



WILDLIFE PROTECTION PLAN

CPX Piceance Holdings, LLC (CPX) owns and operates Tepee Park Ranch (TPR) in Garfield County, Colorado. CPX has prepared this Wildlife Protection Plan for its proposed Temporary Water Support Pad 25B on TPR. The sections below correspond to Colorado Oil & Gas Conservation Commission (COGCC) Rule 304.c.(17) to prepare a Wildlife Plan consistent with Rule 1201.a and with COGCC Wildlife Protection Plan Guidance (June 25, 2021).

1.0 Site Description and Environmental Setting

CPX owns and operates TPR, predominantly for the exploration and production of natural gas. The area is zoned Rural by Garfield County. It is bounded by U.S. Forest Service land to the north, south, and east. An existing Well Pad 25A is located in the SW ¼ SE ¼ Section 25, Township 7 South, Range 94 West. CPX submitted a permit application to COGCC for continued development of Well Pad 25A with an additional 34 natural gas wells and conversion of an existing drilled but uncompleted well for use as a Class II Underground Injection Control (UIC) well.

The proposed Temporary Water Support Pad 25B will provide a location for temporary water storage during well development on TPR. Two types of water are planned for storage: (1) recycled produced water to use during well completions and (2) water from well completions to be used for future well completions or to be stored before disposal in a proposed Class II Underground Injection Control (UIC) well on Well Pad 25A. Water from well completions will pass through a 4-phase separator and tanks with vapor control on Well Pad 25A before routing to Pad 25B. Pad 25B will not contain wells.

Water storage will total approximately 150,000 bbls in modular large volume tanks (MLVTs). Tank procurement is dependent on availability. Tanks are forecasted to be either 10,000-bbl or 15,000-bbl in size, or approximately 10 to 15 tanks. The tanks will be inside of a 4-foot-high lined synthetic muscle wall containment area, sized to contain 150 percent of the largest tank. A 2-foot-high compacted earthen berm will surround the containment area. An approximately 411-foot portion of the existing private dirt Tepee Park Ranch road will be rerouted to accommodate the proposed Pad 25B.

The environmental setting for Pad 25B is aspen woodland with an understory of native forbs and grasses. They include Kentucky bluegrass, blue wildrye, red baneberry, Porter's licorice-root, tall ragwort, Fendler's meadow-rue, Columbian monkshood, Thimbleberry, Tall fleabane, Richardson's geranium, and Mountain brome. Environmental field reviews were conducted in the area on September 6, 2021 and June 15, 2021. In addition to the environmental field reviews, CPX conducted a desktop review and mapping using the sources listed in Section 6.0 References.

2.0 High Priority Habitat and Colorado Parks & Wildlife Consultation

Pad 25B is not located in High Priority Habitat (HPH). Its location was selected to avoid Rule 1202.c.(1).R, cutthroat trout designated crucial habitat. The location will have no buried flowlines.

The location will be constructed, in part, on the existing dirt Tepee Park Road roadbed to limit the area of new disturbance. An approximately 411-foot portion of the existing road will be rerouted. Approximately 310 feet of the reroute will be along the edge of mapped Rule 1202.c.(1).R HPH buffer, as shown below in Figure 1, on the attached Wildlife Habitat Drawing, and on the attached Construction Layout Drawing. The disturbance in the HPH buffer is necessary to provide sufficient area to place stormwater controls north of Pad 25B and to reduce the road grade south of Pad 25B. The affected areas in HPH are an approximately 205-foot-long segment north of Pad 25B and an approximately 105-foot-long segment south of Pad 25B.

Rule 1202.c.(2).C allows for such access road construction in HPH identified in Rules 1202.c.(1).Q-S in association with an approved Form 2A, subject to best management practices (BMPs) or other avoidance measures agreed to in consultation with Colorado Parks and Wildlife (CPW).

Accordingly, CPX conducted a pre-application consultation with CPW on June 2, 2022. CPX provided wildlife habitat mapping, a Construction Layout Drawing, and detailed BMPs and avoidance measures to prevent runoff of soils and sediments and potential impacts to HPH. The controls include:

Duration

CPX will minimize the duration for road construction to an estimated 5 days. The timing of construction will optimize dry weather to avoid operating equipment in wet soils. The short duration and targeted dry weather reduce the potential for stormwater runoff.

Compaction

Crews will compact soils with heavy equipment and water during road building. Compaction minimizes loose soils. The dirt road surface will be capped with gravel and compacted again to further minimize loose soils.

