

Adam Tankersley

From: Slezak - DNR, Elissa <elissa.slezak@state.co.us>
Sent: Tuesday, May 26, 2020 7:36 PM
To: Adam Tankersley
Cc: Taylor Elm; Bill Devergie (Bill.Devergie@state.co.us); Jeff Kirtland; Brandon Sagrillo
Subject: Re: Lower Wagonroad Ridge Master Development Plan - CPW Review

Hi Adam,

CPW has reviewed the Lower Wagonroad Ridge Master Development Plan (LWRMDP), specifically the RG-41-18-297 pad, RGU 23-7-297 and Federal 299-23-3 pads.

CPW is supportive of TEP using and expanding existing pad sites in lieu of constructing entirely new pads, and utilizing existing roads, pipeline corridors and infrastructure to the greatest extent possible to minimize new disturbance to wildlife habitat. CPW also supports the planning and operational measures included in the LWRMDP and proposed Best Management Practices for these sites.

Since the RG-41-18-297 pad is scheduled to start drilling in late April during the Big Game Winter Range Timing Limitation of Dec 1-April 30, CWP requests to meet with TEP and the BLM WRFO (as soon as feasible per COVID restrictions) to discuss potential compensatory mitigation measures if the drilling start date can't be moved to after April 30. Additionally, CPW suggests that TEP consider the requirements associated with the new draft rules, including a Wildlife Protection Plan, to include with future Form 2A applications once the new rules are finalized.

Thank you for the opportunity to review these prior to the Form 2A applications. If possible, I'd like to schedule a site visit to familiarize myself with this area (maybe in June?) since I was not at the on-site consultations last July. Also, for some reason I was unable to download the shapefiles from the folder link, any chance you can send those to me in a zipfile so I have them for the Form 2A reviews?

Thanks and let me know if you have any questions,
Elissa

Elissa Slezak

Northwest Region Land Use Specialist
Colorado Parks and Wildlife



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On Tue, May 19, 2020 at 8:07 AM Adam Tankersley <ATankersley@terraep.com> wrote:

Good Morning Elissa,

We are planning to submit permits for the RG 41-18-297 pad on Tuesday of next week. If you could provide feedback my noon on Monday the 25th that would be greatly appreciated. We are only submitting the RG 41-18-297 pad next

week. The RGU 23-7-297 Pad and Federal 299-23-3 Pad will likely be submitted sometime next month. The other locations will likely be submitted a some point later this year.

Thanks,

Adam Tankersley | Planning Lead | TEP Rocky Mountain LLC | 1058 CR215 Parachute, CO 81635

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From: Slezak - DNR, Elissa <elissa.slezak@state.co.us>

Sent: Monday, May 18, 2020 5:14 PM

To: Adam Tankersley <ATankersley@terraep.com>

Cc: Taylor Elm <taylor.elm@state.co.us>; Bill Devergie (Bill.Devergie@state.co.us) <Bill.Devergie@state.co.us>; Jeff Kirtland <JKirtland@terraep.com>; Brandon Sagrillo <BSagrillo@terraep.com>

Subject: Re: Lower Wagonroad Ridge Master Development Plan - CPW Review

Hi Adam,

We appreciate the heads up on the upcoming permit applications. We'll review the draft LWRMDP materials and let you know if CPW has any feedback. How soon do you need it?

Elissa

Elissa Slezak

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On Thu, May 14, 2020 at 5:41 PM Adam Tankersley <ATankersley@terraep.com> wrote:

Good Afternoon Elissa,

TEP Rocky Mountain LLC (“TEP”) recently submitted the Lower Wagonroad Ridge Master Development Plan (“LWRMDP”) to the BLM (White River Field Office), which includes development of fifty-one (51) natural gas wells on three (3) existing well pads (RG 41-18-297 pad, RGU 23-7-297 pad and RGU 44-1-298 pad) and one (1) produced water disposal well (Federal RG 33-22-299) on the existing Federal 299-23-3 pad. Additionally, TEP would install additional facilities on the RGU 23-6-297 pad, construct a new Centralized Waste Management Facility (“CWMF”) for management of produced water, and construct a CWMF for drill cuttings disposal. Our development plan is outlined in more detail in the attached LWRMDP.

An onsite, with representatives from the BLM and CPW, was held for the project on July 15th, 2019 where the three (3) proposed well pads were reviewed. During initial planning for this project we reviewed the Restricted Surface Occupancy (“RSO”) and Sensitive Wildlife Habitat (“SWH”) layer available at the COGCC to determine what wildlife impacts may be attributed to our proposed development plan. Based on our review there are no proposed activities planned within any RSO boundaries, however there are proposed activities within three (3) SWH boundaries. Those details are provided in the table below. We also reviewed the most current CPW GIS data for the project. The data is generally consistent between the two (2) data sets. However, based on the CPW data, the Federal 299-23-3 pad would not be located within the Greater Sage-Grouse Production Area. This is also consistent with habitat data available from the BLM.

