

SandRidge Exploration & Production, LLC

- North Park -

Wildlife Mitigation Plan

FINAL NOVEMBER 2019

SandRidge Exploration and Production LLC (SandRidge) and Colorado Parks and Wildlife (CPW) agree to the Wildlife Mitigation Plan (WMP) attached hereto as Annex 1 for SandRidge's proposed oil and gas exploration, production development and operation activities (O&G Activities) within the North Park Wildlife Mitigation Plan (NPWMP) boundary in Jackson County, Colorado. This NPWMP boundary contains the following federal oil and gas units: Beaver Creek Unit (COC78187X), Peterson Ridge Unit (COC75018X), and Surprise Unit (COC75017X). Additionally, several private surface use agreements are in place with adjacent private landowners. The purposes of this WMP agreement are to: 1) Identify best management practices (Appendix C) to avoid, minimize, and mitigate impacts to wildlife and the environment during O&G Activities, and 2) Document that consultation between SandRidge and CPW has occurred for environment and wildlife-related issues/matters. SandRidge agrees to implement and otherwise conform its operations to the terms and conditions of this WMP as modified by agreement with the parties. This WMP does not apply to the operations of other oil and gas companies within the NPWMP boundary; however, certain of these companies may be required to adhere to SandRidge's environmental stewardship standards. SandRidge will provide this WMP to contracted companies engaged in operations within the NPWMP boundary.

CPW acknowledges that it has consulted with SandRidge regarding proposed O&G Activities in areas of Sensitive Wildlife Habitat (SWH) and in Restricted Surface Occupancy (RSO) areas, as defined by Colorado House Bill 07-1298 (HB 1298) § 34-60-102, and agrees that best management practices and mitigation measures are incorporated into this WMP. Accordingly, CPW shall inform the Colorado Oil and Gas Conservation Commission (COGCC) in writing that CPW has pre-approved consultation of any SandRidge Form 2A permit application within 5 days of electronic notice for locations within the WMP boundary. If this notification is not provided to the COGCC via CPW's eForms submission within five (5) days of the electronic notification, CPW shall be deemed to have waived consultation for that particular Form 2A permit.

The COGCC has authority over SandRidge's operations within Jackson County, Colorado. If SandRidge is not in material compliance with this WMP, then Form 2As filed by SandRidge will be subject to the consultation requirements of COGCC Rule 306.c in accordance with such rule.

The parties agree that the terms and conditions of this WMP shall inure to the benefit of and be binding upon the parties hereto and the parties' respective successors and assigns. No party may assign its rights or obligations under this WMP without the express written consent of the other party and such consent may not be unreasonably withheld.

This WMP may be modified by agreement of both CPW and SandRidge. Any such modifications of this WMP shall not be effective unless agreed to in writing by the parties in an approved Record of Modification (*see* Appendix A). In addition, this WMP is subject to such modifications as may be

required by changes in Federal or State law, or their implementation of new regulations. Any such required modification shall to the extent applicable/necessary automatically be incorporated into and be part of this WMP on the effective date of such change as if fully set forth herein and the parties agree to take all actions necessary to comply with the changes to Federal or State law, or their implementation of new regulations.

The term of this WMP agreement is five (5) years and expires on the date indicated below. The parties may agree to extend this agreement prior to its expiration. If this agreement has not otherwise been terminated, the agreement shall terminate on January 1, 2024, unless extended by written agreement of both parties. Either party may terminate its agreement to this WMP upon thirty (30) days written notice to the other party. Upon expiration of the thirty (30) days, all future obligations of the parties under this WMP are terminated. However, and notwithstanding such termination, the parties remain obligated and are required to continue to comply with the terms and conditions of this WMP for operations conducted pursuant to an approved Form 2A or associated permit that was approved during the effective period of this WMP.

It is expressly understood and agreed by all parties that, except for rights of enforcement by the COGCC set forth above, nothing in this WMP shall give or allow any claim or right of action by any other third party. The waiver of any breach of a term or condition of this WMP by a party shall not be construed or deemed a waiver of any subsequent breach of a term or condition, nor shall it impact in any way the rights of enforcement by the COGCC.

This WMP is the complete integration of all understandings between the parties. No prior or contemporaneous addition, deletion, or any other amendment thereto shall have any force or effect unless embodied herein in writing.

The signatories hereto warrant that they possess the legal authority to enter into this WMP and that they have taken all actions required by the respective parties' procedures, by-laws or applicable law to exercise that authority, and to lawfully authorize the undersigned signatory to execute this WMP and bind the party to its terms and conditions. The persons executing this WMP on behalf of the parties warrant that such person have full authorization to execute this WMP.

SandRidge Exploration and Production, LLC

By: 

Paul D McKinney,
President & CEO

11-12-2019

Date

Colorado Parks & Wildlife

By: 

J. T. Romatzke,
NW Regional Manager

11-22-19

Date

Effective Date: _____

Expiration Date: _____

WILDLIFE MITIGATION PLAN

- NORTH PARK -

SandRidge E&P, LLC

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II. Introduction

This Wildlife Mitigation Plan (“WMP”) was developed in consultation with Colorado Parks and Wildlife (“CPW”) staff for SandRidge E&P LLC’s (SandRidge) North Park, Jackson County, Colorado proposed area of development. This WMP agreement satisfies the consultation requirements of Rule 1202 for new and amended oil and gas locations within Sensitive Wildlife Habitat (“SWH”) and Restricted Surface Occupancy (“RSO”) areas. The general operating requirements under Rule 1203 are incorporated by reference into this WMP document.

SandRidge and CPW will meet to review this WMP agreement annually, in March. However, discussions of development activity or changes in species distributions and habitats considered in this WMP analysis may occur prior to the annual review process. SandRidge will provide updates, either verbal or informal summaries, as they relate to current wildlife and natural resource actions, including reclamation, weed monitoring and control, on-site biological reports, and any biological pre-construction survey results for review by CPW during the annual WMP meeting. The Bureau of Land Management (“BLM”) may also request to review any applicable information as well. However, SandRidge may choose to not relinquish any data to CPW, BLM, or the Colorado Oil and Gas Commission (“COGCC”) that is not public information.

SandRidge, any subcontractor, or agent, will apply to CPW for a scientific collection permit if wildlife sampling is sought on lands and waters contained within the North Park WMP boundary. SandRidge will work with CPW and private landowners to assist with gaining access for wildlife monitoring and survey efforts on private lands, if necessary.

Development Background and Context

SandRidge acquired approximately 136,000 acres of oil and gas leasehold, associated oil and gas well sites, central tank batteries (“CTBs”), and infrastructure in North Park in December 2015 from EE3, LLC. CPW staff has worked with SandRidge since their arrival to develop management practices that effectively avoid, minimize, and mitigate impacts to wildlife. Specifically, SandRidge and CPW have worked cooperatively during the CPW consultation process for individual Form2A permits issued by COGCC, and during federal APD review processes conducted by the BLM. The goal of this plan is to rise above site specific individual permit consultations and transition to a landscape-scale mitigation strategy to more effectively protect the wildlife resources of North Park.

CPW understands that oil and gas development typically progresses through several different stages of activity; generally recognized as exploratory, development and production, infill or full field development, and reclamation and abandonment. Each phase of development has distinctive operational needs and constraints; also, each phase of development has differing levels of human activity and impacts to wildlife and habitats, with cumulative impacts occurring throughout the life of the development. The development timeline for each stage is variable and dependent upon many factors, with the production phase potentially lasting for decades.

Currently, SandRidge is working on drilling, completing, and producing exploratory wells within North Park. It is expected that this phase will last through the next five years with a gradual transition to infill and full field development activities. Amendments and/or extensions to this plan are expected to include revisions as activities switch from one phase to another. This plan is not intended to be static in nature, but instead a living document that can be revised to best suit the needs of SandRidge and CPW as conditions warrant.

The target play for SandRidge in the North Park Basin are multiple benches within the Niobrara formation. CPW understands that development strategies for this resource play will cause wildlife disturbances, but also provide opportunities for avoiding, minimizing, and mitigating impacts to wildlife. SandRidge continues to work with CPW to refine development techniques to reduce their overall disturbance footprint. This has included measures such as: centralized tank batteries to reduce trucking traffic across the basin, reutilization of existing well pads, clustering development near CO Highway 14, seasonal timing restrictions for sensitive wildlife seasons, daily traffic restrictions, etc.

Geographic Area of Development

The North Park WMP boundary contains 156 square miles located entirely within Jackson County, Colorado. This area of North-central Colorado is primarily comprised of high-elevation (approximately 8,000 to 8,500 ft.) sage-brush dominated uplands, stream-fed wetland and riparian areas, and agricultural pasture land and hay fields (see Map 2). The primary water drainage within the WMP is Grizzly Creek and its many tributaries. This drainage joins with the North Platte River near the northern end of the WMP boundary. The WMP encompasses 100,074 acres, with approximately 37,700 acres (37.7%) of BLM surface, 6,500 acres (6.5%) of National Wildlife Refuge, 2,300 acres (2.3%) of CO State Land Board ("SLB") State Trust Lands, and 53,600 acres (54%) of private ownership (see Map 3). Colorado Highway 14 runs north-south through the center of the WMP boundary, with numerous Jackson County and BLM roads providing additional access throughout the area. SandRidge maintains three federal leasing units within North Park: the Peterson Ridge Unit, Beaver Creek Unit, and Surprise Unit (see Map 1). Additionally, SandRidge has multiple surface-use agreements that have been negotiated with private landowners.

