

In addition to compliance with General Operating Requirements required under COGCC rule 1203 to be applied in Sensitive Wildlife Habitat and Restricted Surface Occupancy areas or COGCC 1204 to be applied statewide or in areas noted in the Rule, WPX will employ the following BMPs either field wide or at the specific location for which this Form 2A is being submitted.

Field Wide BMPs:

General

- Treat/control noxious weeds/plants including Tamarisk
- Focus BMPs on critical wildlife seclusion and “crucial habitats”
- Continue to Support Operation Game Thief
- Continue to support CDOW sportsman’s programs
- Restrict and/or manage grazing to benefit wildlife
- Support research to test the effectiveness of specific Best Management Practices

Planning

- Plan pipelines routes ahead of time to avoid field fitting and reduce excessive ROW widths and reclamation.
- Adequately size infrastructure and facilities to accommodate both current and future gas production.

Construction

- Surface roads to ensure that the anticipated volume of traffic and the weight and speed of vehicles using the road do not cause environmental damage, including generation of fugitive dust and contribution of sediment to downstream areas.
- Salvage topsoil from all road construction and other rights-of-way and re-apply during interim and final reclamation.
- Strip and segregate topsoil prior to construction. Appropriately configure topsoil piles and immediately seed to control erosion, prevent weed establishment and maintain soil microbial activity

Drilling/Completions

- Promptly report spills that affect wildlife to the CPW.
- Store and stage emergency spill response equipment at strategic locations so that it is available to expedite effective spill response.
- Limit parking to already disturbed areas that have not yet been reclaimed

Production/Reclamation

- Install automated emergency response systems (e.g., high tank alarms, emergency shut-down systems, etc.).
- Implement fugitive dust control program

- Locate above-ground facilities to minimize the visual effect (e.g., low profile equipment, appropriate paint color, vegetation screening in wooded areas, etc.).
- Apply an aggressive, integrated, noxious and invasive weed management plan. Utilize an adaptive management strategy that permits effective responses to monitored findings and reflects local site and geologic conditions
- Evaluate the utility of soil amendment application or consider importing topsoil to achieve effective reclamation.
- Use locally adapted seed whenever available and approved by landowner.
- Use appropriately diverse reclamation seed mixes that mirror an appropriate reference area for the site being reclaimed where approved by landowner.
- Conduct seeding in a manner that ensures that seedbed preparation and planting techniques are targeted toward the varied needs of grasses, forbs and shrubs (e.g., seed forbs and shrubs separately from grasses, broadcast big sagebrush but drill grasses, etc.)
- Seed during appropriate season to increase likelihood of reclamation success
- Do not include aggressive, non-native grasses in reclamation seed mixes
- Choose reference areas as goals for reclamation that have high wildlife value, with attributes such a diverse and productive understory of vegetation, productive and palatable shrubs, and a high prevalence of native species.
- Establish vegetation with total perennial non-invasive plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.
- Establish vegetation with plant diversity of non-invasive species which is at least half that of pre-disturbance or reference area levels. Quantify diversity of vegetation using a metric that considers only species with at least 3 percent relative plant cover.
- Establish permanent and monumented photo points and vegetation measurement plots or transects; monitor at least annually until plant cover, composition, and diversity standards have been met.
- Observe and maintain a performance standard for reclamation success characterized by the establishment of a self-sustaining, vigorous, diverse, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development.
- Use early and effective reclamation techniques, including interim reclamation to accelerate return of disturbed areas for use by wildlife
- Remove all unnecessary infrastructure during the production phase.
- Remediate hydrocarbon spills on disturbed areas prior to reclamation.
- Complete final reclamation activities so that seeding occurs during the first optimal season following plugging and abandonment of oil and gas wells.
- Perform interim reclamation to final reclamation species composition and establishment standards.
- Perform interim reclamation on all disturbed areas not needed for active support of production operations
- Remove and properly dispose of degraded silt fencing and erosion control materials after their utility has expired

- Apply certified weed free mulch and crimp or tacify to remain in place to reclaim areas for seed preservation and moisture retention
- Control weeds in areas surrounding reclamation areas in order to reduce weed competition
- Educate employees and contractors about weed issues
- Census and assess the utilization of the reclaimed areas by the target species
- Maintain pre and post development site inspection records and monitor operations for compliance
- Utilize GIS technologies to assess the extent of disturbance and document the reclamation progression and the footprint of disturbances
- Identify native species for which commercial seed sources are not available. Provide support to contractors for developing cultivation and seed production techniques for needed species
- Conduct reclamation field trials to match seed mixes, soil preparation techniques, and planting methods to local conditions.

Although this location is located within 500 ft. of perennial, ephemeral, or intermittent surface water according to USGS mapped surface waters, the attached Sensitive Area Determination concludes that the location is not within a sensitive area due to the low potential for impacts to surface water in the case of a facility release. However, in order to satisfy COGCC guidance requiring that all locations within 500 ft. of mapped surface water incorporate BMPs to protect that surface water, WPX will employ the following BMPs at this location:

- WPX will ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
- WPX will implement best management practices to contain any unintentional release of fluids.
- Either a lined drilling pit or closed loop system will be implemented.