O&G Location	BLM Big Game Winter Range Timing Limitation	Objective Criteria #6 - O&G Location		Objective Criteria #12 - Access Road	
		RSO	SWH	RSO	SWH
RG 41-18-297	December 1 - April 30	NA	Mule Deer Critical Winter Range	NA	Elk Production Area
RG 23-7-297	December 1 - April 30	NA	Mule Deer Critical Winter Range	NA	Elk Production Area
RGU 23-6-297	December 1 - April 30	NA	Mule Deer Critical Winter Range	NA	Mule Deer Critical Winter Range
RGU 44-1-298	December 1 - April 30	NA	Mule Deer Critical Winter Range	NA	Mule Deer Critical Winter Range
Pitchers' Mound Pit	December 1 - April 30	NA	Mule Deer Critical Winter Range	NA	Mule Deer Critical Winter Range
Federal 299-23-3	December 1 - April 30	NA	Elk Production Area	NA	Elk Production Area & Greater Sage-Grouse Production
Wagonroad Ridge CWMF	NA	NA	Elk Production Area	NA	Elk Production Area

TEP is preparing to submit BLM and COGCC permit applications for the RG 41-18-297 pad and RGU 23-6-297 pad within the next two weeks. Assuming TEP receives permit approval late summer/early fall 2020, TEP would likely begin construction of the RG 41-18-297 and RGU 23-7-297 this fall with construction planned to be completed prior to December 1, 2020. The BLM Big Game Winter Range Timing Limitation for these two locations begins December 1 and ends April 30. Drilling operations are expected to begin in late April 2021 on the RG 41-18-297 pad. The project timeline is described in greater detail in the attached LWRMDP.

During the planning process, TEP evaluated planning and operational measures that will be used to minimize impacts to sensitive wildlife. Standard Best Management Practices (“BMP”) are also used field wild to minimize potential impacts to wildlife. These mitigation measures/BMPs are listed below. Once our development schedule is solidified, we plan to meet with CPW and BLM later this year to review any changes to the development schedule and to determine if any additional mitigation measures may be required.

The following planning and operational measures have been included in the development plan to minimize impacts to wildlife:

1. TEP will utilize the existing RGU 23-6-297 pad as a centralized produced water storage facility for produced water from the RG 41-18-297 pad and RGU 23-7-297 pad minimizing truck traffic to the well pads. Pipelines will be installed from the production facilities on the well pads, and produced water will gravity feed into the tank battery on the RGU 23-6-297 pad. Initially, TEP had planned to install permanent pumps, tanks, and additional pipelines on the RG 41-18-297 pad and RGU 23-7-297 pad to manage produced water from the proposed wells. Centralizing water storage minimizes vehicle traffic and pumping operations to a single location.
2. TEP will install temporary surface pipelines and permanent buried pipelines to transport produced water during frac operations minimizing truck traffic. A significant amount of produced water is used for completions operations. Trucking that volume of water would significantly increase vehicle traffic and would increase the potential for wildlife related traffic accidents. Pumping water via pipelines minimizes impacts to wildlife.
3. TEP evaluated multiple sites for drilling operations, and determined that impacts to wildlife habitat would be greatly reduced by utilizing existing well pads to the greatest extent possible. We will further minimize impacts to wildlife habitat by conducting completions operations remotely from a nearby existing pad locations.
4. TEP will install exclusionary devices to prevent wildlife from accessing equipment stakes, vents, and openings.
5. Proposed permanent pipelines will be collocated within existing pipeline corridors or access roads wherever possible to minimize impacts to wildlife habitat.

The following BMP's will be included as operator proposed Wildlife BMP's on all Form 2As associated with this project:

- 1.To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions.
- 2.During post-development production operations, TEP will make best efforts to minimize operations at these locations during winter months by maximizing operations when possible between 10:00am to 3:00pm when wildlife activity is minimal.
- 3.TEP agrees to report any bear conflicts immediately to CPW. TEP will implement COGCC Rule 1204.a.1 by utilizing bear proof dumpsters and trash receptacles for all food related trash. All garbage and trash will be stored in enclosed bear proof trash containers and transported to an approved disposal facility periodically and upon completion of planned operations on the location.
- 4.TEP will preclude from the use of aggressive CPW-identified non-native grasses and shrubs in mule deer habitat and will reclaim the site using CPW-identified native shrubs, grasses, and forbs appropriate to the ecological site disturbed.
- 5.Certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife, will be used.
- 6.TEP will use certified, weed free grass hay, straw, or other mulch materials used for the reseeding and reclamation of disturbed areas.

Please review the attached LWRMDP and the mitigation measure/BMP's listed above and let me know if you have any questions. I have included a link to the [LWRMDP](#) project folder, which includes the most current project shapefiles and additional project documentation for your review. TEP is committed to the protection of wildlife resources within our development area. We look forward to working with you on this project.

Thanks,

Adam Tankersley | Planning Lead | TEP Rocky Mountain LLC | 1058 CR215 Parachute, CO 81635

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