resources

Fidelity acquired the affected mineral leases in 2006. Fidelity's proprietary structural data models have been developed over nine years of geophysical, geological and reservoir engineering analyses. These analyses provided the basis for pad placement in the West Fertilizer area and the means to avoid inefficient oil recovery and prevention of resource waste. Fidelity's proposal is a result of a deliberate and iterative process. Fidelity's choice of locations were based on state-of-the-art interpretation techniques and substantiable fact, while minimizing

surface resource/environmental issues without unduly compromising Fidelity's ability to fulfill the terms of its mineral lease. Further, Fidelity has spent approximately \$700,000 in capital expenditures for pre-planning efforts, obtaining appropriate natural resource surveys, civil facility surveys, and NEPA specialist support to advance this proposed 16 pad program, which have been field-evaluated by BLM with Fidelity on September 11-12, 2012, and March 26-28, 2014, August 14, 2015, and October 14, 2015. Other field visits were conducted by the BLM with Fidelity participation. The unreasonable amount of time the approval process for this proposed action has taken is very concerning to Fidelity.

BLM met with Fidelity on December 3, 2015 and disclosed that preliminary alternatives to the Fidelity-proposed action were being developed to address issues identified by the public and resource specialists in the Moab Field Office during the public scoping period. Moab resource specialists had multiple opportunities to view Fidelity-proposed locations in a field setting during 2012- 2015 and did not indicate to Fidelity the need for anything more than slight adjustments to the proposed well pad locations to minimize probable impacts. The well pad relocations presented in the attached BLM preliminary alternative were not discussed or even mentioned as being necessary to address other possible impacts.

It is BLM's obligation that only "reasonable" alternatives be considered; per H-1790- NEPA Handbook "Reasonable alternatives include those that are *practical or feasible* from the technical and economic standpoint and using common sense,..." Fidelity strongly maintains that the preliminary alternative (Map 2) is technically impractical because it totally discounts the nine years of professional effort by a dedicated staff supporting the choice of the proposed well pad locations; uneconomic because the alternate locations provide no reasoned technical basis for likely production success; and wholly contrary to the intent of the Mineral Leasing Act (MLA) and issuance of valid leases. The MLA was enacted by Congress to promote the orderly development of mineral resources and to provide the public with a reasonable return. Given the development purpose of the MLA, the imposition of significant surface-use restrictions by replacing the proposed well pad locations with entirely and substantially different well pad locations violates Congress' intent in enacting the MLA. The BLM must administer the MLA so as to provide some incentive for and to promote the development of oil and gas deposits in its leased federal lands through private enterprise. Consideration of the alternative presented by the Moab BLM field office as viable removes the possibility of successful production in an area that has shown limited and unpredictable production success in the past. The alternative removes the incentive for private development of valid leases and, in practice, constitutes a denial of the proposed development of the mineral resource.

Fidelity strongly suggests that, should BLM ultimately include this alternative in the NEPA document, an explanation be provided in the NEPA analysis that the BLM Manager has elected to conceptually analyze this alternative only as a tool to address public scoping comments and assist in possible future decision-making as it may relate to land use planning decisions, but is not a viable alternative to the proposed project and a decision that incorporates this alternative is not viable because its choice would constitute a minerals taking.

General Comments to BLM's Preliminary Alternative

As requested, Fidelity will address individual comments for each preliminary alternative well pad location. Immediately below are general Fidelity comments that can be applied to the BLM proposal as a whole, which we believe substantiate the regulatory, technical and economic deficiencies of the BLM proposed alternative.