North Park contains highly productive wildlife habitats which support large populations of big-game, greater sage-grouse ("GrSG"), native and introduced sport-fish species, mid to large carnivores, small mammals, waterfowl, and other migratory birds including numerous birds of prey. Hunting, angling, and wildlife watching are extremely popular in this area and contribute significantly to the local economy each year. Specifically, hunting and fishing were shown to directly or indirectly support more than 12% of all local jobs in Jackson County (BBC Research & Consulting, 2008). Additionally, North Park contains the second largest population of GrSG in Colorado, a Tier 1 species of conservation concern for CPW (2015 Colorado State Wildlife Action Plan), and currently scheduled for a species status review by the U.S. Fish and Wildlife Service in 2020.

III. Development Planning to Protect Wildlife Resources

Development Activity

Projections for SandRidge's future development scenarios in North Park are difficult to determine due to current regulatory and resource uncertainties. Historically, during the development of a WMP, CPW has required the operator to provide locations of planned well pads, CTBs, access roads, pipelines, electrical lines, etc. upfront to ascertain what the expected wildlife impacts would be. SandRidge has provided CPW with their best approximation of planned well pads and CTBs for the next 5 years of development. Additionally, SandRidge agrees to continually share information regarding new facilities informally with CPW staff, as it becomes available.

CPW and SandRidge have developed a strategy to avoid, minimize, and mitigate wildlife impacts based on geospatial features and known wildlife habitats within the WMP boundary. It is important to note that SandRidge does not expect to operate more than one active drilling rig during this timeframe; however, additional rigs are possible depending on market conditions and other variables. For the sake of this agreement, the scope of expected oil and gas activities and infrastructure includes: new well pads and lease roads, new wells from existing pads, associated water, oil, and gas pipelines, centralized tank batteries, loading and unloading stations, compressor stations, gas-to-liquid skids, mobile refrigeration units, equipment storage locations, produced water disposal wells, and other infrastructure resulting in a surface disturbance (collectively "facilities"). SandRidge will place necessary production equipment on the pad sites; the typical equipment placed on a well pad includes pump jacks, jet pumps or electric submersible pumps, separators, meter houses, water/oil/condensate tanks (*if centralized tank battery is not available*), and gas combustor(s), when necessary.

SandRidge utilizes existing water rights for surface water to conduct its drilling and completions activities. This water is accessed from agricultural diversions or Grizzly Creek and generally pumped via surface lines to the necessary pad locations. SandRidge contributes to the [South Platte Water Related Activities Program](#) (SPWRAP) to offset water usage from oil and gas activities.

General Development Practices

When analyzing the effects of oil and gas development on wildlife, CPW considers both direct impacts and indirect impacts that can occur from a proposed activity. Potential impacts to wildlife can occur from the direct conversion of habitat into roads and well pads, or from decreases in habitat functionality due to increased noise, light, traffic, and infrastructure on the landscape, resulting in indirect disturbances. When developing strategies for oil and gas operators to protect and conserve wildlife resources, CPW follows the mitigation hierarchy of avoid, minimize, and mitigate. It is often the least expensive alternative for industry and most beneficial to wildlife to avoid potential impacts from the start. CPW recommends avoiding

facilities within the highest priority habitat areas and in areas that cannot be replaced (e.g. GrSG lek sites). Not all wildlife habitats can be fully avoided; therefore, measures to minimize impacts in these habitats must be considered. Minimization techniques come in the form of best management practices and include measures such as site analysis and selection in coordination with CPW, seasonal timing restrictions, noise and light minimization, traffic reduction, etc. Finally, where residual impacts remain and cannot be fully avoided or minimized, compensatory mitigation should be used to create a “net benefit” scenario for wildlife. The following sections describe the agreements between CPW and SandRidge to follow the mitigation hierarchy for oil and gas activities within the North Park WMP.

Avoidance

Based on CPW’s wildlife habitat mapping and annual wildlife surveys, the highest priority habitats have been identified as full avoidance areas within the WMP boundary. These habitats consist of active GrSG lek locations and the Case Flats GrSG congregation area (see Map 4). SandRidge has agreed to a 1-mile avoidance buffer around active lek locations. An active lek is one that has been used by male GrSG within the last 5 years. Utilizing a one-mile avoidance buffer around active lek locations is consistent with the management direction of the BLM’s 2015 Northwest Colorado Greater Sage-Grouse Approved Resource Management Plan Amendment (*depending on the results of on-going litigation concerning the 2019 NW Colorado GrSG RMP Amendment, this WMP agreement may be amended at a future date to be consistent with the 2019 plan*). This buffer distance is intended to protect the functionality of the strutting ground and the immediate nesting habitat surrounding the lek site. The Case Flats grouse congregation area was discovered by CPW staff while conducting GrSG research in the North Park Basin. For unknown reasons, GrSG from the entire basin congregate in large numbers at this location each year during late winter/early spring. Due to the apparent importance of the site for grouse, it is being considered a full avoidance area within the WMP. SandRidge agrees to prohibit construction of all new facilities within these delineated areas. Avoiding these areas will maintain their effectiveness for wildlife and is the most important step of the mitigation hierarchy.

Minimization

Following the avoidance measures outlined above, the next step in protecting wildlife resources is to minimize potential unavoidable impacts to the maximum extent practicable. CPW and SandRidge have negotiated best management practices that will be applied to all oil and gas operations and facilities to minimize adverse impacts resulting from traffic, noise, artificial light, noxious weeds, etc. A list of field-wide BMPs (see Appendix C) will be implemented by SandRidge for operations within all areas of the WMP. Additionally, species-specific BMPs are also outlined to address concerns within certain habitat areas. These may include measures such as seasonal timing restrictions for construction, drilling, and completions, daily timing limitations for well site visits, noise and light minimization techniques, wildlife-friendly reclamation practices, reduced traffic speeds, etc. The application of these species-specific BMPs is determined by spatial factors including the presence of specific wildlife habitats and

the proximity to Highway 14. The areas where these BMPs are to be applied have been delineated on Maps 5-7 of Appendix B. SandRidge agrees to include the relevant BMPs with each newly submitted Form2A permit to COGCC. To further simplify this process, CPW and SandRidge have agreed to specific BMP lists that will be applied within each spatial area defined by the plan (see Appendix C).

In addition to best management practices to minimize impacts, SandRidge has agreed to track the density of oil and gas facilities and the average surface disturbance (*production phase*) per square mile. Research has indicated that habitat effectiveness for species such as GrSG, mule deer, and pronghorn antelope decreases when oil and gas facilities exceed one per square mile (Holloran, 2005; Hebblewhite, 2008; Sawyer et al., 2017). Well pad densities will be calculated as the number of existing well pads and CTBs per square mile, averaged across the entire WMP boundary (see Appendix E). Additionally, the total surface disturbance from well pads (drilling locations and CTBs) and new access roads will be tracked and averaged across the WMP as acres of disturbance per square mile. This method will help identify and track the cumulative impacts of oil and gas activities within the operating area. SandRidge will provide the number of new facilities constructed and their associated disturbance footprints, as well as any reclamation that has occurred throughout the year, to CPW staff during the annual WMP meeting. Each year Appendix E will be updated with any newly constructed locations or reclamation to reflect the most current levels of surface disturbance and average facility densities within the WMP boundary.

IV. Compensatory Mitigation for Unavoidable Impacts

After all measures have been taken to avoid and minimize impacts to wildlife and their habitats, there will still be residual impacts from oil and gas activities that cannot be fully avoided or minimized. These impacts to wildlife and their habitats can eventually result in population-level effects on species' abundance and distributions. To offset these residual impacts, it is recommended that oil and gas operators conduct compensatory mitigation projects commensurate to the level of impact resulting from their operational activities.

On December 19, 2018 former Governor of Colorado, John Hickenlooper, signed Executive Order D 2018-036. This document directs the Colorado Department of Natural Resources and its divisions (including CPW) to *"use their full authority to apply the mitigation hierarchy (avoid, minimize, and mitigate), including requiring compensatory mitigation when residual adverse impacts to wildlife resources, including greater sage-grouse or its habitat, occur."* Through the negotiation process for this WMP, CPW has worked with SandRidge to develop the following system for calculating and applying compensatory mitigation for construction of new facilities, expansions of existing facilities, and for granting exceptions and waivers to wildlife timing restrictions associated with previously permitted locations.

Compensatory Mitigation for New Disturbance

To fully offset the residual impacts of facilities, there must be a way of calculating what those impacts are. In 2017 the [Colorado Habitat Exchange, Inc.](#) released the Greater Sage-grouse [Habitat Quantification Tool](#) (“HQT”). This tool was developed over the course of several years by a science team consisting of leading GrSG biologists and habitat researchers. It provides of a scientifically defensible multi-scale approach for assessing impacts and benefits to greater sage-grouse habitats. This tool represents the best available science for calculating impacts to GRSG habitat. Accordingly, CPW and SandRidge have agreed to utilize this tool for calculating the overall unavoidable impacts for each newly proposed facility within the WMP boundary. Additionally, expansions of existing facilities outside of the original disturbance footprint would be analyzed with the HQT to determine the necessity for compensatory mitigation. This tool does not account for impacts to other species such as mule deer and pronghorn; however, currently the primary species of concern in North Park is GrSG, and habitat improvement efforts for GrSG should benefit most other sagebrush-dependent species as well.