Straw Wattles

Straw wattles will be staked into trenches during road construction. Trenching and staking secures the wattles to prevent their movement and disintegration and to allow the wattles to maximize capture of loose soils.

Vegetative Filter Strip

A borrow ditch will be installed along the side of the road. The ditch will be sprayed using a hydroseeder and tackifier to vegetate the disturbed soils. The practice forms a vegetative filter strip to slow stormwater velocity and allow any sediments to settle.

Check Dams

The ditch will contain check dams made from 4" minus fractured shale. The advantage of using shale is that the rock locks together as a matrix to slow stormwater velocity and allow any sediments to drop out. There will be short runs between check dams to increase their effectiveness in slowing stormwater velocity during a significant rain event.

Sediment Traps

Multiple sediment traps will be installed along the ditch. The sediment traps will be armored with rock at the inlets and outlets. Sediments will settle in the sediment trap for mechanical removal. The captured sediment will consist of clean roadside sediment, which can be reclaimed by trucking it to a location for reuse during reclamation of Pad 25B.

Avoidance

The approximately 310 feet of affected roadway is located along the edge of mapped HPH. On the north end, an unnamed drainage mapped by the U.S. Geological Survey as an intermittent waterbody is greater than 500 feet away. It contains woody debris and no stream features. On the south end, an unnamed drainage mapped by the

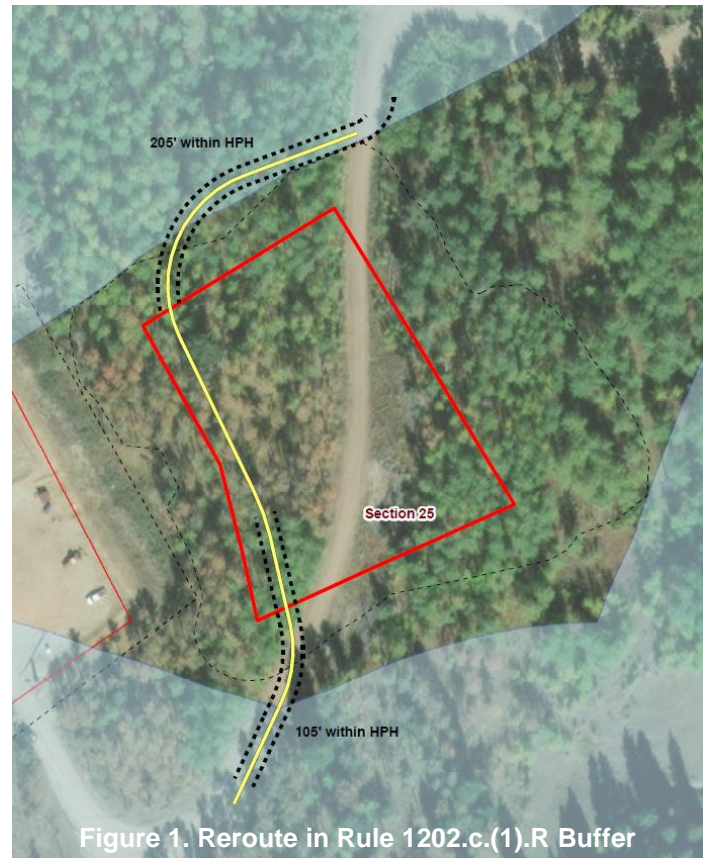


Figure 1. Reroute in Rule 1202.c.(1).R Buffer

USGS as an intermittent waterbody is uphill from the road construction. The features received CPW review during the waiver granted to CPX on June 15, 2021 for the proposed development of CPX's Pad 25A. The nature of these features, their distance, the topography, and the successive layers of BMP controls described above is expected to avoid impacts to HPH from construction of the road reroute.

CPX received CPW's finding on June 14, 2022 that CPW agrees with the described BMPs and avoidance measures per Rule 1202.c.(2).C. The CPW documentation is attached to this Plan.

3.0 Other Mapped Species

There are two terrestrial species with habitat mapped by COGCC within 1 mile of the Pad 25B Working Pad Surface: elk and lynx. The Wildlife Habitat Drawing shows the habitat and distances listed in Table 1.

