



COLORADO

Parks and Wildlife

Department of Natural Resources

Lamar Service Center
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Adam Petz, Land Manager
Grand Mesa Operating Company
1700 N. Waterfront Parkway, Bldg 600
Wichita, KS 67206

April 17, 2017

RE: Grand Mesa Pikes #1-14

Dear Mr. Petz,

Colorado Parks and Wildlife (CPW) reviewed the 2A permit application for the above-referenced Oil and Gas Facility located within Crowley County at SWNE Section 14, Township 20S, Range 56W. Based on the location within swift fox habitat the mineral owner, Colorado State Land Board, included a lease stipulation stating that 'prior to surface occupancy, Lessee must obtain approval from Lessor's District Manager for siting of access and rig placement due to Swift Fox habitat.'

On April 10, 2017, CPW personnel Jordon DePriest and Karen Voltura met with Michael Polley, representing Grand Mesa Operating Company, to assess habitat for potential swift fox occupancy at the well site and to discuss habitat measures and Best Management Practices that could be implemented at the location. The Pikes 1-14 well location is in rangeland and currently used as grazing land for cattle. The active disturbance from cattle as well as the distance from the nearest observed prairie dog colony makes the Pikes 1-14 well location a less likely site for a swift fox den when compared to the surrounding habitat. No swift fox were observed during the site visit and no den locations were identified in the vicinity of the planned well pad.

General operating standards were also discussed during the on-site visit including the timeline for drilling activities and plans for waste disposal. Fluids will be held on site and drill cuttings will be placed in lined pits until fluids are evaporated. Dry cuttings will then be tested and disposed of according to COGCC rules. Mr. Polley indicated the pad would be fenced due to the presence of cattle on site. As there will be evaporation pits associated with the project, any fencing would also provide some protection for wildlife by making any open pits with mud or water less accessible and thus reducing any risk of entrapment for mule deer and pronghorn. Whenever possible CPW recommends the use of wildlife exclusion fencing, ideally 8 ft woven wire fence, in areas where open pits will be present.



Grand Mesa Operating Company has two additional well sites currently permitted in the vicinity of Peaks 1-14. At the time of the onsite visit there were no identified dates or a schedule for drilling those wells. COGCC 2A permits for all three Grand Mesa sites include the following COA for Swift Fox habitat:

CPW-Wildlife - Avoidance-SWIFT FOX- The operator agrees to survey for swift fox den sites in CPW-identified suitable habitat prior to new oil and gas operations between March 15 and June 15.

CPW appreciates Grand Mesa's willingness to avoid swift fox maternal dens on all three well locations. The 2 additional locations were included in the consultation and marked well locations were visited for Torrey's 1-11 (in SENW Section 11, Township 20S, Range 56W) and Longs 1-2 (in SESW Section 2, Township 20S, Range 56W). These two sites are very similar to the Pikes 1-14 location but there was no active grazing by cattle at the time of the visit. The Longs 1-2 site is the closest in proximity to the nearby prairie dog colony, with the nearest observed occupied colony approximately 1 mile distance from the well site. At the time of the visit there was active nesting by burrowing owls in the colony as well. In the future, if these wells are drilled, CPW supports the COA that swift fox surveys be completed by the operator at these locations between March 15 and June 15 to avoid maternal swift fox dens.

If you have any questions, please contact District Wildlife Manager Jordon DePriest at (719)-940-3588. CPW appreciates Grand Mesa's cooperation and support for wildlife BMPs and we look forward to working with you for the benefit of wildlife.

Sincerely,



Travis Black
Area 12 Wildlife Manager

cc: Brett Ackerman, SE Deputy Regional Manager
Jordon DePriest, DWM
Karen Voltura, SE Regional Energy Liaison