The HQT takes into account several factors including a location’s proximity to existing disturbances, distance to the nearest GrSG lek locations, quality of existing seasonal habitats, and the size of the access road and proposed facility. Through a geospatial analysis and subsequent calculations, the tool quantifies the impact to wildlife habitat in functional acres based on the proposed activity. The number of functional acres impacted will then be used to calculate a total monetary value for compensatory mitigation at a rate of \$200 per functional acre (*see below*). The maximum amount of compensatory mitigation per location would be \$50,000 for facilities within the Highway 14 no stipulation buffer zone (*see Map 5*) and \$150,000 for locations outside of the buffer zone.

$$\text{HQT Functional Acre Impact} \times \$200 = \text{Mitigation Payment Due to CPW}$$

SandRidge has agreed to deposit \$50,000 annually each year of this plan into their mitigation account held by CPW. As new facilities are constructed, the necessary amount will be deducted from this initial deposit. If SandRidge exceeds \$50,000 in mitigation requirements for any given calendar year, they will contribute additional funds, as needed. If the mitigation requirements for the calendar year fall short of \$50,000, CPW will retain the remainder within the mitigation account. Mitigation requirements and payments will be tracked using the mitigation tracking spreadsheet (*see Appendix D*). Yearly mitigation contributions and requirements will be discussed and finalized during the annual WMP meetings.

CPW staff will be responsible for identifying habitat enhancement projects and coordinating with land managers in North Park to effectively off-set impacts to GrSG and other impacted species. Projects may include such things as: conservation of existing habitats, vegetation treatments, reclamation of previously disturbed habitats, research needs, and equipment for field personnel. All mitigation funds will be utilized within the North Park Basin, but not necessarily within the WMP boundary. CPW staff will provide updates annually during the scheduled WMP meetings regarding the amount of mitigation funds in the account and projects that have been completed, underway, or are planned as compensatory mitigation.

Wildlife Stipulation Exclusion Areas

Colorado State Highway 14 (“HWY 14”) runs north-south approximately through the middle of the WMP boundary area. According to the best available science, major roads have a significant indirect impact of approximately 1 mile (1.5 km), with residual indirect impacts occurring up to 2.6 miles (4.2km) from the roadway (Colorado Habitat Exchange, 2017). These are in addition to the direct disturbance of the roadway itself. One of the best ways to minimize and mitigate new projects is to incentivize those projects to be collocated with pre-existing disturbances. This creates overlapping direct and indirect impacts and reduces new impacts in undisturbed areas.

In order to incentivize new oil and gas development in close proximity to HWY 14, CPW and SandRidge agree to a “No Wildlife Timing Stipulation Zone” around HWY 14. This zone was achieved by applying a customized (approximately 1 mile) buffer to HWY 14 and removing most sensitive habitat timing stipulations (e.g. GrSG breeding and big game winter range) from that buffer (Map 5).

New facilities developed within this buffer will not be subject to GrSG breeding and big game winter timing stipulations (i.e. daily or seasonal development restrictions) and will have a compensatory mitigation cap of \$50,000 per location.

Mitigation for Granting Exceptions and Waivers to Existing Wildlife Stipulations

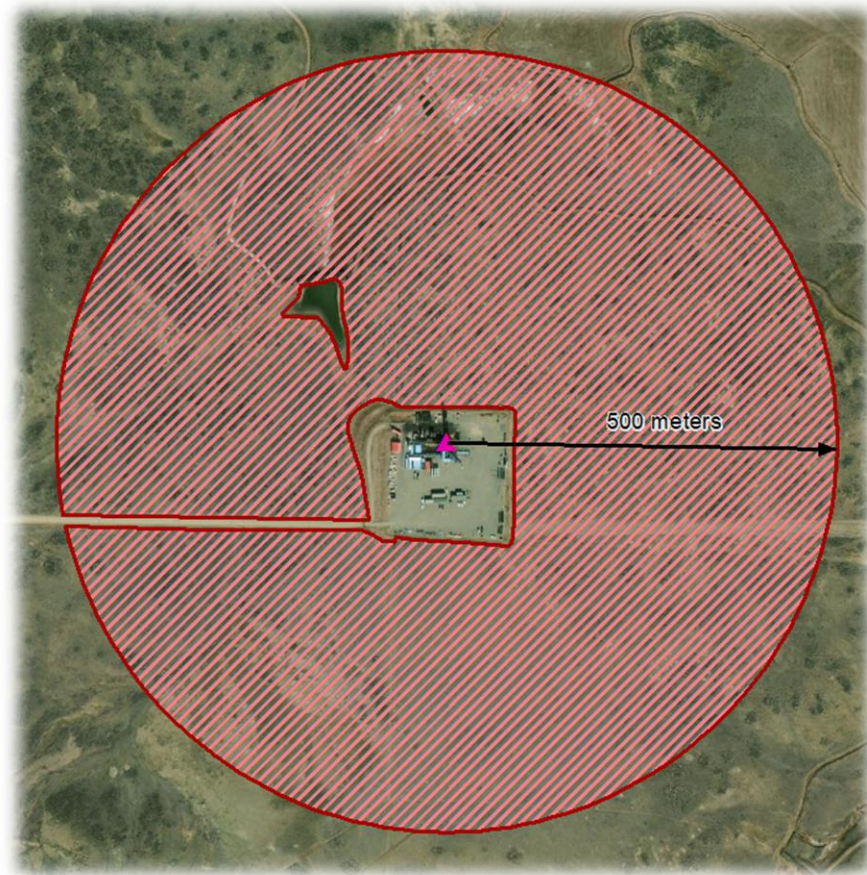
Most of the existing oil and gas locations in North Park contain seasonal and/or daily wildlife timing restrictions on their State-issued permits. Additionally, many new locations within the WMP will also contain the same restrictions. CPW understands that there are situations that may arise where it would be difficult for SandRidge to adhere to the timing restrictions associated with a given location. Numerous factors including adverse weather conditions, equipment malfunctions, etc. can contribute to scheduling conflicts. Emergency situations that could have environmental impacts are excluded from stipulations. In instances where SandRidge needs to ask for an exception or waiver to an existing wildlife stipulation the following process outlines the procedure for how these exception or waiver requests will be assessed.

SandRidge agrees to contact CPW at least 20 days in advance of needing an exception to an existing wildlife stipulation. CPW maintains the right to deny the request if severe adverse impacts to wildlife are anticipated. If CPW is amenable to allowing the exception request, compensatory mitigation will be calculated to ensure that the resulting impacts to wildlife are fully mitigated. Additionally, it is SandRidge’s responsibility to submit the necessary sundry request forms to COGCC and avoid violating any BMPs and/or COAs associated with existing permits. Upon approval of the exception request, CPW agrees to provide written concurrence to COGCC at the time of the sundry request.

The following process will be utilized to calculate compensatory mitigation for an exception or waiver request to a wildlife timing stipulation:

1. Buffer the existing location (*from well heads*) by 500 meters (*based on the Colorado Habitat Exchange's disturbance distance for active oil and gas facilities developed and utilized by the Habitat Quantification Tool*)
2. Manually remove non-habitat areas from within the 500 meter buffer area (*i.e. water bodies, existing oil and gas facility footprints, agricultural stack yards, etc.*)
3. Calculate the resulting acreage within the modified buffer polygon
4. Multiply this acreage by \$200 to obtain the final mitigation requirement (*see Figure 1*)

Figure 1:



This example demonstrates a 500 meter buffer of an existing location with non-habitat areas clipped out of the buffered polygon. The resulting area is 183 acres. This would be multiplied by \$200 for a total mitigation requirement of \$36,600 to allow a waiver to the timing stipulation.

These methods for calculating, implementing, and tracking compensatory mitigation are meant to off-set the residual impacts from oil and gas activities within the WMP boundary to the

maximum extent possible. As described earlier, every effort will be made to first avoid and minimize adverse impacts to wildlife and lastly, utilize compensatory mitigation as the final step to alleviate any remaining impacts.

V. Surface Ownership & Agreements for Implementation

Permitting of oil and gas facilities within Colorado varies depending on land ownership. For facilities on private property accessing private minerals, the COGCC has jurisdiction to approve permits including the Form2A location assessment for newly constructed facilities. Under rule 1202.d.(2), this wildlife mitigation plan shall replace the need for individual CPW wildlife consultations for newly proposed facilities. At this time, existing COGCC rules and regulations are scheduled for rule-making changes over the next one to two years as a result of the passage of Colorado Senate Bill 181 (SB-181). If changes to COGCC rules and regulations affect portions of this plan, an amendment may be necessary to address those changes and conform to future rules and permitting processes.

For facilities located on federally-owned property or wells that plan to penetrate federally-owned minerals, the Bureau of Land Management and COGCC both have jurisdiction over permitting. The agreements made in this WMP attempt to achieve consistency with BLM wildlife stipulations, including the 2019 GrSG ARMPA and Kremmling Field Office's 2015 Resource Management Plan. CPW and SandRidge will continue working with the BLM to develop an agreement on how this WMP may be used during the federal oil and gas permitting process. If an agreement is made with BLM, that agreement shall be included as an appendix to this document, and described herein.

VI. Definitions & Literature Cited

Definitions:

The following list contains terms used (underlined within the plan) and their intended definitions to provide clarity and continuity within the North Park Wildlife Mitigation Plan.

