

## Applicant Proposed BMPs

*S & P Energy, LLC proposes to implement the following Best Management Practices (BMPs) to prevent or reduce impacts caused by oil and gas operations. The following BMPs have been developed with landowner review:*

S & P Energy, LLC proposes the following applicant BMPs:

- Develop multiple well sites by using directional drilling to reduce cumulative impacts and adverse impacts on wildlife resources.
- Fence the well site and production facilities after drilling to restrict public and wildlife access.
- S & P Energy shall install and utilize bear-proof dumpsters and trash receptacles for food related trash at all facilities that generate such trash.
- Based on USGS elevation data and available depth to groundwater data (household use water well permit #245194), drilling pits are not in a sensitive area for groundwater protection. Furthermore, drilling pit contents are not anticipated to exceed concentrations of TPH and chloride referenced in COGCC rule 9003.a(3)
- Pits will maintain 2 feet of freeboard and be kept free of any surface accumulation of oil or condensate.
- Keep the well site location, the road, and the pipeline easement safe and free of noxious weeds, litter and debris.
- Use straw wattles and other measures to prevent erosion and nonsource pollution.
- S & P Energy will not permit the release or discharge of any toxic or hazardous chemicals or wastes on Owner's land.
- Chemical containers shall be clearly labeled, maintained in good condition, protected against spill, puncture and precipitation. They shall not be stored on bare ground.
- Spray for noxious weeds, and implement dust control, as needed.
- Remove only the minimum amount of vegetation necessary for the construction of roads and facilities.
- 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.
- No construction or routine maintenance activities will be performed during periods when the soil is too wet to adequately support construction equipment.
- All surface facilities not subject to safety requirements shall be painted to blend with a shade slightly darker than the natural color of the landscape.
- Utilize only such area around each producing well as is reasonably necessary.
- Restore the remainder of the well site location to its original condition within a reasonable time after the completion of operations.
- Construct and maintain gates where any roads used by S & P Energy, LLC that cross through fences on the leased premises.
- Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation.

- All surface restoration shall be accomplished to the satisfaction of Owner.
- All reseeding shall be done with grasses consistent with a Rocky Mountain native mix and during planting period suggested by Owner. Reseeding methodologies, such as mulch, crimping and / or hydro seeding shall be consistent with the site characteristics such as slope and precipitation.
- Ensure that a growing ground cover is established upon the disturbed soils, and reseed as necessary. If vegetation comparable to the original condition of the disturbed area is not established, such re-seeding shall be continued until such vegetation is established. If wildlife traffic interferes with re-growth, access by wildlife will be restricted.
- Co-locate gas and water gathering lines, and mitigate any erosion problems that arise due to the construction of any pipeline(s).
- Final reclamation shall be completed to the reasonable satisfaction of the Owner as soon as practical after installation (weather permitting) and in accordance with regulatory agency standards (BLM/COGCC).
- 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.