

FORM
2A

Rev
08/13

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401601105

Date Received:

04/18/2018

Oil and Gas Location Assessment

New Location Refile Amend Existing Location Location#: _____

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

456203

Expiration Date:

07/23/2021

This location assessment is included as part of a permit application.

CONSULTATION

- This location is included in a Comprehensive Drilling Plan. CDP # _____
- This location is in a sensitive wildlife habitat area.
- This location is in a wildlife restricted surface occupancy area.
- This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10464

Name: CATAMOUNT ENERGY PARTNERS LLC

Address: 1801 BROADWAY #1000

City: DENVER State: CO Zip: 80202

Contact Information

Name: Nolan Redmond

Phone: (720) 484-2344

Fax: ()

email: nredmond@catamountep.com

RECLAMATION FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID: 20160137 Gas Facility Surety ID: _____
- Waste Management Surety ID: _____

LOCATION IDENTIFICATION

Name: BULL CREEK UNIT-M34N5W Number: 28NESE

County: ARCHULETA

Quarter: NWSE Section: 28 Township: 34N Range: 5W Meridian: M Ground Elevation: 6734

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 1323 feet FSL from North or South section line

1325 feet FEL from East or West section line

Latitude: 37.159047 Longitude: -107.393403

PDOP Reading: 2.0 Date of Measurement: 11/22/2017

Instrument Operator's Name: Nelson Ross

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: U.S.F.S.

Phone: 970-247-4874

Address: 15 Burnett Court

Fax:

Address:

Email:

City: Durango State: CO Zip: 81301

Surface Owner: Fee State Federal Indian

Check all that apply. The Surface Owner: is the mineral owner

is committed to an oil and Gas Lease

has signed the Oil and Gas Lease

is the applicant

The Mineral Owner beneath this Oil and Gas Location is: Fee State Federal Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: oil and gas lease

Surface damage assurance if no agreement is in place: Surface Surety ID:

Date of Rule 306 surface owner consultation 08/03/2017

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe):

Subdivided: Industrial Commercial Residential

Future Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe):

Subdivided: Industrial Commercial Residential

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	5280 Feet	5280 Feet
Building Unit:	5280 Feet	5280 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	1768 Feet	1688 Feet
Above Ground Utility:	5280 Feet	5280 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	3998 Feet	3998 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
 - Enter 5280 for distance greater than 1 mile.
 - Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
 - Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.
 - For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- Buffer Zone
 Exception Zone
 Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
 - Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
 - Urban Mitigation Area - as defined in 100-Series Rules.
 - Large UMA Facility - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: _____

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 4D - Carracas loam, 4 to 25 percent slopes _____
 NRCS Map Unit Name: 36D - Nunn Loam, 4 to 25 percent slopes _____
 NRCS Map Unit Name: _____

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes No

Plant species from: NRCS or, field observation Date of observation: _____

List individual species: big sagebrush, western wheatgrass, rabbitbrush, mountain mahogany, antelope bitterbrush, needlegrass, mountain muhly, arizona fescue, fringed sagebrush, bluegrass, bottbrush squirreltail

Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- Alpine (above timberline)
- Other (describe): _____

WATER RESOURCES

Is this a sensitive area: No Yes

Distance to nearest

downgradient surface water feature: 178 Feet

water well: 13254 Feet

Estimated depth to ground water at Oil and Gas Location 55 Feet

Basis for depth to groundwater and sensitive area determination:

Average level to ground water in closest water wells to the east and south.

Is the location in a riparian area: No Yes

Was an Army Corps of Engineers Section 404 permit filed No Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: No

Is the Location within a Floodplain? No Yes Floodplain Data Sources Reviewed (check all that apply)

Federal (FEMA)

State

County

Local

Other _____

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 608

WILDLIFE

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on _____

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area
- Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

- Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: 04/18/2018 Email: nredmond@catamountep.com

Print Name: Nolan Redmond Title: Geo/Eng Tech

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:  _____ Director of COGCC Date: 7/24/2018

