

**From:** [Brown, Walter A -FS](#)  
**To:** [Rusty Kelly](#)  
**Cc:** [Dave Kubeczko - DNR](#); [Nolan Redmond](#)  
**Subject:** RE: Catamount goose creek wells  
**Date:** Thursday, June 21, 2018 4:08:10 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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The USFS concurs with Conditions Of Approval (COAs) numbers 1 -11 in the “comments” document from CPW. The USFS will consider the other comments and the suggested seed mix from CPW as we prepare final COAs for the USFS SUPOs that will be attached to the BLM APDs for the Goose Creek project.

Please let me know if you have any questions.

Thanks,  
Walt



**Walt Brown**  
**Geologist**  
**Forest Service**  
**San Juan National Forest**

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**Caring for the land and serving people**

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**From:** Rusty Kelly [mailto:[rkelly@catamountep.com](mailto:rkelly@catamountep.com)]  
**Sent:** Thursday, June 21, 2018 1:11 PM  
**To:** Brown, Walter A -FS <[wabrown@fs.fed.us](mailto:wabrown@fs.fed.us)>  
**Cc:** Dave Kubeczko - DNR <[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)>; Nolan Redmond <[nredmond@catamountep.com](mailto:nredmond@catamountep.com)>  
**Subject:** FW: Catamount goose creek wells

Walt,

Please see the below from the COGCC. Catamount and COGCC are seeking confirmation that USFS has agreed to COAs and to seed mix attached?

Thanks

Rusty Kelly

720-484-2360 (O)  
303-653-4122 (C)

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**From:** Nolan Redmond  
**Sent:** Thursday, June 21, 2018 7:11 AM  
**To:** Rusty Kelly <[rkelly@catamountep.com](mailto:rkelly@catamountep.com)>  
**Subject:** Fwd: Catamount goose creek wells

Sent from my Verizon, Samsung Galaxy smartphone

----- Originalmessage-----

**From:** Dave Kubezko - DNR <[dave.kubezko@state.co.us](mailto:dave.kubezko@state.co.us)>  
**Date:** 6/21/18 6:44 AM (GMT-07:00)  
**To:** Nolan Redmond <[nredmond@catamountep.com](mailto:nredmond@catamountep.com)>  
**Subject:** FW: Catamount goose creek wells

Nolan,

Please see the attached email from CPW. I have no confirmation that the Forest Service has agreed to all of the COAs listed. Catamount needs to review and confirm that the forest Service has consented before COGCC can place on the Form 2A permits.

If you have any questions, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email.  
Thanks.

Dave

David A. Kubezko, PG  
Oil and Gas Location Assessment Specialist  
Western Colorado



Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
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FAX: (970) 625-5682  
Cell: (970) 309-2514



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**From:** Magee - DNR, Brian [mailto:[brian.magee@state.co.us](mailto:brian.magee@state.co.us)]  
**Sent:** Tuesday, June 19, 2018 5:02 PM  
**To:** Dave Kubeczko; Brown, Walter A -FS  
**Cc:** Jon Holst; Matt Thorpe; Brad Weinmeister; Stephanie Schuler  
**Subject:** Catamount goose creek wells

Dave and Walt-

Attached CPW wildlife specific Conditions of Approvals that have been consented to by the USFS.

In addition, there are several recommendations for your consideration. We are happy to discuss in more detail as you move through your respective permitting processes.

Dave- I have entered the attached comments into the COGCC permitting site. Can you include the attached Seed mix recommendation as well.

Please let Jon or I know if you have any questions.

Thanks,

Brian

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Brian Magee  
Landuse Coordinator  
Southwest Region