Active Greater sage-grouse Lek - An open area usually located in low sagebrush where sage grouse traditionally display and breed. Leks may be classified in one of five ways according to Autenrieth et al. 1982: active, inactive, primary, complex, and satellite. Active leks are defined as those leks in which strutting male grouse have been observed in two of the previous five years.

Best Management Practices (BMPs) – Operational measures that are designed to prevent or reduce impacts caused by oil and gas operations to air, water, soil, or biological resources, and to minimize adverse impacts to public health, safety, and welfare, including the environment and wildlife resources.

Direct Impacts – The direct loss of habitat that occurs from the construction of oil and gas facilities and infrastructure (*i.e. the resulting “footprint” of constructed facilities*).

Exception Request – For the sake of this WMP, an exception shall mean the one-time removal of an existing wildlife stipulation for an already permitted oil and gas facility. The stipulation would still remain for the life of the location following the one-time exception.

Facilities – The term used for: new well pads and lease roads, new wells from existing pads, associated water, oil, and gas pipelines, centralized tank batteries, loading and unloading stations, compressor stations, gas-to-liquid skids, mobile refrigeration units, equipment storage locations, produced water disposal wells, and other infrastructure resulting in a surface disturbance.

Indirect Impacts – A measurement of the decrease in habitat effectiveness that results from nearby oil and gas activities. Often a result of increased noise levels, artificial lighting, traffic, human presence, or tall structures near wildlife habitats. Additionally, fragmentation of habitat by roads and pipelines decreases permeability for wildlife and leads to indirect impacts for species utilizing these areas.

RSO - Restricted Surface Occupancy Areas

- Rocky mountain bighorn sheep production areas;
- Desert bighorn sheep production areas;
- Areas within 0.6 miles of any greater sage-grouse, Gunnison sage-grouse, and lesser prairie chicken leks (strutting and booming grounds);
- Areas within 0.4 miles of any Columbian sharp-tailed grouse or plains sharp-tailed grouse leks (strutting grounds);
- Areas within 1/4 mile of active bald eagle nest sites, golden eagle nest sites, or osprey nest sites;

- Areas within 1/2 mile of active Ferruginous hawk nest sites, northern goshawk nest sites, peregrine falcon nest sites, or prairie falcon nest sites;
- Areas located within 300 feet of the ordinary high-water mark of any stream segment located within designated cutthroat trout habitat; and
- Areas within 300 feet of the ordinary high-water mark of a stream or lake designated by Colorado Parks and Wildlife as “Gold Medal.”

Maps showing and spatial data identifying the individual and combined extents of the above habitat areas shall be maintained by the Colorado Oil and Gas Conservation Commission and made available on the Commission website: <http://cogcc.state.co.us/>

SWH - Sensitive Wildlife Habitats

- Mule deer critical winter range (being both mule deer winter concentration areas (that part of the winter range where densities are at least 200% of the surrounding winter range density during the same period used to define winter range in 5 out of 10 winters), and mule deer severe winter range (that part of the winter range where 90% of the individuals are located during the average 5 winters out of 10 from the first heavy snowfall to spring green-up)) (west of Interstate 25 and excluding Las Animas County);
- Elk winter concentration areas (west of Interstate 25 and excluding Las Animas County);
- Pronghorn antelope winter concentration areas (west of Interstate 25);
- Bighorn sheep winter range;
- Elk production areas (being that part of the overall range occupied by the females for calving) (west of Interstate 25 and excluding Las Animas County);
- Columbian sharp-tailed grouse and plains sharp-tailed grouse production areas (being an area that contains 80% of nesting and brood rearing habitat for any identified population);
- Greater sage-grouse and Gunnison sage-grouse production areas (being an area that contains 80% of nesting and brood rearing habitat for any population identified in the Colorado Greater Sage-Grouse Conservation Plan (CDOW, 2008) or the Gunnison Sage-Grouse Range-Wide Conservation Plan (May 2005), respectively);
- Lesser prairie chicken production areas (being an area that includes 80% of nesting and brood rearing habitat);
- Black-footed ferret release areas;
- Bald eagle nest sites and winter night roost sites; and
- Golden eagle nest sites.

Maps showing GIS spatial data identifying the individual and combined extents of the above habitat areas shall be maintained by the Colorado Oil and Gas Conservation Commission and made available on the Commission website: <http://cogcc.state.co.us/>

Waiver – For the sake of this WMP, a waiver shall mean the permanent removal of a wildlife stipulation from an oil and gas location. Different from an exception, which is a request for a one-time removal of the existing wildlife stipulation.

Well Pad – The area that has been cleared of vegetation and leveled for a drilling rig to work on. Typically, after drilling and completions activities have been completed, much of the disturbed area is reclaimed for the production phase of the well(s). Final reclamation of the pad is conducted after production has ceased.

Literature Cited:

- Autenrieth, R., W. Molini, and C. Braun. 1982. Sage grouse management practices. Western States Sage Grouse Committee Technical Bulletin 1. Twin Falls, Idaho, USA.
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APPENDIX A

Record of Modifications

SandRidge E&P, LLC
- North Park -
Wildlife Mitigation Plan

Attached to this Appendix is a history of the modifications to the SandRidge E&P, LLC North Park Wildlife Mitigation Plan. Below is a sample modification form to be used by CPW and SandRidge E&P, LLC. The effective date is the date by which both parties have signed the modification form.

Sample Modification Form

SandRidge E&P, LLC and Colorado Parks and Wildlife agree upon the following modification(s) to the North Park Wildlife Mitigation Plan:

[INSERT REVISION PAGES AS NECESSARY]

SandRidge E&P, LLC

Date

Colorado Parks and Wildlife

Date

APPENDIX B

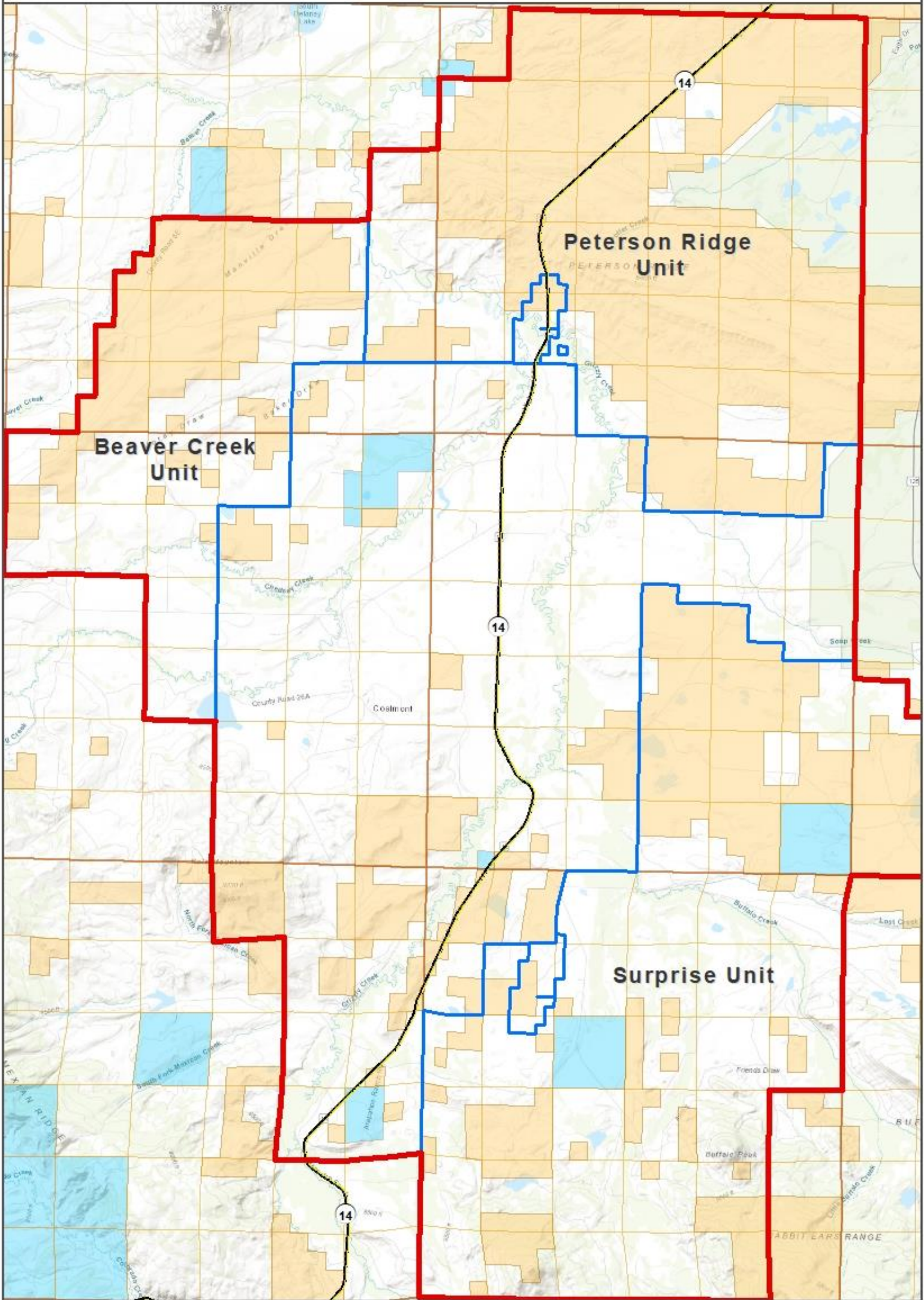
Spatial Mapping

SandRidge E&P, LLC - North Park - Wildlife Mitigation Plan

The following figures were developed using GIS spatial data from SandRidge E&P, LLC and Colorado Parks and Wildlife. Maps one through eight depict the geographic area of the plan, surface ownership information, wildlife exclusion areas, areas for determination of stipulations, and extent of existing facilities and roads.

SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 1: WMP Boundary and Federal Units



Wildlife Mitigation Plan Boundary
SandRidge Unit Boundaries



Bureau of Land Management
CO State Land Board

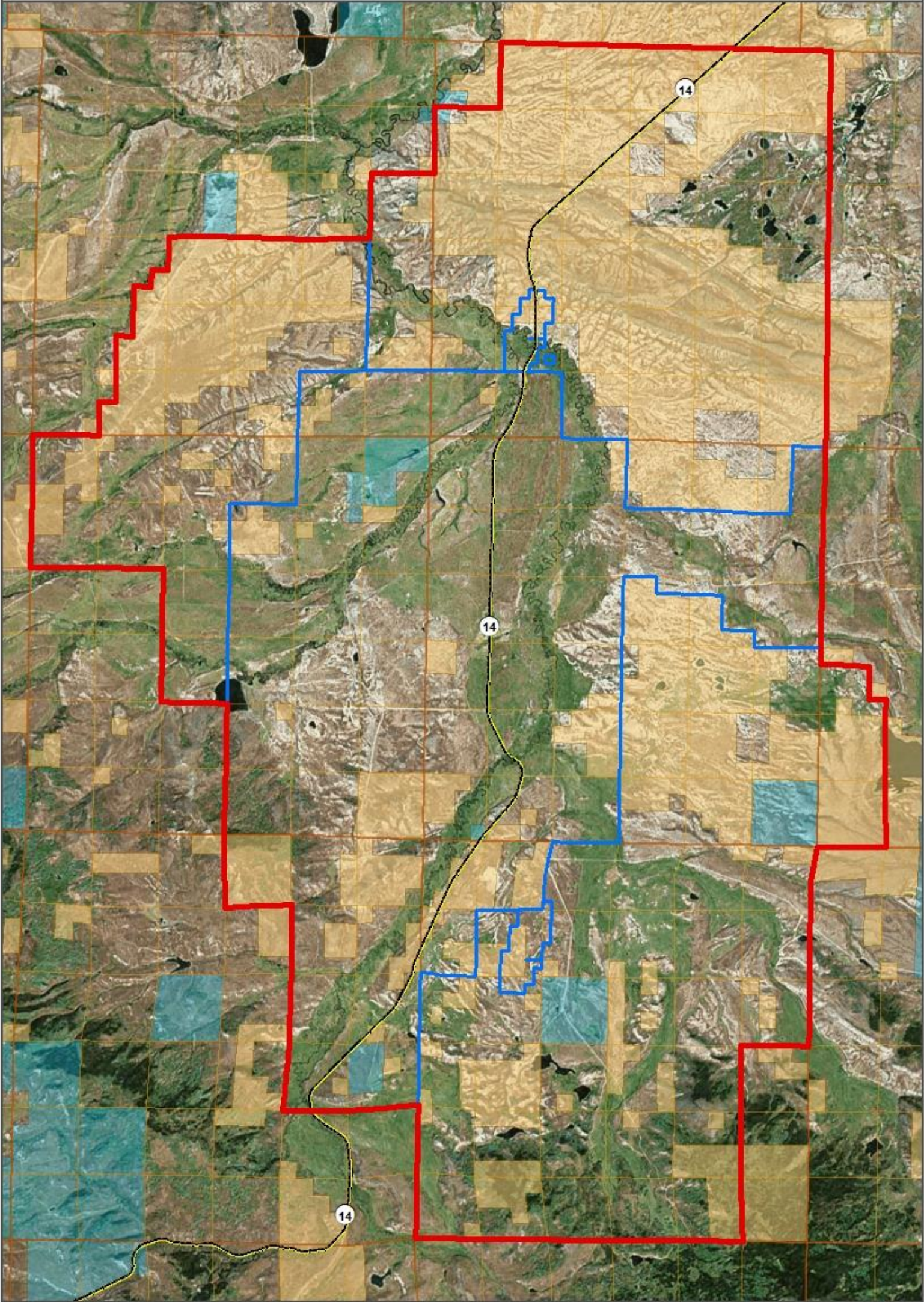


Mapping by CPW and SandRidge E&P - August 2019



SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 2: Aerial Imagery with WMP Boundaries



Wildlife Mitigation Plan Boundary

SandRidge Unit Boundaries



Bureau of Land Management

CO State Land Board

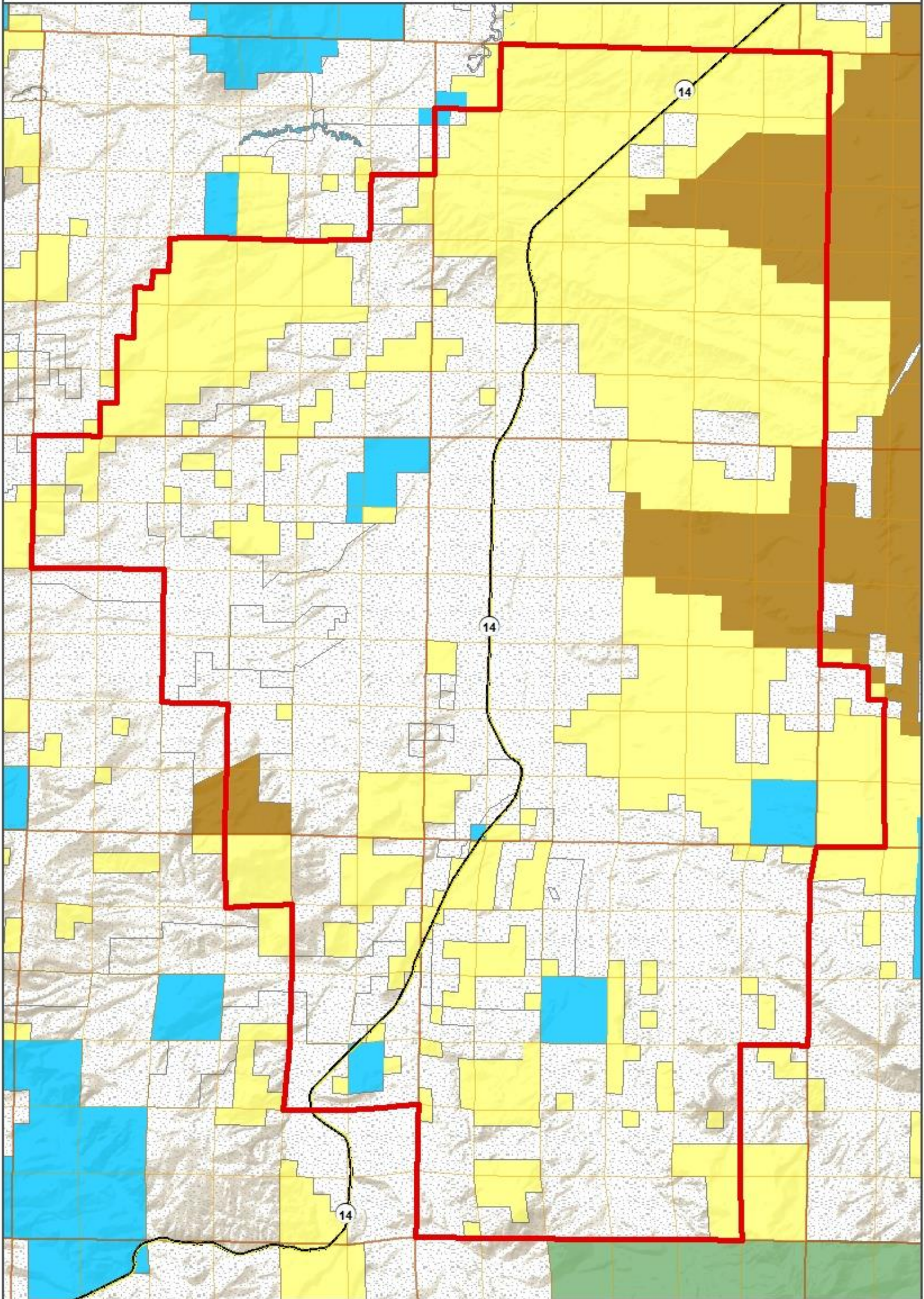


0 1.5 3 Miles
Mapping by CPW and SandRidge E&P - August 2019



SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 3: Land Ownership Status



- COMaP Property Ownership**
- PRIVATE
 - US Forest Service
 - State
 - Bureau of Land Management
 - Fish and Wildlife Service