Table 1. Mapped Terrestrial Species

Mapped Habitat	Distance and Direction from Working Pad Surface (feet)
Elk Production ¹	3,980 E
Lynx Denning ²	2,400 N and 5,400 S
Lynx Winter ²	5,240 S

¹COGCC COGIS High Priority Habitat

²U.S. Forest Service Habitat Data: <https://www.fs.usda.gov/main/whiteriver/landmanagement/gis>

Development on Pad 25B will avoid potential impacts to mapped elk habitat. The pad represents a continued land use in the area. It is separated from mapped habitat by a ridgeline and by approximately 0.75 miles of spruce/fir forest and aspen woodlands. Elk use of habitat in the area is concentrated in the Mamm Creek area to the east. The combination of topography, forest cover, and distance attenuates noise and light and avoids potential impacts to mapped habitat.

Development on Pad 25B will avoid potential impacts to mapped lynx habitat. The pad represents continued activity that has occurred historically on TPR. The pad is separated from mapped lynx habitat by approximately 0.50 miles of aspen woodlands to the north. It is separated from mapped habitat by approximately 1 mile of spruce/fir forest, aspen woodlands, and two ridgelines to the south.

In 2017, CPX prepared an Environmental Assessment under the National Environmental Policy Act to support U.S. Forest Service review of CPX's proposed pipeline and road construction and road use on Forest Service Land north of TPR. The affected area was adjacent to the mapped lynx habitat shown to the north of Pad 25B and listed in Table 1. The Forest Service approved CPX's pipeline and road construction and road use with a Finding of No Significant Impact and issued a pipeline right-of-way and road use permit. In its Decision Notice (November 3, 2017) the Forest Service stated its finding that there would be no significant adverse effects on wildlife and their habitat, including from construction and road use on National Forest System Road 824 adjacent to the lynx denning habitat in Section 25, Township 7 South, Range 94 West.

In addition to the Forest Service review described above, the White River National Forest Land and Resource Management Plan (Forest Plan) (2002) establishes objectives for lynx. The Plan lists protecting water quality and habitat connectivity in linkage areas; managing vegetation, grazing, and recreation; and discouraging snow compaction in lynx habitat. There are no references in the Forest Plan to noise or light in relation to lynx. The Forest Service prepared a Southern Rockies Lynx Amendment (2008) with updated management direction for eight forest plans, including White River National Forest. In its discussion of energy development, the Amendment discusses additional guidelines for winter access and for reclamation plans in lynx habitat. There are, again, no references to noise or light in relation to lynx. The Amendment concludes that any site-specific effects will be determined at an Application for Permit to Drill (APD) stage or a Geographic Planning stage.

A 2011 CPW study of habitat use by radio-collared lynx reintroduced to Colorado found that the average elevation for lynx habitat was 10,780 feet with the majority of habitat located between 9,900 feet and 11,620 feet. Pad 25B is located at approximately 9,069 feet in elevation, which is over 800 feet lower in elevation than the majority of lynx habitat, and approximately 1,700 feet below the average elevation of lynx habitat. Activity on Pad 25B avoids impacts to lynx habitat from the distance between the pad and habitat and also from the difference in elevation.

4.0 Rule 1202.a Requirements

Table 2 describes how the operator will implement Rules 1202.a.(1-10) and 1202.b for the Oil and Gas Location.

Table 2. Rule 1202.a Requirements

Provision	Implementation
1202.a.(1)	The operator will install and use bear-proof dumpsters and trash receptacles for unsecured food-related trash at facilities that generate trash.
1202.a.(2)	The operator will not withdraw from or discharge into surface waters.
1202.a.(3)	The operator will not situate new staging, refueling, or chemical storage areas within 500 feet upgradient of the ordinary high water mark of any river, perennial or intermittent stream, lake, pond, or wetland.
1202.a.(4)	The Oil and Gas Location will have no drilling, production, or other fluid pits.
1202.a.(5)	Trenches are not planned to support Pad 25B.
1202.a.(6)	When conducting interim and final reclamation pursuant to Rules 1003 and 1004, the operator will use CPW-recommended seed mixes for reclamation when consistent with any local soil conservation district requirements.
1202.a.(7)	Existing site security will be used for the location. Fencing is not planned for installation.
1202.a.(8)	The operator will conduct all vegetation removal necessary for oil and gas operations outside of the nesting season for migratory birds (April 1 to August 31). For any vegetation removal that must be scheduled between April 1 to August 31, the operator will implement appropriate hazing or other exclusion measures prior to April 1 to avoid take of migratory birds. If hazing or other exclusion measures are not implemented, the operator will conduct pre-construction nesting migratory bird surveys within the approved disturbance areas prior to any vegetation removal during the nesting season. If active nests are located, the operator will provide work zone buffers around active nests.
1202.a.(9)	The Oil and Gas Location will have no drilling, production, or other fluid pits.
1202.a.(10)	<p>The Operator will employ the following BMPs for a Working Pad Surface between 500 feet and 1,000 feet upgradient from Rule 1202.c.(1).R HPH:</p> <ul style="list-style-type: none"> A. Contain Flowback and Stimulation Fluids in Tanks that are placed on a Working Pad Surface in an area with downgradient perimeter berming. This location will not have flowback or stimulation fluids. B. Construct lined berms or other lined containment devices pursuant to Rule 603.o around any new crude oil, condensate, and produced water storage Tanks that are installed after January 15, 2021. C. Inspect the Oil and Location on a daily basis, unless the approved Form 2A provides for different inspection frequency or alternative method of compliance. D. Maintain adequate Spill response equipment at the Oil and Gas Location during drilling and completion operations. E. Not construct or utilize any Pits.
1202.b	There will be no proposed flowline crossings of perennial streams identified as aquatic HPH.