- Fidelity's sixteen proposed West Fertilizer pads are strategically placed to directionally target multiple geologic regimes and fracture orientations from a small set of surface locations. BLM's NEPA guidance (H-1790- NEPA Handbook) indicates that only "reasonable" alternatives will be considered; the suggested BLM alternative, which directly compromises Fidelity's knowledge of the geology and geophysics of the area, and expertise in reservoir engineering, and drilling and completion techniques, cannot be considered reasonable and could impact the technical and economic viability of Fidelity's entire proposal.
- In 43 C.F.R. 3101.1-2 (1991), the BLM emphasizes that "reasonable measures" must be consistent with lease rights granted to the lessee and any impact on the viability of the lessee's proposed operations must be considered. A BLM imposed restriction or modification which renders the lessee's operations economically or technically invariable is not "reasonable" under Section 3101.1-2. BLM's preliminary alternative has the strong potential to add unverified and costly infrastructure and increase lateral lengths beyond technical and economic achievability.
- Technically and economically, Fidelity is generally limited to horizontal lateral lengths up to one-mile (5280'), as reflected in the APDs submitted under the West Fertilizer EA. Typically we do not reach this limit due to geologic complexity and/or cost limitations.
- BLM's "200-meter rule" provides that post-leasing surface-use restrictions are deemed consistent with lease rights provided they do not require relocation of proposed operations more than 200 meters. However, even a surface-use restriction that falls within the 200-meter rule will not be upheld if determined arbitrary and capricious. Ultimately the basis for any modification of a proponent's proposal must be substantiated, justified and clearly documented in BLM's administrative record. The BLM has not provided any substantiation for these changes and cannot supersede management guidance, currently the 2008 Moab RMP. Only an RMP amendment can change this management guidance.
- Under the Mineral Leasing Act, Section 16; oil and gas leased lands shall be developed using reasonable precautions to prevent waste of oil or gas, and that operations must be conducted for the most economical and efficient recovery. BLM's preliminary alternative would not promote efficient recovery of these resources by adding the significant cost and disturbance of unverified offsite facilities, moving to well locations that would not

- efficiently develop the area, and by moving or collocating well facilities which could extend lateral lengths beyond technical and economic viability. In fact, choice of the preliminary alternative may entirely prevent recovery of the mineral resource.
- BLM's clearly stated intent to recognize expanded Wilderness Character (WC) areas in West Fertilizer would restrict Fidelity's proposed pad locations. Beyond general discussions, nothing associated with expanding WC areas has been called out or put into writing by BLM prior to this preliminary alternative. According to BLM, this unsupported WC designation is partly based on West Fertilizer EA scoping comments submitted by anti-development conservation groups and subsequent recently conducted inventories. Fidelity's proposed 16 pads avoid the WC areas designated by the Moab 2008 RMP; for which BLM made a conscious decision in the RMP to not manage as WC areas. The pending land use documents, which include the Master Leasing Plan, Draft Amendments to the Moab and Monticello RMP, and Draft EIS for the amended RMP, do not address reconsideration of the lands designated as WC areas in the 2008 RMP. Fidelity has respected appropriate buffer offsets from the canyon rims in West Fertilizer and much of the canyon rim area is dotted with dispersed camping sites, established 2-track access roads, and heavy livestock grazing activities. Unless BLM can provide appropriate documentation that these areas have been formally evaluated and substantiated and recognized as WC under current BLM guidance, including resource management plan land use prescriptions, Fidelity maintains that BLM cannot preclude conscientious oil and gas development in these area, and that any analysis of well pads moved from the WC area in the West Fertilizer NEPA document disclose that the BLM does not have the current authorization to forcibly relocate such locations solely on the basis of WC.
 - BLM provided recommended interim reclamation (IR) proposals for all 16 of Fidelity's proposed well pads. Fidelity has consciously implemented the exploration of an extremely large area using a very small number of reasonably-sized well pads; an action that should be considered as viable reclamation mitigation in itself. BLM's aggressive IR recommendations would require Fidelity to significantly reduce pad size and relocate infrastructure following initial well completion. These IR conditions are not appropriate for the following reasons.
 - The excessive amount of IR requested by BLM would not allow the drilling of subsequent wells. The entire success of Fidelity's proposal is to delay IR and develop multiple wells on each pad.
 - BLM's IR proposals require that some pad facility infrastructure be relocated during IR. Fidelity's proposal assumes that the pad infrastructure is designed and initially located for long-term production, with IR occurring post-drilling within areas of the pad not necessary for long-term operations. Facility relocation, including removal and replacement of underground flow-lines, is an expensive and inefficient proposal that Fidelity will not agree to.
 - Fidelity and industry standard is to place the majority of operational facilities on the cut portion of a well pad, providing a stable base for