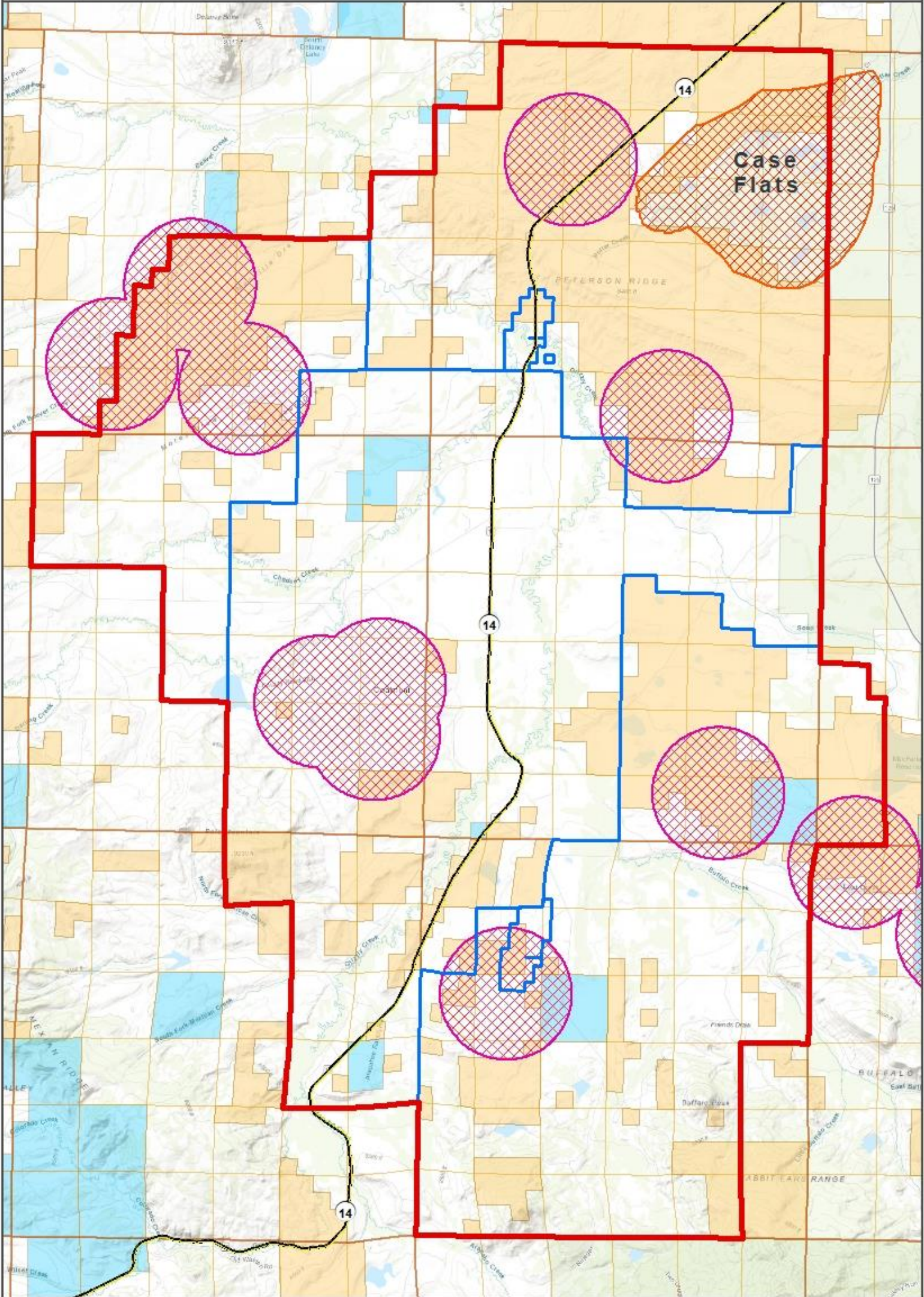
0 1.5 3 Miles

Mapping by CPW and SandRidge E&P - August 2019



SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 4: GrSG Lek Buffers & Case Flats Avoidance Areas



-  Wildlife Mitigation Plan Boundary
-  SandRidge Unit Boundaries
-  Active Leks 1 Mile Buffer
-  Case Flats
-  Bureau of Land Management
-  CO State Land Board

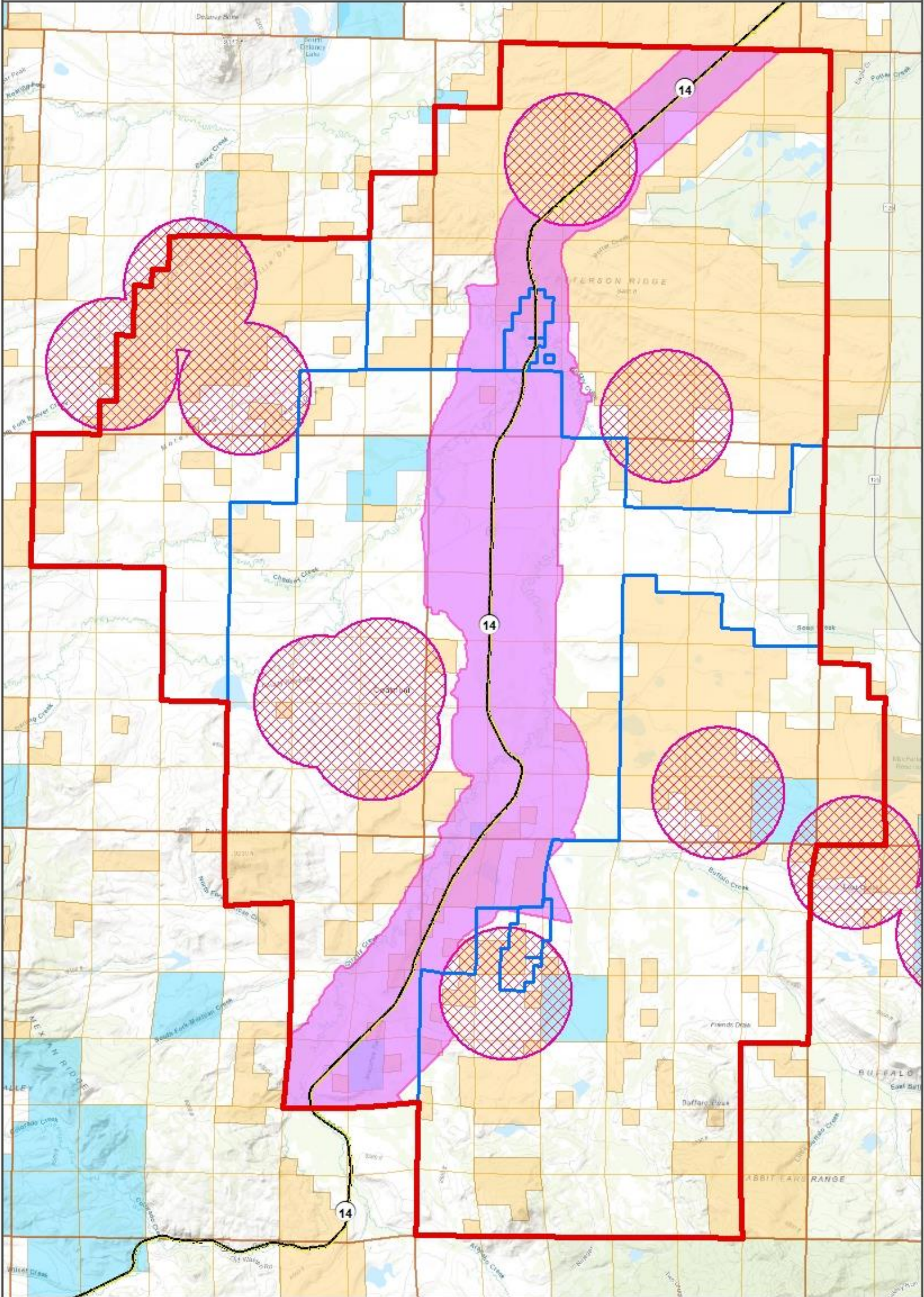


0 1.5 3 Miles
Mapping by CPW & SandRidge E&P - August 2019



SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 5: GrSG Stipulation Exclusion Areas



- Wildlife Mitigation Plan Boundary
- SandRidge Unit Boundaries
- GrSG Stipulation Exclusion Area
- Active Leks 1 Mile Buffer
- Bureau of Land Management
- CO State Land Board