5.0 General Operating Requirements and Other BMPs

Table 3. General Operating Requirements and Other BMPs

BMP	The Operator Will
1	Inform and educate employees and contractors on wildlife conservation practices, including no harassment or feeding of wildlife.
2	Consolidate and centralize fluid collection and distribution facilities to minimize impact to wildlife.
3	Adequately size infrastructure and facilities to accommodate both current and future gas production.
4	Implement fugitive dust control measures.
5	Minimize the duration for road construction to optimize dry weather and avoid operating equipment in wet soils.
6	Compact soils with heavy equipment and water during road building and cap with gravel to minimize loose soils.
7	Stake straw wattles into trenches during road construction to secure the wattles and prevent their movement and disintegration.
8	Install a borrow ditch along the side of the road. Spray the ditch using a hydroseeder and tackifier to vegetate the disturbed soils and form a vegetative filter strip.
9	Install check dams from 4" minus fractured shale to slow stormwater velocity and allow any sediments to drop out.
10	Armor sediment traps with rock at the inlets and outlets. Remove and reclaim sediment for reuse during reclamation.
11	Mow or brush hog vegetation where appropriate, leaving root structure intact, instead of scraping the surface, where allowed by the surface owner.
12	Limit access to oil and gas access roads.
13	Post speed limits and caution signs to the extent allowed by surface owners, federal and state regulations, local government, and land use policies.
14	Use topographic features and vegetative screening to create seclusion areas.
15	Reduce traffic associated with transporting drilling water and produced liquids through the use of pipelines, large tanks, or other measures.
16	Store and stage emergency spill response equipment at strategic locations along perennial water courses so that it is available to expedite effective spill response.
17	Avoid dust suppression activities within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