- storage, treatment and separation equipment. Although this can reduce the area available for IR, stable equipment and safe distances between open-flame facilities is paramount to safe operations and the limitation of operational incidents. BLM's consistent message to focus on reclaimable area versus Fidelity's operational experience and safety is inappropriate.
- Fidelity has minimum equipment offsets and orientations needed to maintain safe operation conditions. Although some older well locations may not exactly reflect these safety offsets, all future proposed locations will be required to meet safe design conditions as determined by Fidelity. It is inappropriate for BLM to dictate to Fidelity how to design and safely operate pad facilities.
- BLM's preliminary alternative requests well pad relocations and the co-locating of two or more proposed pads to a single pad location. The alternative also proposes up to four offsite centralized production facilities to service multiple wells. BLM's preliminary alternative is based on suppositions derived solely from a map of the surface and misinformed interpretation of unproven theories that totally ignore all hard-gained knowledge of the subsurface.
 - Moving any one surface location to respond solely to surface concerns would diminish the likelihood of drilling not just one, but three potentially productive wells on a pad. In moving 13 of 16 proposed pad locations under this preliminary alternative, BLM precludes evaluation of the field as a whole.
 - Pad locations are based on our best science and experience available. Despite our expertise in locating these pads, It is not common sense to assume that every location will be productive, which is the basis for BLM's preliminary alternative. This is still a very exploratory area and BLM's preliminary alternative assumes well success at each proposed location, a poor planning assumption in consideration of past exploration and development history of the area.
 - Centralized production facilities are appropriate for a development field but not an exploratory area. Offsite facilities need to be strategically placed to gather productive wells. The productivity of each proposed well and the actual drilling order of each pad is uncertain, and therefore it is impossible to appropriately preemptively locate centralized facilities. It is inappropriate to include centralized facilities as a viable alternative.
 - Centralized facility gathering lines are not conducive to the area's crude oil chemical properties. Paradox crude oil contains significant concentrations of paraffin and salt. Continuous heating or treatment is required to keep crude from solidifying along gathering routes.

- Use of glycol heating systems would result in extreme environmental liability to Fidelity. Fidelity cannot in good conscious utilize a highly leak-prone, toxic substance, travelling through piping overland or underground for long distances for the purpose of paraffin mitigation in an area known for high recreational use.
- BLM's intent to effectively manage the West Fertilizer area as VRM Class II is not substantiated by the 2008 RMP and has the potential to restrict Fidelity's proposed pad locations. Although BLM inventoried the area as VRM Class II prior to the 2008 RMP revision, the 2008 RMP clearly demonstrates that BLM identifies the area as Class III and chose to manage the area as Class III. Fidelity's proposed 16 pads clearly do not exceed Class III objectives, as designated under the Moab 2008 RMP. There have been no changes in management guidance and no formal decision is pending on managing these lands as VRM II including: the Master Leasing Plan, Draft Amendments to the Moab and Monticello RMP, or Draft EIS for the amended RMP. Unless BLM can provide documentation that these areas have been formally evaluated, substantiated and recognized as VRM II as a result of an appropriate land use decision, Fidelity maintains that BLM cannot regulate oil and gas development to Class II standards.

Comments Specific to Pad Relocation per BLM's Preliminary Alternative

An evaluation of each of BLM's preliminary alternative well site proposals (Map 2) is provided below. Again, generalized comments provided above should be considered along with comments provided for each alternate well site. Specific information for each relocated pad was provided in BLM's Preliminary Alternatives Tables 1 and 2.

CCU 5-1, 5-2 & 9-1 (1 & 2)- Co-location of three proposed wells to a single pad location would eliminate Fidelity's directional strategy for multiple wells from each of the three Fidelity proposed well pads targeting a specific fracture orientation. The horizontal distance required to reach Fidelity's geologic targets from this centralized location greatly exceed technical and economic limits. BLM's proposal of a multi-pad offsite tank-battery facility approximately 4-miles to the East would require the uneconomic addition of oil gathering pipeline costs and line heaters every 100-200 feet (or between 100-200 heating units) for long-term oil collection.

Finally, Fidelity has committed significant capital for pre-planning efforts, APD compilation and support documents, natural resource surveys, civil survey and well pad plats, horizontal drilling plans, VRM simulation and NEPA specialist support to permit these locations, all of which were field-verified during BLM on sites.

CCU 21-1-25-18 (1)- BLM's preliminary alternative recommends a slight move of the well location to presumably address visual impacts. Although Fidelity may consider a slight, justifiable move of this location, there has been no substantiation or rationale provided by BLM. The intent to recognize the West Fertilizer area as VRM Class II is not substantiated and would not provide justification in itself to affect Fidelity's proposed pad location.

Again, Fidelity has committed significant capital for pre-planning efforts, APD compilation and support documents, natural resource surveys, civil survey, horizontal drilling plans and well pad plats, VRM simulation and NEPA specialist support to permit this location, which was field-verified during BLM on sites. This slight well adjustment would cost Fidelity significant time and effort to revise the location with little tangible benefit.

CCU 21-1-25-18 (2 & 3)- BLM recommends a pad relocation approximately 1-mile to the west which would eliminate Fidelity's directional strategy for multiple wells from this location targeting specific geologic structure and fracture orientations to the east and south. The horizontal distance required to reach Fidelity's geologic targets from this revised location exceed technical and economic limits. BLM's intent to avoid unsubstantiated WC areas to the east is unjustified and unwarranted considering BLM's decision not to manage WC areas for preservation of this resource. Fidelity has committed significant time, effort and cost in permitting this BLM verified location.