0 1.5 3 Miles

Mapping by CPW and SandRidge E&P - August 2019



Map 6: Big-game Winter Range Stipulation Areas

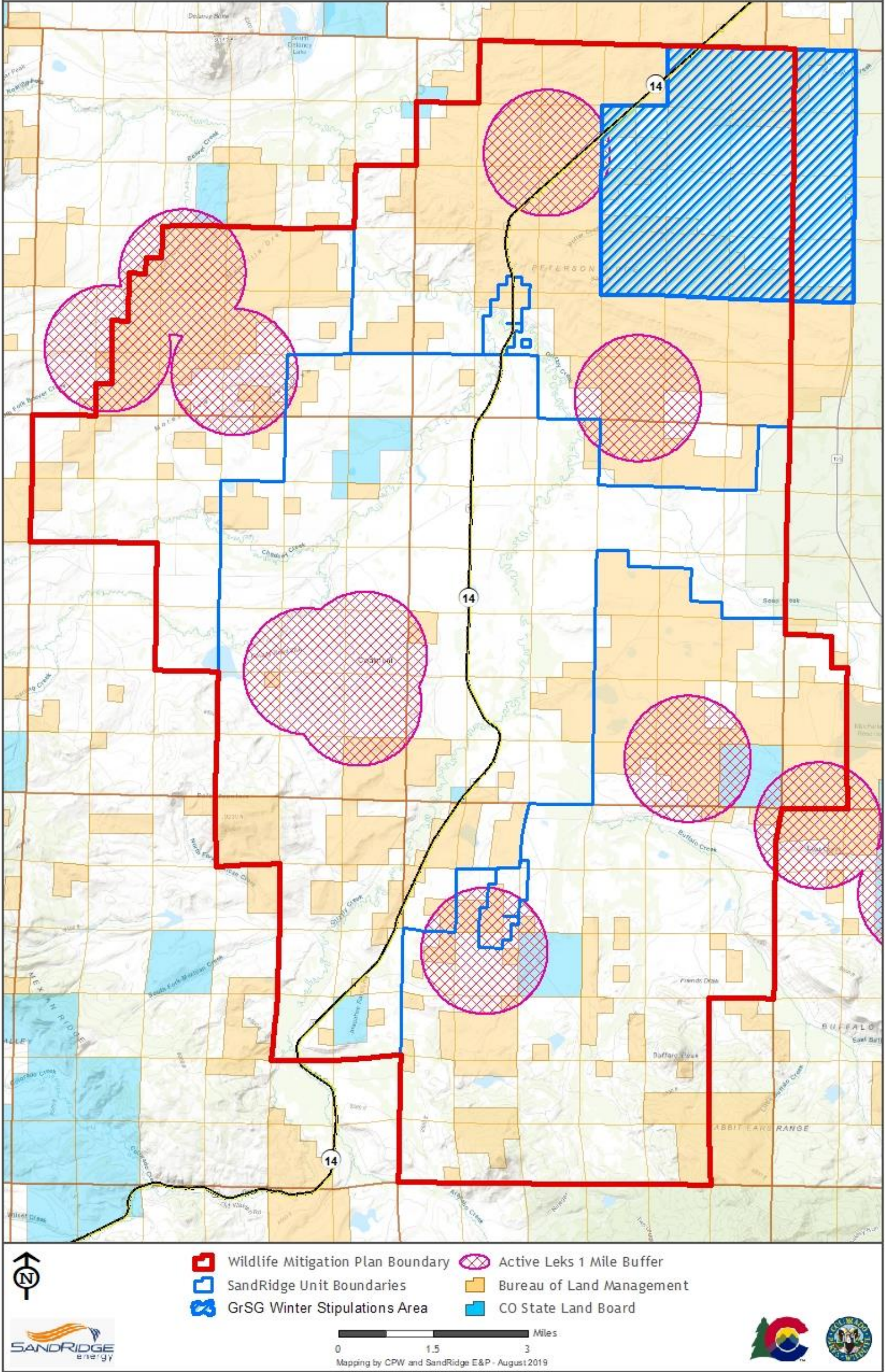


Mapping by CPW and SandRidge E&P - August 2019



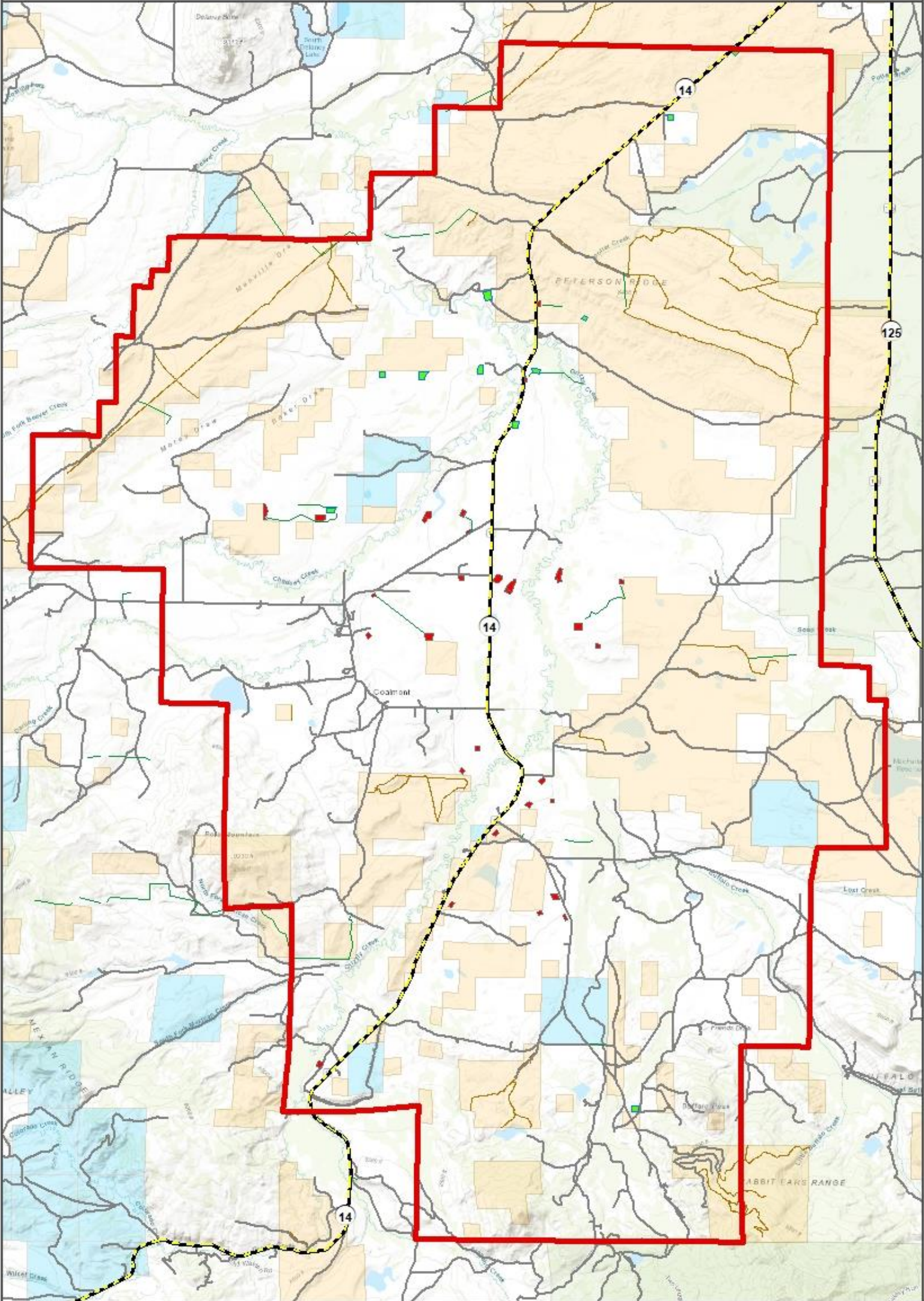
SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 7: GrSG Winter Stipulation Areas



SandRidge E&P, LLC - North Park Wildlife Mitigation Plan

Map 8: Existing Pad Locations & Roads



- Wildlife Mitigation Plan Boundary
- Proposed Lease Roads
- BLM Roads
- Jackson County Roads
- State Highways
- Pad Locations
- BUILT
- PROPOSED



0 1.5 3 Miles

Mapping by CPW and SandRidge E&P - August 2019



APPENDIX C

Best Management Practices & Stipulations

SandRidge E&P, LLC - North Park - Wildlife Mitigation Plan

The following pages contain best management practices (BMPs) for the SandRidge E&P, LLC North Park Wildlife Mitigation Plan. These BMPs were negotiated between Colorado Parks and Wildlife and SandRidge with the intent to avoid and minimize adverse impacts to wildlife resulting from oil and gas development. Standard field-wide BMPs will be implemented throughout the WMP boundary (Map 1) for all operations. The application of wildlife-specific BMPs (2 through 6) is dependent on the geographic location of the proposed facility in regards to mapped wildlife habitats (*see* Appendix B). Therefore, the following lists of BMPs contained herein will be provided to COGCC by SandRidge with each Form 2A application depending on the location of the proposed facility:

1. Master BMP List
2. Greater Sage-grouse Production Habitat Stipulation Areas
3. Greater Sage-grouse Winter Range Stipulation Areas
4. Greater Sage-grouse Stipulation Exclusion Areas
5. Big-game Winter Range Stipulation Areas
6. Big-game Winter Range & GrSG Winter Range Stipulations

SandRidge E&P, LLC
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Wildlife Mitigation Plan

Master BMP List

Standard Field-Wide Best Management Practices:

- *These BMPs will be applied throughout the Wildlife Mitigation Plan boundary, regardless of habitats present.*
- ❖ Preclude open flaring during the production phase (except in emergencies or rare circumstances where it might be necessary for short-term operations)
- ❖ Utilize central tank batteries (CTB) to consolidate truck hauling traffic to locations as near as practicable to Highway 14
- ❖ Limit the overall average density of oil and gas facilities to 1 facility per square mile (averaged across the entire WMP boundary area).
- ❖ Implement remote monitoring technologies (e.g. SCADA) to reduce well-site visitations to the minimum amount practicable
- ❖ Utilize electric submersible pumps (ESP) to the maximum extent practicable to reduce overall noise impacts within the WMP boundary
- ❖ To the maximum extent possible, co-locate roads, pipelines, and power lines within the same disturbance corridor to reduce overall surface disturbance
- ❖ Where surface owner agrees, construct any new necessary fencing to the wildlife friendly fencing design criteria found in CPW's Fencing with Wildlife in Mind Document (see Appendix F)
- ❖ Continue annual contributions to Jackson County's noxious weed control program for the life of the WMP
- ❖ At facilities where continuous artificial lighting is necessary, shield lighting and direct downward or away from sensitive wildlife habitats (e.g. lek locations)
- ❖ Implement wildlife-specific training programs for employees and contractors as necessary.
- ❖ Implement 25 mph speed limits on all lease roads (fee and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Where surface owner agrees, work with CPW to adaptively manage reclamation seed mixes to best suit the specific habitats present and wildlife species in specific areas
- ❖ Consult with CPW district wildlife managers and local biologists to avoid and minimize impacts to known raptor nest locations within the WMP boundary
- ❖ Reclaim location to what is reasonably needed for O&M within 12 months of cessation of drilling/after well completion. *(Unless a variance is agreed upon with CPW and COGCC)*