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June 6, 2018

#### CPW Comments on the Pargin Mountain 11 Bull Creek 28-2 and Bull Creek 28-4 Well Pad Locations

Representatives from the BLM, US Forest Service, COGCC, Operator, and CPW attended the onsite on several proposed well pad locations on the Goose Creek drainage of the HD Mountains on June 5, 2018. The proposed project is entirely within the San Juan National Forest and includes an expansion of the existing Pargin Mountain 11 Pad, and the new construction of the Bull Creek 28-2 and Bull Creek 28-4 pads, access roads, and pipelines. Total surface disturbance for the well pads is approximately 3.5 acres. The proposed project include construction of approximately 2.25 miles access road/ pipeline ROW (40 feet wide), resulting in an additional approximate 11 acres of surface disturbance. These well locations were analyzed in the July 2006 Northern San Juan Basin Coal Bed Methane Project Environmental Impact Statement (EIS). The Pargin Mountain 11 pad is located in COGCC designated mule deer critical winter range and within an elk winter concentration area; the Bull Creek 28-2 pad is located within COGCC designated mule deer winter critical winter range, and the Bull Creek 28-4 is located in deer and elk winter range mapped by CPW. The surface owner has given consent to the following wildlife specific Conditions of Approval for Pargin Mountain 11, Bull Creek 28-2, Bull Creek 28-4 well pads, access roads, and pipelines:

- 1) Construction activities are only allowed during the period beginning on May 1 and ending on November 30 of any given year unless otherwise authorized by the FS in writing.
- 2) All non-routine activities must be conducted during the period beginning on May 1 and ending on November 30 of any given year unless otherwise authorized by the FS in writing.
- 3) Scheduled routine activities, including snow plowing, to occur between 9:00 am and 3:00 pm during the period beginning December 1 and ending on April 30 of any given year unless otherwise authorized by the FS in writing.
- 4) Trenches left open overnight shall be equipped with dirt or plank wildlife escape ramps at regular intervals (Maximum of .25 mile intervals).
- 5) Nets, screens or covers will be installed over all fluid pits, vents, tanks, and equipment openings to prevent wildlife mortality or wildlife contact with well products, fluids, or equipment openings. More information can be obtained at the U.S. Fish and Wildlife Service's wildlife contaminants website: (<http://mountain-prairie.fws.gov/contaminants/contaminants1c.html>).
- 6) Unless otherwise authorized by the FS, automated monitoring systems must be installed at well and pipeline facilities to minimize vehicle trips and reduce human/wildlife conflicts.
- 7) To the extent practicable, use noise reduction technologies at all facilities during construction, testing and operation phases.
- 8) Prohibit activities within 300 feet of any occupied raptor nests during the period May 1 to July 31.
- 9) The operator shall dispose of refuse from this use, including waste materials, garbage and rubbish of all kinds by removing it from public lands. If trash is stored on site prior the trash must be stored in a bear-proof manner.

10) Revegetation Seed Mixes: Unless otherwise authorized, a minimum of two native grass from the list below will be used at the recommended rates. One of the annual species listed below can also be used along with the native species.

Native Grass Seed Species

Arizona fescue ( <i>Festuca arizonica</i> ), variety Redondo	4#PLS/acre
Western wheatgrass ( <i>Pascopyrum smithii</i> ), varieties Barton/Rosanna	10#PLS/acre
Indian Ricegrass ( <i>Oryzopsis hymenoides</i> ), varieties Paloma/Rimrock/Nezpar	6#PLS/acre
blue grama ( <i>Bouteloua gracilis</i> ), varieties Alma/Hachita/Lovington	3#PLS/acre
muttongrass ( <i>Poa fendleriana</i> )	3# PLS/acre
junegrass ( <i>Koeleria macrantha</i> ), varieties Prairie/Uncompahgre Plateau	4#PLS/acre
bottlebrush squirreltail ( <i>Elymus elymoides</i> ), varieties Colorado Ecotype/Toejam	8#PLS/acre
needleandthread ( <i>Stipa comata</i> )	10#PLS/acre

Annual Species

Barley ( <i>Hordeum vulgare</i> )	80#PLS/acre
Wheat ( <i>Triticum aestivum</i> x <i>Secale cereale</i> )	80#PLS/acre
Oats ( <i>Avena sativa</i> )	80#PLS/acre

11) Compensatory Mitigation Requirement

Elk and Deer Habitat Mitigation Measure: Every five years, unless otherwise determined by the Authorized Officer, operators conducting oil and gas activities in the NSJB EIS project area will complete elk and deer habitat enhancement project(s). See NSJB FEIS page 3-289, section 3.9.6.4.2 for details. This includes habitat enhancement in deer and elk winter range equal or greater to the acreage disturbed by development.