CCU 6-1 & 7-1 - Per BLM's preliminary alternative, pad relocation of the CCU 6-1 approximately 1 ½-miles to the southwest (independently) or co-located with the CCU 7-1 approximately 1 ½-miles to the south would eliminate Fidelity's directional strategy for multiple wells from Fidelity's proposed CCU 6-1 location targeting specific geologic structure and fracture orientations to the northwest, southwest and southeast. The horizontal distance required to reach Fidelity's geologic targets from the revised location exceed technical and economic limits and drilling direction is contrary to Fidelity-determined fracture patterns.

BLM's proposal to relocate the CCU 7-1 within an abandoned well pad approximately 1/4-mile to the northwest has not been justified. Fidelity's proposed location was chosen to eliminate any line-of-site view to the Jug Rock rock-art area. Use of an existing disturbance may be appropriate and Fidelity may be open to discuss moving this location should BLM provide rational and justification for the move. Regardless, Fidelity has committed significant time, effort and cost in permitting this BLM verified location.

CCU 13-1-25-18- Pad relocation approximately 1-mile to the north would eliminate Fidelity's directional strategy for multiple wells from this location targeting specific geologic structure and fracture orientations to the southwest and northwest. The horizontal distance required to reach Fidelity's geologic targets from this revised location exceed technical and economic limits. BLM's intent to avoid unsubstantiated WC areas south of Spring Canyon Road is unjustified and unwarranted considering BLM's decision not to manage WC areas for preservation of this resource. Fidelity has committed significant time, effort and cost in permitting this BLM verified location.

The alternate access road proposed by BLM (using an existing 2-track) was discussed during the BLM field onsite and was initially eliminated as an option due to potential archeological impacts. Fidelity may be open to discuss moving access to this established 2-track location should BLM provide rational and justification for the move.

Again, Fidelity has committed significant capital for pre-planning efforts, APD compilation and support documents, natural resource surveys, civil survey and well pad plats, horizontal drilling plans, VRM simulation and NEPA specialist support to permit this location, all of which were field-verified during BLM on sites.

CCU 17-1-25-19- BLM's preliminary alternative recommends a slight move of the well location approximately 100-feet to the northeast. Although Fidelity may consider a justifiable move of this location, there has been no substantiation or rational provided by BLM.

The alternate access road proposed by BLM (using an existing 2-track) was discussed during the BLM field onsite and was initially eliminated as an option due to potential archeological impacts. Fidelity may be open to discuss moving access to this location should BLM provide rational and justification for the move.

Again, Fidelity has committed significant capital for pre-planning efforts, APD compilation and support documents, natural resource surveys, civil survey, horizontal drilling plans and well pad plats, VRM simulation and NEPA specialist support to permit this location, which was field-verified during BLM on sites. This slight well adjustment would cost Fidelity significant time and effort to revise the location with little tangible benefit.

CCU 21-1-25-19- BLM's preliminary alternative recommends a move of the well location approximately 600-feet to the southwest. Fidelity's proposed location was chosen after several moves to the west by BLM's resource team during several BLM field onsites (March 2014 and August 2015). The relocation by BLM was to reduce visual impacts to Highway 313 (a VRM Class II buffer) and was field verified by BLM. Also, the VRM simulation of this well pad developed by a company accomplished in professional visual simulations strongly demonstrates minimal visual impacts from the current pad location. Fidelity may be open to discuss moving this location should BLM provide rational and justification for the move.

As with every BLM proposed location, Fidelity has committed significant capital for pre-planning efforts, APD compilation and support documents, natural resource surveys, civil survey and well pad plats, horizontal drilling plans, VRM simulation and NEPA specialist support to permit this location, all of which were field-verified during BLM on sites.

CCU 14-1-25-19 (1 & 2)- Pad relocation approximately ½- mile to the west or 1 ½- mile to the southwest would eliminate Fidelity's directional strategy for multiple wells from this location targeting specific geologic structure and fracture orientations to the west and northwest. The horizontal distance required to reach Fidelity's geologic targets from this revised location exceed technical and economic limits.

This pad location was adjusted and field-verified by BLM on several site visits (March 2014 and August 2015). BLM has not provided any rational or justification for this significant move.

