

Mull Drilling Company Inc.

PROPOSED BEST MANAGEMENT PRACTICES – HOFFMAN BUSBY #1-24

Mull Drilling Company (MDC) conducts its exploration and production operations in accordance with applicable Federal, State and local regulations. In addition, MDC will implement the following Best Management Practices at the Hoffman Busby #1-24.

PLANNING

- Conduct Initial Site Assessment
 - Identification of nearby water bodies
 - Identification of vegetation types
 - Identification of protected wildlife species
 - Identification of potential access routes to minimize disturbances
 - Identification of nearby improvements

PRE-CONSTRUCTION

- Preparation of a Storm Water Pollution Prevention Plan. Acquisition of a Storm Water Discharge Permit
- Consultation with the surface landowner or appointed agent
- Finalize access routes
- Finalize well pad location to minimize surface grade impacts
- Finalize well pad layout to minimize disturbances
- Develop wildlife management plan if protected species are present

CONSTRUCTION

- Access road, well pad and pit disturbances minimized
- Soils segregated by type to facilitate reclamation
- Storm water controls deployed and routinely inspected

DRILLING/COMPLETION OPERATIONS & STRUCTURAL PRACTICES

- Implement Storm Water Pollution Prevention Plan, including routine inspections and evaluation of effectiveness
- Locate tank batteries at safe distance from public roadways and railhead
- Full containment for stock tanks and separators
- Installation of pipelines in common trenches when practical
- Installation of pipelines at right angles to water bodies (drainages, wetlands, perennial water bodies) where practical

GENERAL HOUSEKEEPING

- Drilling and production operations conducted in safe, workmanlike manner. Safety expectations include good housekeeping.
- During drilling/completion operations, debris stored in caged container which is removed from the site.
- During production operations, the lease is inspected daily by MDC personnel.

MATERIAL HANDLING AND SPILL PREVENTION

- During drilling/completion operations, storage areas graded towards pit
- During production operations, implementation of Spill Prevention, Control and Countermeasure Plan & daily inspection
- All stock and produced water tanks have secondary containment

STORM WATER/EROSION CONTROL

- During drilling / completion operations, implementation of Storm Water Pollution Prevention Plan
- Following drilling/completion operations, prompt reclamation of disturbed areas
- During production operations, implementation of MDC's Post Construction Storm Water Management Program

WILDLIFE

- Development and implementation of a Wildlife Management Plan if protected species are present

INTERIM RECLAMATION

- Debris and waste material removed
- Areas not in use reclaimed promptly; pits closed using segregated material; well pad and other compacted surfaces ripped
- Noxious weeds controlled

FINAL RECLAMATION

- All equipment and debris removed
- All remaining disturbed areas, including access roads, reclaimed
- Noxious Weed Control Plan developed if appropriate

SITE SPECIFIC

1. *Per ephemeral stream 781 feet north of proposed well pad – structural practices will be implemented at the site to minimize erosion and sediment transport. Practices may include but are not limited to: straw bales, wattles/sediment control logs, silt fences, earth dikes, drainage swales, sediment traps, subsurface drains, pipe slope drains, inlet protection, outlet protection, gabions, and temporary sediment basins.*