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type

Description

	In addition to the notifications required by COGCC listed in Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change); operator shall notify the COGCC 48 hours prior to rig mobilization and pipeline testing (flowlines from wellheads to separators to tanks; and/or any temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions). The appropriate COGCC individuals will automatically be email notified.
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	<p>Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations (as listed in the Operator COA/BMP Section of the Form 2A); including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices [BMPs] associated with fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals as required by CDPHE (at least every 14 days and after precipitation events), and maintained in good condition. The design/build of any perimeter berm shall be sized, constructed, and compacted sufficiently to contain fluids during drilling operations, as well as all fluids contained in temporary frac tanks during completion operations.</p> <p>The access road will be constructed and maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.</p> <p>Strategically apply fugitive dust control measures to reduce fugitive dust and coating of vegetation and deposition in water sources. Operator shall employ practices for control of fugitive dust caused by other operations, including, but not limited to the use of speed restrictions, regular road maintenance, restriction of re-construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers may be used.</p> <p>Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner or equivalent) to contain any spilled or released material around permanent produced water storage tanks.</p>
	<p>A closed loop system must be implemented during drilling (as indicated on the Form 2s and Form 2A). The moisture content of all drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. All cuttings generated during drilling with salt-based mud (SBM) must be segregated from water/bentonite based mud-(WBM-) generated drill cuttings and placed separately on the well pad. All SBM-generated drill cuttings must be kept in tanks/containers, or placed on a lined/bermed portion of the well pad; prior to disposition. The operator has indicated that 'Cuttings Disposal' will be "OFFSITE" and that the 'Cuttings Disposal Method' will be "COMMERCIAL DISPOSAL" (as shown in the 'DRILLING WASTE MANAGEMENT PROGRAM SECTION' of the Form 2A). All liners associated with salt-based drilling mud and SBM-generated drill cuttings must be disposed of offsite per CDPHE rules and regulations.</p> <p>Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.</p>
	<p>Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.</p>
	<p>Operator shall pressure test pipelines (flowlines from wellhead to separator to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. All permanent flowlines from wellhead to separator and from the separator to the tanks will also be pressure tested annually.</p>

Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Wildlife	<p>The USFS concurs with Conditions Of Approval (COAs) numbers 1 -11 in the "comments" document from CPW.</p> <p>The surface owner has given consent to the following wildlife specific Conditions of Approval for the Pargin Mountain Unit - M34N5W /34NESW (Form 2A #401623797, USFS Pargin Mountain 11 well pad) and the Bull Creek Unit - M34N5W 28NESE</p>

(Form 2A #401601105, USFS Bull Creek 28-2 well pad) well pads, access roads, and pipelines; however, since the Bull Creek Unit - M34N5W 28NENW (Form 2A #401611002, USFS Bull Creek 28-4 well pad) does not fall within CPW mapped sensitive wildlife habitat (SWH) area, these BMPs cannot be placed on that Form 2A:

- 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://mountainprairie.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 (*Festuca arizonica*), variety Redondo 4#PLS/acre
Western wheatgrass (*Pascopyrum smithii*), varieties Barton/Rosanna 10#PLS/acre
Indian Ricegrass (*Oryzopsis hymenoides*), varieties Paloma/Rimrock/Nezpar 6#PLS/acre
blue grama (*Bouteloua gracilis*), varieties Alma/Hachita/Lovington 3#PLS/acre
muttongrass (*Poa fendleriana*) 3# PLS/acre
junegrass (*Koeleria macrantha*), varieties Prairie/Uncompahgre Plateau 4#PLS/acre
bottlebrush squirreltail (*Elymus elymoides*), varieties Colorado Ecotype/Toejam 8#PLS/acre
needleandthread (*Stipa comata*) 10#PLS/acre
Annual Species
Barley (*Hordeum vulgare*) 80#PLS/acre
Wheat (*Triticum aestivum*x *Secale cereale*) 80#PLS/acre
Oats (*Avena sativa*) 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.