CCU 25-1-25-19- BLM's preliminary alternative recommends a move of the well location approximately ¼-mile to the northeast. Fidelity's proposed location was chosen after several location adjustments by BLM's resource team during several BLM field onsites (June 2012, September 2012, March 2014 and August 2014). The preliminary alternative relocation by BLM is apparently to reduce visual impacts from Gemini Bridges Road. Fidelity's VRM simulation of the location, developed by a company accomplished in professional visual simulations, strongly demonstrates minimal visual impacts to Gemini Bridges from the current pad location. Pad relocation would compromise Fidelity's directional strategy for multiple wells from this location targeting specific geologic structure and fracture orientations to the west, northwest and southeast.

BLM's proposal of a multi-pad offsite tank-battery facility located on the 26 pad approximately two miles to the west would require the uneconomic addition of oil gathering pipeline costs and line heaters every 100-200 feet (or between 50-100 heating units) for long-term oil collection.

Fidelity has committed significant capital for pre-planning efforts at this location including, APD compilation and support documents, multiple natural resource surveys, civil survey and well pad plats, horizontal drilling plans, VRM simulation and NEPA specialist support to permit this location, all of which were field-verified during BLM on sites.

CCU 19-1 & 30-1 - Per BLM's preliminary alternative, pad relocation of the CCU 19-1 approximately ½-mile to the east would eliminate Fidelity's directional strategy for multiple wells from Fidelity's proposed location targeting specific geologic structure and fracture orientations to the northwest and northeast. BLM's intent to avoid unsubstantiated WC areas south of Hell Roaring Canyon is unjustified and unwarranted considering BLM's decision not to manage WC areas for preservation of this resource. Further, the horizontal distance required to reach Fidelity's geologic targets from the revised location exceed technical and economic limits and the drilling direction is contrary to Fidelity-determined fracture patterns. Access road construction to the alternate location would be extremely expensive, cause unnecessary disturbance and encroach on buffer offsets from the Hell Roaring Canyon rim and wildlife habitat buffers. Fidelity's proposed location utilizes existing 2-track disturbance for road access.

BLM also proposes an alternative with a slight move of the CCU 19-1 pad approximately 150 feet to the north and co-locating the CCU 30-1 well on the same pad. Although Fidelity may consider a justifiable move of this location, there has been no substantiation or rationale provided by BLM. Relocation of the CCU 30-1 pad would eliminate Fidelity's directional strategy for multiple wells from Fidelity's proposed location targeting specific geologic structure and fracture orientations to the northwest and northeast. The horizontal distance required to reach Fidelity's geologic targets from the revised location exceed technical and economic limits and drilling direction is contrary to Fidelity-determined fracture patterns.

For either preliminary alternative, Fidelity has committed significant capital for pre-planning efforts at these locations including APD compilation and support documents, natural resource surveys, civil survey and well pad plats, horizontal drilling plans, VRM simulation and NEPA specialist

support to permit this location, all of which were field-verified during BLM on sites. Even a slight well adjustment would cost Fidelity significant time and effort to revise the location with little tangible benefit.

CCU 29-1 & 30-1 - Per BLM's preliminary alternative, pad relocation of the CCU 19-1 co-located with the CCU 30-1 would eliminate Fidelity's directional strategy for multiple wells from both of the Fidelity proposed locations targeting specific geologic structure and fracture orientations. The horizontal distance required to reach Fidelity's geologic targets from the revised location exceed technical and economic limits and drilling direction is contrary to Fidelity-determined fracture patterns. BLM's intent to avoid unsubstantiated WC areas south of Hell Roaring Canyon is unjustified and unwarranted considering BLM's decision not to manage WC areas for preservation of this resource.

Thank you for the opportunity to provide comments. Fidelity began the planning process for West Fertilizer development nearly three years ago and it is Fidelity's experience that Moab BLM is utilizing a prolonged NEPA process that perpetuates the delay of rightful development on federal lands. In response to BLM's preliminary alternative, Fidelity has copied U.S. legislative representatives, the State BLM office, and local and state government officials. Feel free to contact me directly if you have any questions or need additional information.

Best regards,

A handwritten signature in blue ink, appearing to read "Michael J. Keller".

