

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,

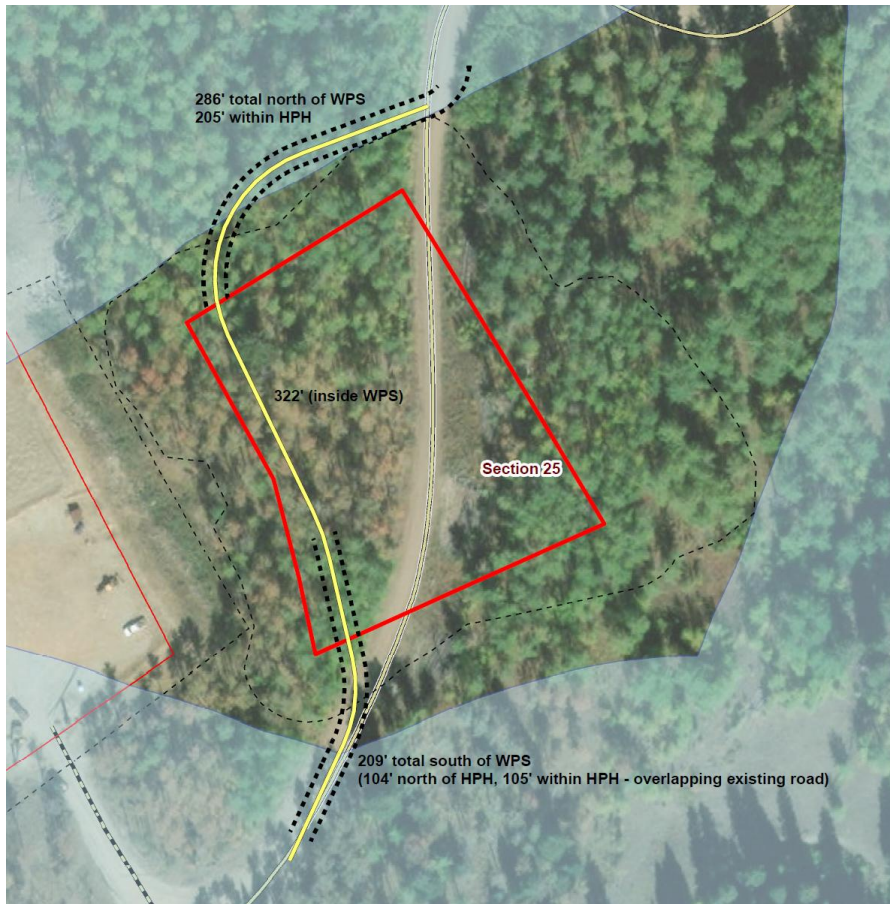
Danielle Neumann
NW Region Land Use Specialist

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

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 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

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