Total: 1 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2108495	CPW - OPERATOR - USFS CORRESPONDENCE and WILDLIFE BMPs
401601105	FORM 2A SUBMITTED
401609619	ACCESS ROAD MAP
401609624	CONST. LAYOUT DRAWINGS
401609625	LOCATION DRAWING
401609630	WELL LOCATION PLAT
401609636	NRCS MAP UNIT DESC
401609638	NRCS MAP UNIT DESC
401609639	LOCATION DRAWING
401609662	MULTI-WELL PLAN
401609768	HYDROLOGY MAP
401612153	LOCATION PICTURES
401612155	REFERENCE AREA MAP
401612157	REFERENCE AREA PICTURES
401612199	FACILITY LAYOUT DRAWING

Total Attach: 15 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Final Review Completed.	07/20/2018
Permit	Removed surface damage assurance and surface surety ID, as they are unnecessary.	07/09/2018
DOW	<p>CPW Comments on the Pargin Mountain 11 Bull Creek 28-2 and Bull Creek 28-4 Well Pad Locations</p> <p>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:</p> <p>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.</p> <p>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.</p>	06/19/2018

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 (*Festuca arizonica*), variety Redondo 4# PLS/acre

Western wheatgrass (*Pascopyrum smithii*), varieties Barton/Rosanna 10# PLS/acre

Indian Ricegrass (*Oryzopsis hymenoides*), varieties Paloma/Rimrock/Nezpar 6# PLS/acre

blue grama (*Bouteloua gracilis*), varieties Alma/Hachita/Lovington 3# PLS/acre

muttongrass (*Poa fendleriana*) 3# PLS/acre

junegrass (*Koeleria macrantha*), varieties Prairie/Uncompahgre Plateau 4# PLS/acre

bottlebrush squirreltail (*Elymus elymoides*), varieties Colorado Ecotype/Toejam 8# PLS/acre

needleandthread (*Stipa comata*) 10# PLS/acre

Annual Species

Barley (*Hordeum vulgare*) 80# PLS/acre

Wheat (*Triticum aestivum* x *Secale cereale*) 80# PLS/acre

Oats (*Avena sativa*) 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 above 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 CPWs recommended wildlife friendly seed mix.

- Surface water is availability it 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.

<p>OGLA</p>	<p>05/07/2018 – Initiated / Completed OGLA Form 2A review by Dave Kubeczko; sent email to operator indicating that the following COAs would be placed on the Form 2A unless operator had issues or concerns - notification, fluid containment and spill/release BMPs, sediment and dust control access road, cuttings containment and management, odor control, flowback to tanks only, pipeline placement, installation, inspection, and pipeline testing - operator did not reply indicating concurrence; in addition, this location has been designated a “sensitive area” due to proximity to downgradient surface water (Goose Creek, 178’ to the east-southeast); 05/24/2018 - Passed OGLA Form 2A review by Dave Kubeczko with notification, fluid containment and spill/release BMPs, sediment and dust control access road, cuttings containment and management, odor control, flowback to tanks only, pipeline placement, installation, inspection, and pipeline testing COAs. 05/24/2018 - placed Form 2A "ON HOLD" waiting for COGCC / CPW / BLM / FS Onsite scheduled for 06-05-18; 06/05/2018 - location onsite by COGCC, FS, BLM, and operator; location does fall within 'Sensitive Wildlife Habitat' (SWH), therefore a CPW Wildlife Consultation was required; operator agreed to extend CPW's consultation to June 20, 2018; 06/19/18; CPW recommendations were placed on the Form 2A by CPW-Southwest and CPW passed their task stating that the US Forest Service has agreed to COAs; 06/20/18; CPW recommendations were be sent to COGCC and the FS / BLM and should be considered to be placed on the Federal APDs as the FS and BLM deem necessary (since these agencies oversee the surface and subsurface, respectively); 06/21/18; COGCC forwarded CPW recommendations, COAs, and proposed seed mix to operator to discuss and obtain concurrence from the Forest Service that they are all in agreement with the COAs and proposed seed mix; operator sent email to Forest Service requesting concurrence of CPW's wildlife COAs, recommendations, and proposed seed mix - Forest Service replied "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."; 07/06/2018 - COGCC placed the eleven (11) operator and Forest Service agreed upon CPW Wildlife BMPs on the Form 2A and attached the CPW / Operator / USFS Correspondence and Wildlife BMPs document to this Form 2A; 07/06/2018 - took Form 2A off of "ON HOLD" and back "IN PROCESS" based on results of onsite on 06-05-18 and CPW's comments.</p>	<p>05/07/2018</p>
<p>Permit</p>	<p>Passed Completeness.</p>	<p>04/27/2018</p>

Total: 5 comment(s)