Michael J. Keller, P.G.
Environmental, Health and Safety Manager

Cc:

U.S. Senate- Orrin Hatch

U.S. Senate- Mike Lee

U.S. Representative Jason Chaffetz

U.S. Representative Rob Bishop

Kent Hoffman- BLM Deputy State Director

Lance Porter- BLM Moab District Manager

Cody Stewart- Utah Governor Herbert's Policy Director

John Rogers- Utah DOGM- Associate Director

Lavonne Garrison- Utah Trust Lands Division- Assistant Director Oil and Gas

Lynn Jackson- Grand County Council

Kathleen Sgamma- Western Energy Alliance

Fidelity's West Fertilizer 16-Pad Oil and Gas Project
Preliminary Alternatives

Table 1: Alternative Well Sites (Approximate Location)

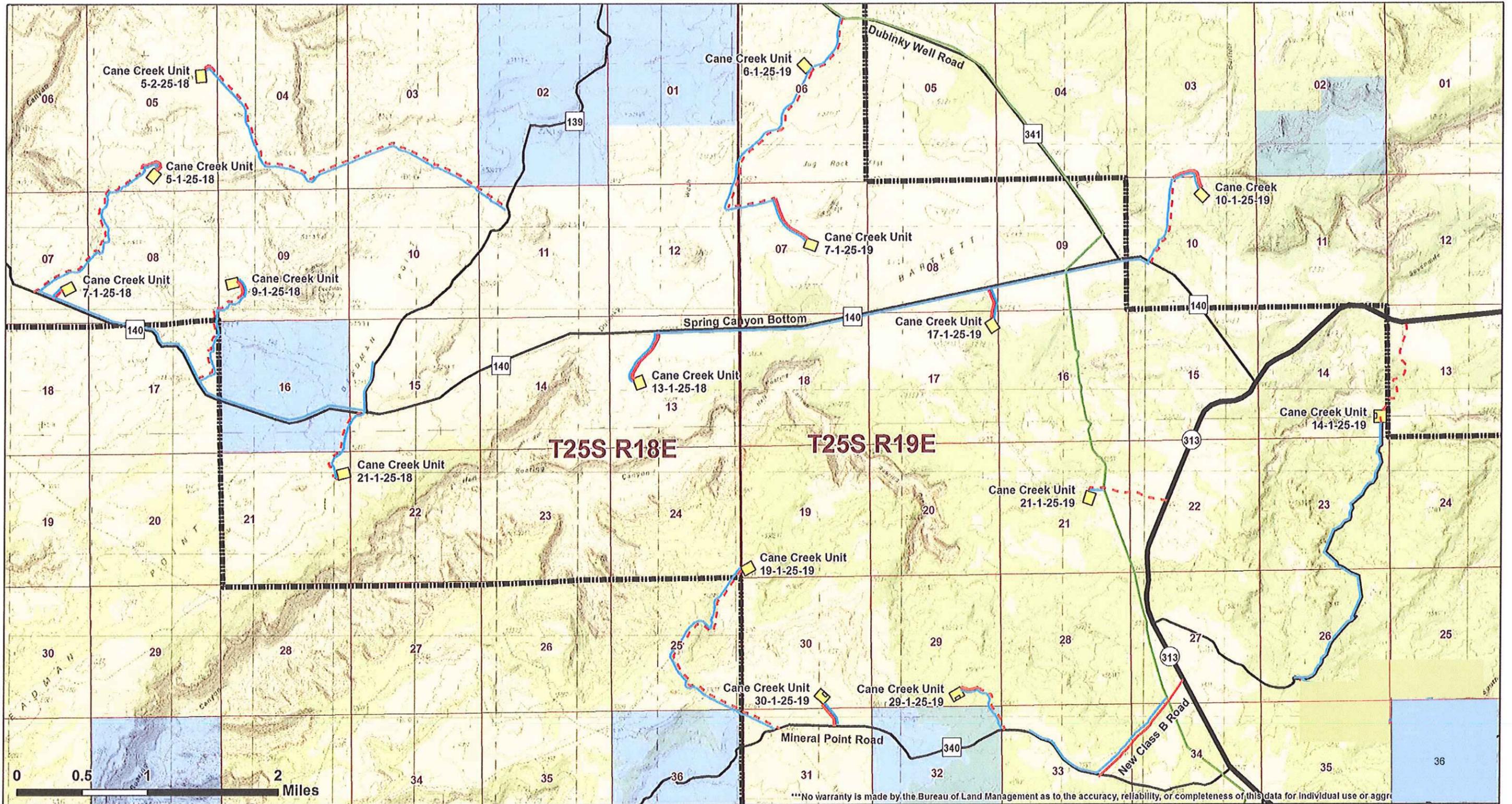
Well Site	Footage	Section	Township (S)	Range (E)	Notes
CCU 5-1, 5-2 & 9-1 (1)	3580 FSL & 375 FWL	4	25	18	<i>~0.25 miles southeast of proposed CCU 5-2</i>
CCU 5-1, 5-2, & 9-1 (2)	1250 FSL & 1390 FWL	4	25	18	<i>~0.75 miles southeast of proposed CCU 5-2</i>
CCU 21-1-25-18 (1)	630 FNL & 315 FEL	21	25	18	<i>Shift ~275' north from proposed well site</i>
CCU 21-1-25-18 (2)	300 FNL & 1525 FWL	21	25	18	<i>Located south of SWD well</i>
CCU 21-1-25-18 (3)	<i>Any other location outside of the LWC area</i>				
CCU 6-1-25-19	390 FSL & 560 FEL	1	25	18	<i>~1 mile SW of proposed well site</i>
CCU 7-1-25-19	1570 FNL & 2040 FWL	7	25	19	<i>Upon an abandoned well site</i>
CCU 6-1 & 7-1	15 FSL & 2095 FWL 15 FNL & 2100 FWL	6 7	25	19	<i>~0.5 miles NW of proposed CCU 7-1-25-19</i>
CCU 13-1-25-18 (1)	335 FSL & 970 FWL	12	25	18	<i>Located north of Spring Canyon Bottom Rd.</i>
CCU 13-1-25-18 (2)	<i>Any other location outside of the LWC area</i>				
CCU 17-1-25-19	590 FNL & 190 FEL	17	25	19	<i>Shift ~100' northeast from proposed well site</i>
CCU 21-1-25-19	2580 FNL & 2160 FEL	21	25	19	<i>Shift ~600' southwest from proposed well site</i>
CCU 14-1-25-19 (1)	60 FNL & 2440 FWL	23	25	19	<i>~0.5 miles southwest of proposed well site</i>