6.0 References

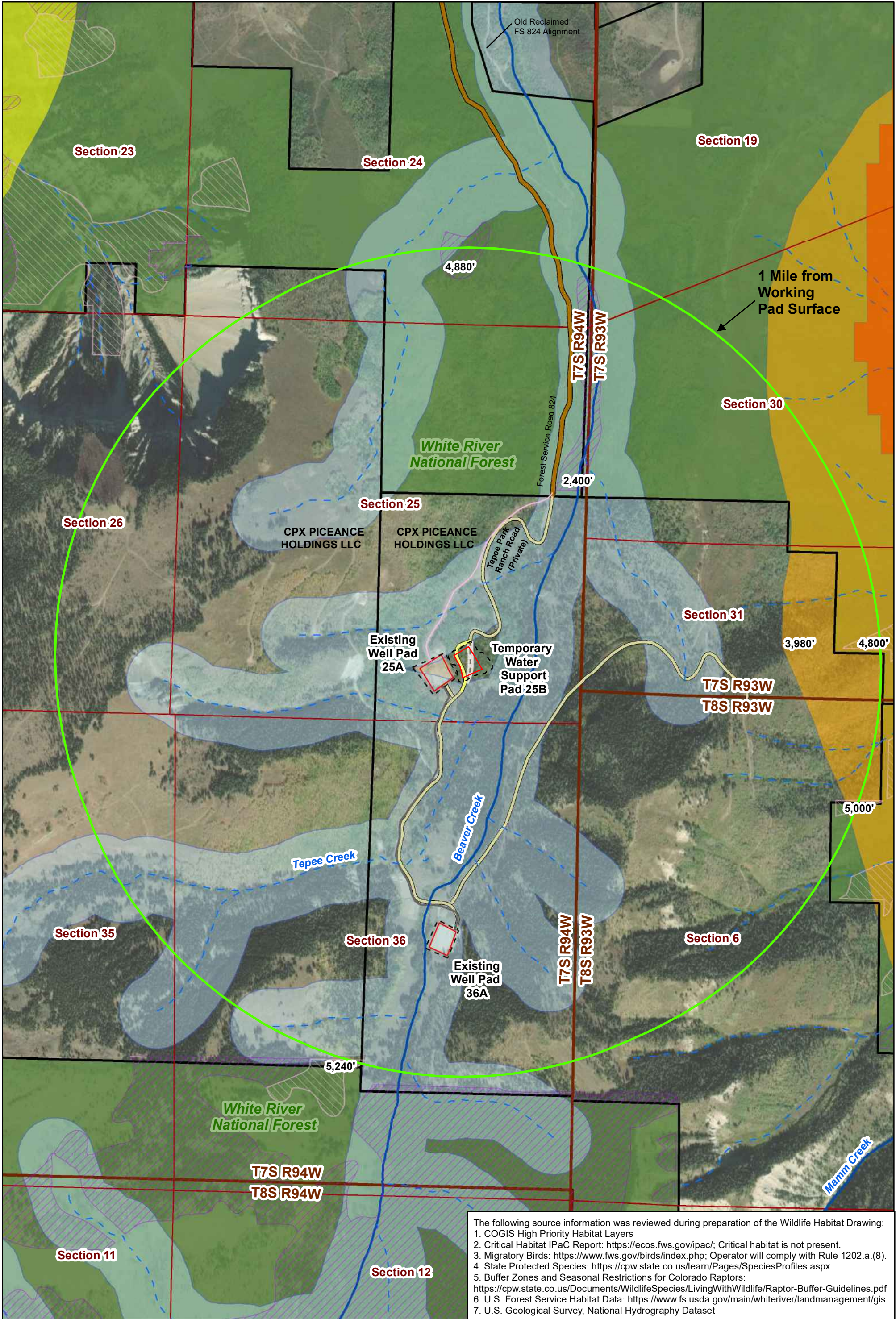
1. COGIS High Priority Habitat Layers.
2. Critical Habitat IPaC Report: <https://ecos.fws.gov/ipac/>.
3. Migratory Birds: <https://www.fws.gov/birds/index.php>.
4. State Protected Species: <https://cpw.state.co.us/learn/Pages/SpeciesProfiles.aspx>.
5. Buffer Zones and Seasonal Restrictions for Colorado Raptors:
<https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/Raptor-Buffer-Guidelines.pdf>.
6. U.S. Forest Service Habitat Data: <https://www.fs.usda.gov/main/whiteriver/landmanagement/gis>.
7. U.S. Geological Survey, National Hydrography Dataset.
8. Areas of high habitat use from 1999-2010 for radio-collared Canada lynx reintroduced to Colorado: [Lynx habitat use \(state.co.us\)](#).

Attachments

Wildlife Habitat Drawing

Construction Layout Drawing

Colorado Parks and Wildlife Consultation under Rule 1202.c.(2).C (June 14, 2022)



The following source information was reviewed during preparation of the Wildlife Habitat Drawing:

1. COGIS High Priority Habitat Layers
2. Critical Habitat IPaC Report: <https://ecos.fws.gov/ipac/>; Critical habitat is not present.
3. Migratory Birds: <https://www.fws.gov/birds/index.php>; Operator will comply with Rule 1202.a.(8).
4. State Protected Species: <https://cpw.state.co.us/learn/Pages/SpeciesProfiles.aspx>
5. Buffer Zones and Seasonal Restrictions for Colorado Raptors: <https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/Raptor-Buffer-Guidelines.pdf>
6. U.S. Forest Service Habitat Data: <https://www.fs.usda.gov/main/whiteriver/landmanagement/gis>
7. U.S. Geological Survey, National Hydrography Dataset

Aota Technical, LLC
CPX Piceance Holdings, LLC
Tepee Park Ranch
Temporary Water Support Pad 25B
Wildlife Habitat Drawing
 Garfield County
 SW1/4SE1/4 Sec. 25, T7S R94W, 6th P.M.

