

Objective Criteria Review Summary - SandRidge Exploration & Production LLC (SandRidge), Spicer S32 Annex Pad Location; Form 2A #401860580.

This summary explains how COGCC and CPW staff conducted its technical review of the SandRidge Exploration & Production LLC, Spicer S32 Annex Pad Location; Form 2A #401860580, within the context of SB 19-181 and for the required Objective Criteria. These Form 2 permit applications met the following Objective Criteria -

1. *(Criteria 6) This new Federal Surface and Federal/Fee Minerals oil and gas location falls within a CPW mapped 'sensitive wildlife habitat' (SWH) area for greater sage grouse production, with the closest currently mapped leks being approximately 1.7 miles to the northwest, 2.7 miles to the east-northeast, and 1.8 miles to the south; a CPW Wildlife Consultation was required.*
2. *(Criteria 12) The proposed access road (the road to be constructed from existing access road leading from Jackson County Road 28 to the existing Spicer Pad [OGCC ID #324754]) and the new pad (a cutoff from this access road) falls within CPW mapped 'sensitive wildlife habitat' (SWH) area for greater sage grouse production, with the closest currently mapped leks being approximately 1.8 miles to the northwest, 2.7 miles to the east-northeast, and 1.8 miles to the south; a CPW Wildlife Consultation was required.*

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A could be approved with the proposed Best Management Practices (BMPs) and applied Conditions of Approval (COAs). The following sections provide details regarding the evaluation of each criterion.

Criteria 6: Oil and Gas Locations within a Colorado Parks and Wildlife (“CPW”) mapped Restricted Surface Occupancy Area (“RSO”) or Sensitive Wildlife Habitat (“SWH”), or locations receiving site- or species-specific CPW comments.

Criteria 12: Oil and Gas Locations with an access road (the road constructed from the public road to the Oil and Gas Location) within a RSO, SWH, 317B buffer zone, or within 200’ feet of a Building Unit on lands not subject to a Surface Use Agreement.

Site Specific Description of Applicability of Criteria 6 and 12: Based on the technical review and desktop evaluation, staff determined that this new oil and gas location and access road falls within a CPW mapped 'sensitive wildlife habitat' (SWH) area for greater sage grouse production; a CPW wildlife consultation was required.

Site Specific Measures to Address Criteria 6 and 12: CPW staff conducted a pre-consultation review of this proposed annex pad on December 18, 2018. Several wildlife BMPs for the protection of greater sage grouse production were discussed and tentatively agreed to by the operator. On May 16, 2019, COGCC, CPW, BLM, SandRidge, and consultants onsite this and several other nearby locations. Wildlife BMPs were again discussed and agreed to by the operator at that time. The agreed upon BMPs were added by CPW to the ‘Wildlife BMP’ section of the Form 2A and included the use hospital grade mufflers to reduce noise and vibrations; use of combustion chambers or enclosed flaring devices to eliminate open flares; establish guidelines to minimize wildlife mortality from vehicle collisions on roads; install and utilize bear-proof dumpsters and trash receptacles; and preclude the use of aggressive non-native grasses in greater sage grouse habitat reclamation.

COGCC staff requested CPW to conduct an additional review for the Objective Criteria. Desktop review and previous onsite indicated that the closest active leks were not in direct view to this location due to topographical features between the leks and the location. Due to the relatively low density of existing development in this area (an existing well pad to the south) and the proximity to existing Jackson County Road 28 (200 feet to the northeast) and Colorado Highway 14 (300 feet to the northwest), CPW does not feel that compensatory mitigation is necessary to offset any potential residual impacts from this location. CPW and SandRidge are currently negotiating a Wildlife Mitigation Plan (WMP) that will have an analysis component that can be used in determining the need for (and the amount of) compensatory mitigation to offset residual impacts within the currently defined development area (Federal Units). The mitigation calculations in the WMP will be based on the habitat quantification tool from the Colorado Habitat Exchange and is scientifically defensible. This would be in addition to what the operator is currently providing for mitigation.

Determination: During the technical review process for this Form 2A, COGCC staff requested additional information and clarification regarding the applicant's wildlife BMPs and Wildlife Mitigation Plan. Given that this new location is close to an existing location, close to two (2) public county roads, not in direct view of nearby active leks, operator has agreed to wildlife protective BMPs, and the non-issuance of any timing limitations by CPW or the BLM; the standard for protection of wildlife and wildlife habitat resources has been met. The Director determined Criteria 6 and 12 were sufficiently analyzed.

Staff met with the Director to discuss Objective Criteria that are met by this Oil and Gas Location. The Director determined that following the application of the additional analysis from the Objective Criteria, the permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.