Fidelity's West Fertilizer 16-Pad Oil and Gas Project
Preliminary Alternatives

CCU 14-1-25-19 (2)	1600 FSL & 1550 FWL	15	25	19	<i>~1.5 miles west of proposed well site</i>
CCU 25-1-25-19	1960 FSL & 1560 FEL	25	25	19	<i>~0.25 miles northeast of proposed well site</i>
CCU 19-1 & 30-1	60 FSL & 295 FWL 15 FNL & 315 FWL	19 30	25	19	<i>Shift ~150' south of CCU 19-1 well site</i>
CCU 19-1-25-19	1070 FSL & 590 FEL	19	25	19	<i>~0.8 miles east of proposed well site</i>
CCU 30-1 & 29-1	330 FSL & 530 FWL	29	25	19	<i>~0.5 miles east of proposed CCU 30-1</i>
CCU 30-1-25-19	<i>Any other location outside of the LWC area</i>				

Table 2: Alternative Offsite Production Facilities

Facility	Qtr./ Qtr.	Section	Township (S)	Range (E)	Notes
Offsite Facility A	NWNW	11	25	18	<i>Offsite Facility for production from the CCU 5-1, 5-2, & 9-1(1) multi-well pad Or CCU 5-1, 5-2, & 9-1(2) multi-well pad</i>
Offsite Facility B	SENE	12	25	18	<i>Offsite Facility for production from the CCU 6-1, CCU 7-1-25-19, & CCU 13-1 wells</i>
Offsite Facility C	NWNW	7	25	19	<i>Offsite Facility for production from the CCU 6-1, CCU 7-1-25-19, & CCU 13-1 wells</i>
Offsite Facility D	NESW	26	25	19	<i>Offsite Facility for production from the CCU 25-1-25-19 well site; The facility would be located upon the CCU 26-2 pad</i>