Date: 6/3/22
 Figure No.: Figure 3

Legend

- Existing Off-location Flowlines
- Proposed Off-location Flowlines
- Oil and Gas Location
- Working Pad Surface
- 1 mile from Working Pad Surface
- Parcels
- Forest Service Jurisdiction
- Forest Service Road
- Private Road
- Private Road Reroute and
- Reclaimed Private Road
- National Hydrography Dataset
- Perennial Stream
- Intermittent Stream

Rule 1202.c NSO Habitats

- Cutthroat Trout Designated Crucial Habitat

Rule 1202.d Density Habitats

- Elk Production
- Elk Winter Concentration
- Mule Deer Migration Corridor

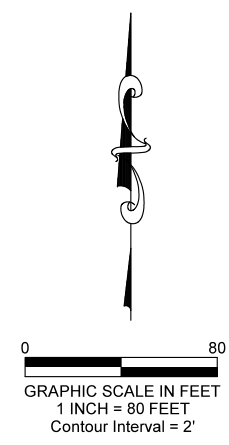
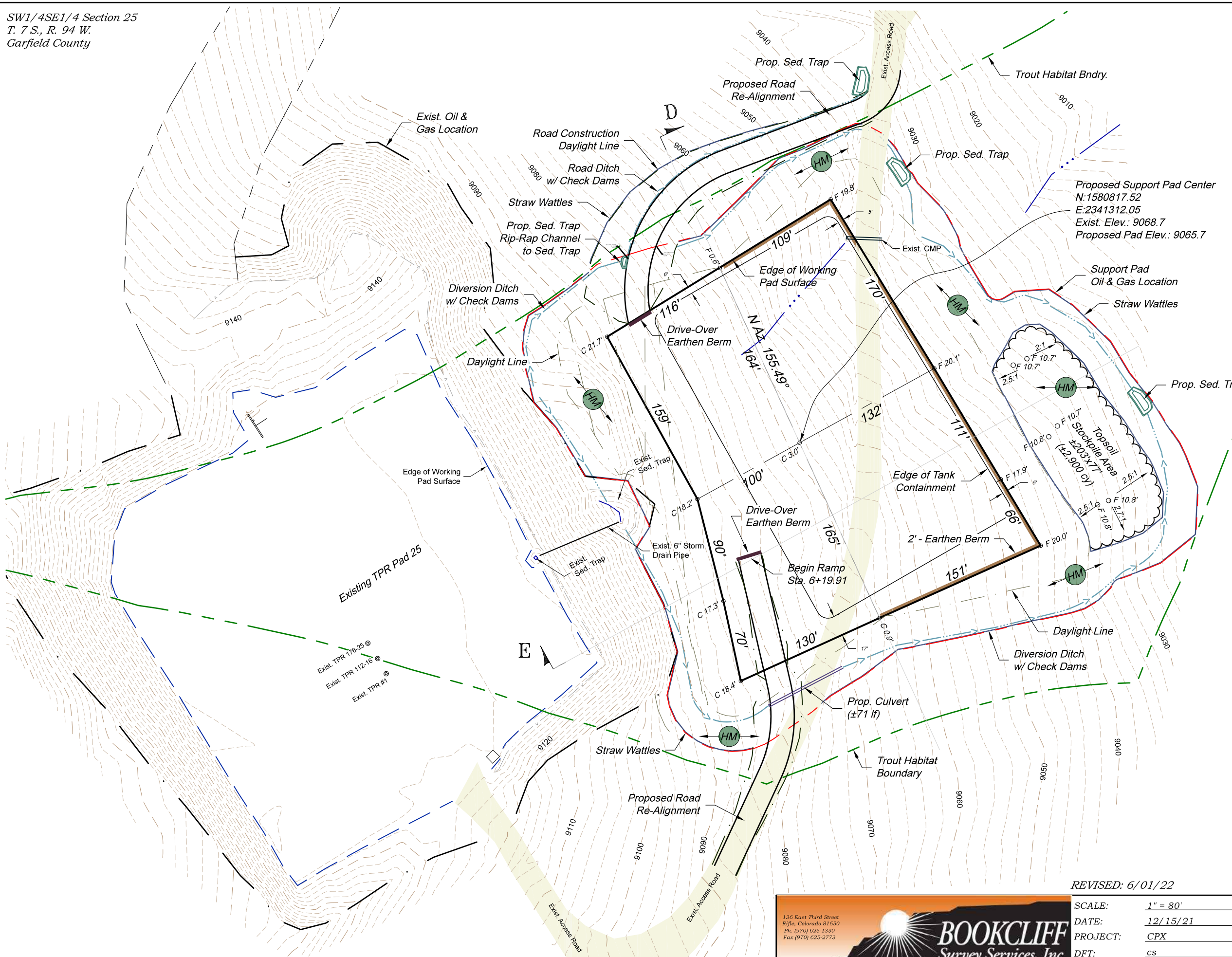
USFS Lynx Habitat