In addition, to the Conditions of Approval to be included on the COGCC and USFS permits, CPW offer the following comments and recommendations regarding avoidance, minimization, and mitigation measures to reduce and offset the development impacts of oil and gas facilities in the Goose Creek area on wildlife:

- The EIS states that removal of sagebrush should be avoided, and the well pads are located in sagebrush parks that are heavily utilized in the winter by deer and elk. The shrub browse availability is critical for wintering big game animals. CPW recommends that the USFS and the COGCC evaluate the need to include native shrubs and forbs in the seed mix for interim and final reclamation. Attached is CPW's recommended wildlife friendly seed mix.
- Surface water availability is limited in the HD Mountains. There are numerous small existing water impoundments catching ephemeral and intermittent sheet flow from the hillsides near the proposed pad locations. CPW recommends maintaining these water impoundments to collect surface water as they are valuable to wildlife including birds, bats, small mammals, reptiles, amphibians, as well as big game animals.
- As noted in Number 11 above the EIS states that "every five years,... the operator will conduct habitat enhancement projects". There is some uncertainty in the EIS regarding the frequency and

duration of the compensatory mitigation habitat improvement/enhancement offsets. In our experience habitat enhancement projects typically result in improved forage condition for 7-10 years post treatment for big game. CPW supports compensatory mitigation efforts that persist for the duration of the impact. In this case, if an oil and gas facility is expected to have a 30 year life, then the habitat enhancements should be commensurate with duration of the impact. Please provide clarification on the mitigation requirements described in the EIS. In addition, CPW is available to help identify and assist in the planning of appropriate mitigation habitat enhancement projects.

- The EIS discusses and acknowledges there are indirect impacts to big game from oil and gas development. However, the EIS was limited by the science and understanding of how to analyze and quantify indirect impacts when ROD was signed in 2006. Since that time the scientific understanding regarding those indirect impacts has matured. The proposed development is fragmenting a significant area of big game winter range that is heavily utilized during the winter. We recommend that the USFS quantify the indirect impacts using the current best available science, and consider mitigating the indirect impacts to support CPW big game population objectives.

**Ecotype: Pinyon/Juniper Woodlands-Sagebrush**

Species

GRASSES	Variety*	% of mix	FRPLS*	PLS rate/acre
Western wheatgrass	Arriba	10%	8	0.8
Bluebunch wheatgrass	Secar/Goldar	15%	10	1.5
Sandberg bluegrass	"UP release"	15%	2	0.3
Muttongrass	(UP Colona)	10%	1	0.1
Junegrass	Uncompahgre	15%	1	0.15
Indian ricegrass	White River	10%	6	0.6
Sand dropseed		10%	1	0.1
Blue grama	Hatchita	5%	1.5	0.075
Galleta	Viva	10%	6	0.6

\*Select 5 of 9 species based on availability

100%

\*recommended variety unless locally collected seed is available, in which case locally collected seed is preferred

\*based on drill seeding; 2x if broadcasting

FORBS	Variety*	% of mix	FRPLS*	PLS rate/acre
Utah sweetvetch	(UP Uncompahgre) TIMP	15%	15	2.25
Lewis flax	Maple grove	15%	4	0.6
Penstemon cyanocaulis* (bluestem)	(UP San Miguel)	15%	1	0.15
Penstemon comarrhenus (dusty)	(UP Delta)	15%	1	0.15
Penstemon palmeri (palmer)		15%	2	0.3
Penstemon eatonii (firecracker)		15%	1	0.15
Silky lupine -sericeus*		15%	20	3
Gooseberryleaf globemallow		15%	2	0.3
Oregon daisy	(UP Dry Fork)	15%	1	0.15

\*Select 5 of 9 species based on availability

SHRUBS*	Variety	PLS rate/acre
Artemesia** (+)		1
Fourwing saltbush		1
Winterfat	Hatch	1
Fringed sage		0.5
cliffrose		1

\*\*wyomingensis or nova depending on site

(+) to be included in all PJ/SS mixes

\*Select 3 of the 5 species based on availability

NOTE: (UP)- The UP varieties are in development and may not be available in sufficient quantities.

In which case, the most appropriate available variety should be utilized

Supply and availability should increase in future years

at which time the UP varieties should be used.