Greater Sage-Grouse:

- *Seasonal and daily breeding stipulations will not apply to agreed upon exemption areas along Highway 14 (Map 5)*
- ❖ Preclude new oil and gas development within 1 mile of any active greater sage-grouse lek
- ❖ Avoid locating facilities within the Case Flats greater sage-grouse congregation area mapped by CPW (Map 4)

- ❖ Within identified greater sage-grouse wintering areas (listed below and mapped in Map 7), oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and March 15th**
 - Township 8 North, Range 80 West
 - Sections 1,2,10,11,12,13,14,15,16,22,23,24
 - Township 8 North, Range 79 West
 - Sections 6,7,18,19
- ❖ Within greater sage-grouse production habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **March 1st and June 30th** (*unless location is in an area with no sage-grouse stipulations*)
- ❖ Within greater-sage-grouse production habitats, all operations and maintenance activities will be limited to between 9:00 am and 4:00 pm during the lekking, nesting, and early brood-rearing seasons (March 1st through May 15th). **EXCLUDING EMERGENCY SITUATIONS**
 - Emergency situations are those activities unexpectedly and urgently required to prevent or address immediate threats to human health, safety, or property; the environment; or national security
- ❖ Avoid noise levels above 75 dBA at the edge of pads and facilities closest to the nearest active lek. This BMP is only applicable when there is an active lek within 2 miles of the location.
- ❖ Implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens
- ❖ Where surface owner agrees, utilize CPWs wildlife friendly fencing guidelines (Appendix F) for any new fences within GrSG production habitat

Mule Deer, Elk, and Pronghorn Winter Ranges:

- *Seasonal and daily timing stipulations will apply to the big-game winter range habitats depicted in Map 6, allowing for a ½ mile exemption along Highway 14.*
- ❖ Within the WMP's mapped big-game winter range habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and April 15th**.
- ❖ Within the WMP's mapped big-game winter range habitats, all operations and maintenance activities will be limited to portions of the day between 10:00 am and 3:00 pm during the winter season (December 1st through April 15th). **EXCLUDING EMERGENCY SITUATIONS**

Aquatic Habitats Best Management Practices:

- ❖ Avoid new surface disturbance within 300 feet of any perennial waterway (naturally occurring) within the WMP boundary
- ❖ Avoid locating staging, refueling, and storage areas within 300 feet of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river
- ❖ Screen water intake hoses to prevent entrapment and impingement of aquatic organisms
- ❖ Inspect and disinfect all equipment that will contact a stream, spring or water body for cleanliness before commencing work to prevent the spread of disease, aquatic parasites, and invasive species. If heavy equipment arrives from offsite, ensure that the owner/operation provides SandRidge with documentation that the equipment was cleaned in accordance with one of the following CPW standards-

- Remove mud and debris from equipment and wet the equipment for a minimum of ten minutes with a solution containing: dialkyl dimethyl ammonium chloride (5-10% by weight), alkyl dimethyl benzyl ammonium chloride (5-10% by weight), nonyl phenol ethoxylate (5-10% by weight), sodium sesquicarbonate (1-5%), ethyl alcohol (1-5%), and tetrasodium ethylene diaminetetraacetate (1-5%), and water, or:
- Remove mud and debris from equipment and wet the equipment for a minimum of ten minutes with water at a temperature greater than 140° F. Consult with CPW on any new stream crossing structures to be constructed, or:
- Other methods to be approved by CPW before use.

Pipeline Siting and Construction BMPs:

- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails.
- ❖ During pipeline construction, open trenches will be inspected by SandRidge or their contractors at least once daily (in the morning) for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife.

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Greater Sage-grouse Production Habitat Stipulations

- ❖ Within Greater Sage-grouse production habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **March 1st and June 30th**
- ❖ *EXCLUDING EMERGENCY SITUATIONS*, within Greater-Sage-grouse production habitats, all operations and maintenance activities will be limited to between 9:00 am and 4:00 pm during the lekking, nesting, and early brood-rearing seasons (**March 1st through May 15th**)
- ❖ Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek. This BMP is only applicable when there is an active lek within 2 miles of the facilities (well pad, multi well pad, CTB, etc.)
- ❖ To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens
- ❖ With necessary surface owner consent, CPW's wildlife friendly fencing guidelines for any new fences within Greater Sage-grouse production habitat
- ❖ Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (O&M) within 12 months of cessation of drilling/after well completion, *unless new wells are scheduled on the same location or a variance is agreed upon with CPW and COGCC*
- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails
 - a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife

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Wildlife Mitigation Plan

Greater Sage-grouse Winter Range and Production Area Stipulations

- ❖ Within greater Sage-Grouse Production habitats, oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **March 1st and June 30th**
- ❖ *EXCLUDING EMERGENCY SITUATIONS*, within Greater Sage-Grouse production habitats, all operations and maintenance activities will be limited to between 9:00 am and 4:00 pm during the lekking, nesting, and early brood-rearing seasons (**March 1st through May 15th**)
- ❖ Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek. This BMP is only applicable when there is an active lek within 2 miles of the facilities (well pad, multi well pad, CTB)
- ❖ To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens
- ❖ With necessary surface owner consent, utilize CPW's wildlife friendly fencing guidelines for any new fences within Greater Sage-grouse production habitat
- ❖ Within identified Greater Sage-grouse wintering areas in Jackson Co., CO (listed below, and Map 7)), oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and March 15th**
 - a. Township 8 North, Range 80W
 - i. All of Sections 1,2,10,11,12,13,14,16,22,23, and 24; and
 - b. Township 8 North, Range 79 West
 - i. All of Sections 6,7,18, and 19
- ❖ Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (O&M) within 12 months of cessation of drilling/after well completion, *unless new wells are scheduled on the same location or a variance is agreed upon with CPW*
- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails
 - a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife

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Greater Sage-grouse Stipulation Exclusion Areas (Map 5)

- ❖ Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (O&M) within 12 months of cessation of drilling/after well completion, *unless new wells are scheduled on the same location or a variance is agreed upon with CPW*
- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails
 - a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife

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Big-game Winter Range Stipulation Areas

- ❖ Within mapped big-game winter range habitat (Map 6), oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and April 15th**
- ❖ *EXCLUDING EMERGENCY SITUATIONS*, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the winter season (**December 1st through April 15th**)
- ❖ Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek. This BMP is only applicable when there is an active lek within 2 miles of the facilities (well pad, multi well pad, CTB)
- ❖ To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens
- ❖ With necessary surface owner consent, utilize CPW's wildlife friendly fencing guidelines for any new fences within Greater Sage Grouse production habitat
- ❖ Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (O&M) within 12 months of cessation of drilling/after well completion, *unless new wells are scheduled on the same location or a variance is agreed upon with CPW and COGCC*
- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails
 - a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife

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Big-game Winter Range & GrSG Winter Range Stipulation Areas

- ❖ Within identified Greater Sage-grouse wintering areas in Jackson Co., CO (listed below, and Map 7), oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and March 15th**
 - a. Township 8 North, Range 80W
 - i. All of Sections 1,2,10,11,12,13,14,16,22,23, and 24; and
 - b. Township 8 North, Range 79 West
 - i. All of Sections 6,7,18, and 19
- ❖ Within mapped big-game winter range habitat (Map 6), oil and gas operations (construction, drilling, and completions) will be conducted outside the period between **December 1st and April 15th**
- ❖ *EXCLUDING EMERGENCY SITUATIONS*, all operations and maintenance activities will be limited to portions of the day between 9:00 am and 4:00 pm during the winter season (December 1st through April 15th)
- ❖ Avoid noise levels above 75 dBA at the edge of pads and/or facilities closest to the nearest active lek. This BMP is only applicable when there is an active lek within 2 miles of the facilities (well pad, multi well pad, CTB)
- ❖ To the maximum extent practicable, implement avian perch deterrents or design permanent facilities in a manner that does not provide nesting substrates for raptors, crows, or ravens
- ❖ With necessary surface owner consent, utilize CPW's wildlife friendly fencing guidelines for any new fences within Greater Sage-grouse production habitat
- ❖ Implement 25 mph speed limits on all lease roads (fee, state and federal lands) within the WMP boundary
- ❖ Follow COGCC Rule 1204. a. (1) for bear-proof trash receptacles and routine trash disposal at all permanent and temporary facilities
- ❖ Perform interim reclamation of well pads to what is reasonably necessary for operations and maintenance (O&M) within 12 months of cessation of drilling/after well completion, *unless new wells are scheduled on the same location or a variance is agreed upon with CPW and COGCC*
- ❖ During pipeline construction, for trenches that are left open for more than five (5) days and are greater than five (5) feet in width, install wildlife crossovers and escape ramps where the trench crosses well-defined game trails and at a minimum of one quarter (1/4) mile intervals where the trench parallels well-defined game trails
 - a. Open trenches will be inspected by SandRidge or their contractors at least once daily for any trapped wildlife. If necessary, local CPW staff will be contacted to assist in removing trapped wildlife