- Denning
- Winter

Notes:
 (1) Beaver Creek also designated as 1202.c Native Fish and Other Native Aquatic Species Conservation Waters.
 (2) Tepee Creek also designated as 1202.c Sporthish Management Waters.
 (3) Rule 309.e.(1) Other Consultation Habitat is not present.

Scale: 0, 375, 750, 1,125, 1,500 Feet

SW1/4SE1/4 Section 25
T. 7 S., R. 94 W.
Garfield County



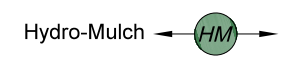
Proposed Support Pad Center
N:1580817.52
E:2341312.05
Exist. Elev.: 9068.7
Proposed Pad Elev.: 9065.7

- *Notes**
- 1) Design Cut Slope: 1.5:1
Design Fill Slope : 1.5:1
 - 2) CY soil based on topsoil depth
 - 3) 20% Swell Factor Applied to Earthwork Cut Volumes.

DISTURBANCE AREAS
Oil and Gas Location: ±4.13 ac
Working Pad Surface: ±1.83 ac

Workin Pad Surface: 328'x232'

Proposed Road Length: 411 lf
Road Width: 20 ft
Total Disturbance: 0.20 ac



ESTIMATED EARTHWORK QUANTITIES (cy)				
ITEM	CUT	FILL	TOPSOIL	EXCESS
PAD	24,790	22,560	2,900	20
TRENCH	0	0		0
TOTALS	24,790	22,560	2,900	20

REVISED: 6/01/22

136 East Third Street
Rifle, Colorado 81650
Ph. (970) 625-1330
Fax (970) 625-2773

BOOKCLIFF
Survey Services, Inc.

SCALE: 1" = 80'
DATE: 12/15/21
PROJECT: CPX
DFT: cs

Construction Plan Prepared for:

CPX Piceance Holdings, LLC

Temporary Water Support Pad 25B
CONSTRUCTION LAYOUT DRAWING
PLAN VIEW

Archived: Tuesday, June 14, 2022 4:17:42 PM
From: Neumann - DNR, Danielle
Sent: Tuesday, June 14, 2022 12:17:24 PM
To: gwen.brodsky@aota.tech
Cc: Nick Kurtenbach; Bryan Clark
Subject: Re: CPX Piceance Holdings consultation on BMPs under Rule 1202.c.(2).C
Sensitivity: Normal

Ms. Brodsky,

Thank you for this communication. CPW agrees with the described Best Management Practices and avoidance measures per Colorado Oil and Gas Conservation Commission (COGCC) Rule 1202.c.(2).C, which is accurately cited for Temporary Water Support Pad 25B.