***No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of this data for individual use or aggregation.

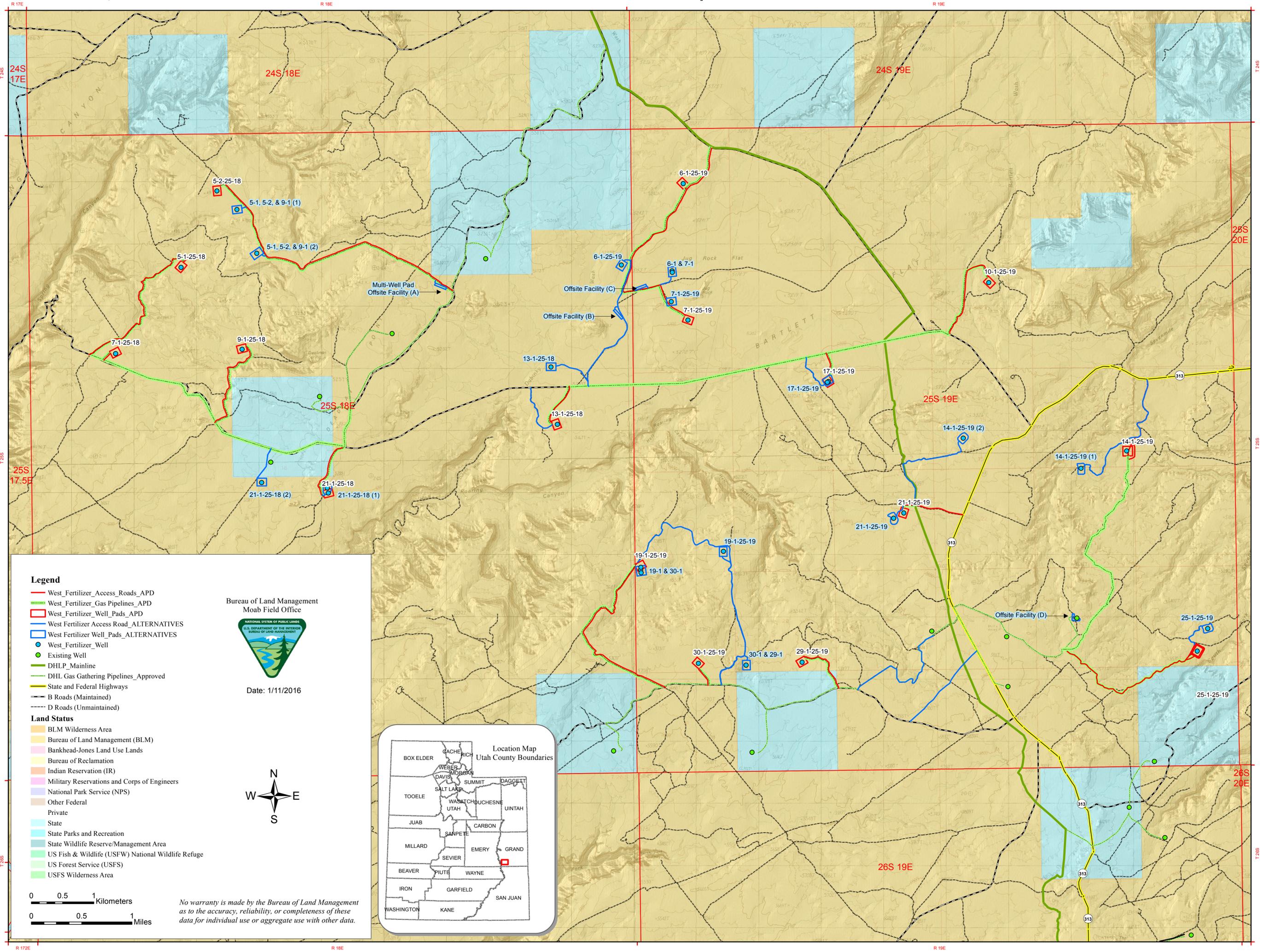
West Fertilizer 15 Pad Oil & Gas Project Map 1 Grand County, Utah



- Dead Horse Lateral Pipeline
- Proposed Gathering Line
- Proposed Access Road
- - - Proposed Class D Road Upgrade
- Existing Roads
- Proposed Well Pad
- Cane Creek Unit Boundary
- Federal Land
- State Land

Preliminary Alternatives

Fidelity Exploration and Production Company's West Fertilizer 16-Pad Oil and Gas Project



- Legend**
- West_Fertilizer_Access_Roads_APD
 - West_Fertilizer_Gas_Pipelines_APD
 - West_Fertilizer_Well_Pads_APD
 - West_Fertilizer_Access_Road_ALTERNATIVES
 - West_Fertilizer_Well_Pads_ALTERNATIVES
 - West_Fertilizer_Well
 - Existing Well
 - DHLP_Mainline
 - DHL Gas Gathering Pipelines_Approved
 - State and Federal Highways
 - B Roads (Maintained)
 - D Roads (Unmaintained)
- Land Status**
- BLM Wilderness Area
 - Bureau of Land Management (BLM)
 - Bankhead-Jones Land Use Lands
 - Bureau of Reclamation
 - Indian Reservation (IR)
 - Military Reservations and Corps of Engineers
 - National Park Service (NPS)
 - Other Federal
 - Private
 - State
 - State Parks and Recreation
 - State Wildlife Reserve/Management Area
 - US Fish & Wildlife (USFW) National Wildlife Refuge
 - US Forest Service (USFS)
 - USFS Wilderness Area

Bureau of Land Management
Moab Field Office



Date: 1/11/2016



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

