

2/16/10

Orr Energy
AG Proposed Site Specific Best Management Practices (BMPs)

1. General and Aesthetic:

Develop multi-well site by using directional drilling to reduce cumulative impacts and adverse impacts on wildlife resources.

Co-locate gas and water gathering lines, and mitigate any erosion problems that arise due to the construction of any pipeline(s).

All surface facilities not subject to safety requirements shall be painted to blend with the natural color of the landscape.

Utilize only such area around each producing well as is reasonably necessary.

2. Stormwater:

Site-specific adaptive Best Management Practices (BMPs) and systematic monitoring and maintenance will be employed. BMPs may include run-on/run-off controls such as ditches, berms, basins, straw wattles, silt fencing or other erosion and sediment control methods, to reduce potential erosion and sediment production/transport. Use of berms, material covering/storage, good housekeeping and spill response procedures (as detailed in SPCC plan) will prevent communication of sediment, hydrocarbons and chemicals with surface/groundwater.

A stormwater construction permit from CDPHE will be sought at least 10 days prior to breaking ground if total surface disturbance is anticipated to exceed 1 acre.

3. Topsoil Stripping, Storage, and Replacement:

Topsoil shall be stripped during construction of well pads, pipelines, roads, or other surface facilities. This shall include all growth medium as indicated by color and/or texture. Stripped topsoil shall be stored separately from subsoil or other excavated material and replaced prior to interim seedbed preparation. It will be managed in such a way as to protect it from wind and erosion.

4. Vegetation, Interim and Final Reclamation:

Orr Energy will remove only the minimum amount of vegetation necessary for the construction of roads and facilities.

Interim reclamation, to reduce a well pad to the size needed for production, shall commence as soon as reasonable possible and no later than 3 months following completion of the last well planned for the pad on crop land. Seed selection will be based on availability and the recommendations of the surface owner. Planting and germination techniques will be consistent with seasonal site characteristics.

Final reclamation shall be completed to the reasonable satisfaction of the Owner as soon as practical and in accordance with all regulatory agency standards.

5. Spill Containment, Control, Countermeasure:

All installed production facilities, (e.g. storage tanks, load-outs, or separation/ treating units,) that have the potential to leak or spill oil, condensate, produced water, glycol, or other fluid which may constitute a hazard to public health or safety shall be placed within appropriate secondary containment structures. Structures may consist of earthen berms or metallic berms, installed so that no spill or leakage can drain, or otherwise escape to ground water, surface water, or navigable waters before discovery and cleanup. A structure shall hold 110% of the capacity the largest single tank it contains and be sufficiently impervious.

Chemical containers shall be clearly labeled, maintained in good condition and placed within secondary containment, for protection against spill or puncture. They shall not be stored on bare ground. Orr Energy will not permit the release or discharge of any toxic or hazardous chemicals or wastes on Owner's land.

Orr Energy maintains a dynamic multi-facility SPCC plan which will be updated with this facility after construction, and re-certified by a licensed professional engineer.

6. Weed Control & Good housekeeping:

The operator shall regularly monitor and promptly control noxious weeds or other undesirable plant species.

Site and roadways will be kept free of litter and debris.

7. Access Roads

Dust control will be addressed on an as-needed basis with water truck spraying.

No construction or routine maintenance activities will be performed during periods when the road is too wet to adequately support construction equipment.

8. Wildlife including Migratory Bird Treaty Act

All production equipment with a chimney, vent or stack shall be fitted with a device that will prevent birds from entering the chimney, such as an excluder cone, metal cage or equivalent.

Drilling pits (reserve, cuttings, etc) will not be used to store free oil. Any free oil will immediately be removed from pit and disposed of in accordance with regulations.