Sincerely,

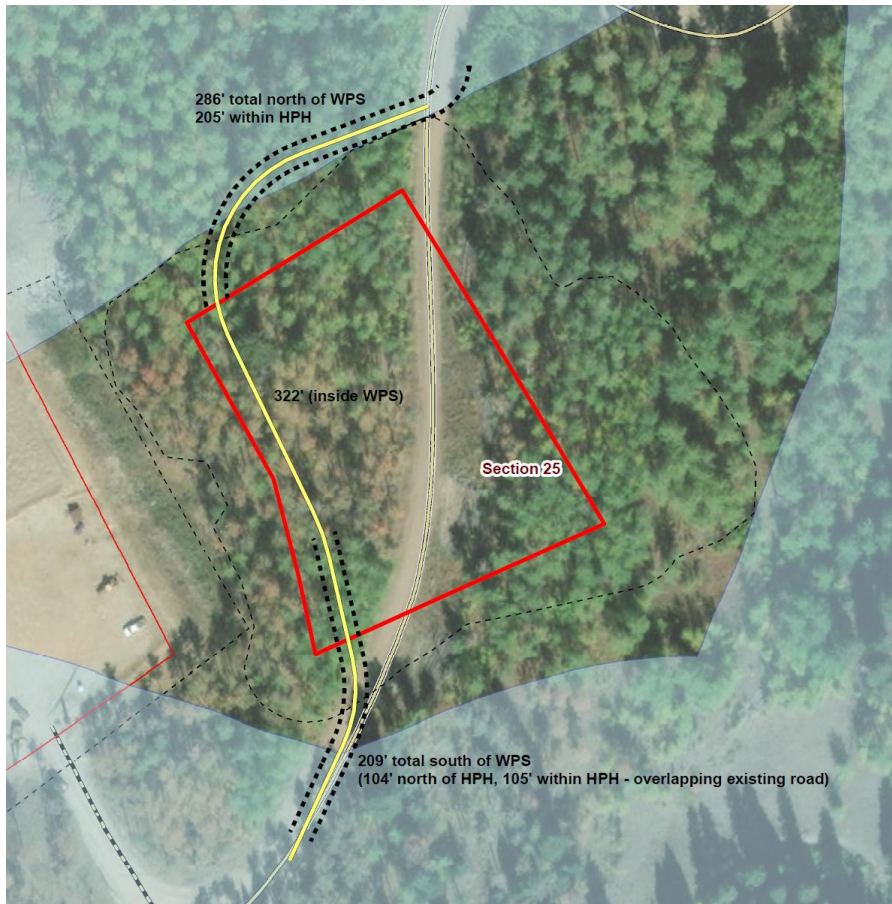
Danielle Neumann
NW Region Land Use Specialist

On Thu, Jun 2, 2022 at 11:44 AM <gwen.brodsky@aota.tech> wrote:

Dani,

This email requests the CPW consultation required under Colorado Oil and Gas Conservation Commission (COGCC) Rule 1202.c.(2).C. The rule allows for access road construction and Flowline/utility corridor clearing and installation activities within the High Priority Habitat identified in Rules 1202.c.(1).Q-S in association with an approved Form 2A *subject to Best Management Practices (BMPs) or other avoidance measures agreed to in consultation with CPW*. Accordingly, CPX Piceance Holdings, LLC (CPX) is requesting CPW agreement with the BMPs and avoidance measures described in this email.

CPX is preparing an Oil and Gas Development Plan/Form 2A application for COGCC approval of a Temporary Water Support Pad 25B. Pad 25B is proposed to provide an area to temporarily store recycled produced water and post-separation, post-vapor-controlled flowback water during new well development on CPX's Tepee Park Ranch. Pad 25B is not located in HPH. Its location was specifically selected to avoid disturbance in HPH. Short portions of the existing private Tepee Park Ranch road, however, will need to be rerouted to provide sufficient area to place stormwater controls north of Pad 25B and to reduce the road grade south of Pad 25B. In total, CPX proposes to reroute one approximately 205-foot-long segment and one approximately 105-foot-long segment of existing roadway along the edge of Rule 1202.c.(1).R high priority habitat (HPH) for cutthroat trout. The affected segments are outlined in black dashed lines below. The broader area is shown on the attached Construction Layout Drawing. The BMPs and avoidance measures for stormwater controls during road construction are described below.



Duration

CPX will minimize the duration for road construction to an estimated 5 days. The timing of construction will optimize dry weather to avoid operating equipment in wet soils. The short duration and targeted dry weather reduces the potential for stormwater runoff.

Compaction

Crews will compact soils with heavy equipment and water during road building. Compaction minimizes loose soils. The dirt road surface will be capped with gravel and compacted again to further minimize loose soils.

Straw Wattles

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Avoidance

The approximately 310 feet of affected roadway is located along the edge of mapped HPH. On the north end, an unnamed drainage mapped by the U.S. Geological Survey as an intermittent waterbody is approximately 500 feet away. It contains woody debris and no stream features. On the south end, an unnamed drainage mapped by the USGS as an intermittent waterbody is uphill from the road construction. The features are shown on the attached Wildlife Habitat Drawing and received CPW review during the waiver granted to CPX on June 15, 2021 for the proposed development of CPX's Pad 25A. The nature of these features, their distance, the topography, and the successive layers of BMP controls described above is expected to avoid impacts to HPH from construction of the road reroute.

Please let me know if I can help with any questions.

Thank you very much for your assistance with this,

Gwen

Gwen Brodsky | Principal Planner

Cell (303) 818-4462

gwen.brodsky@aota.tech

Aota Technical, LLC | Denver, CO

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