



# CUMULATIVE IMPACTS PLAN

## 1.0 OIL AND GAS LOCATION DESCRIPTION

CPX Piceance Holdings, LLC (CPX) owns and operates Tepee Park Ranch (TPR) in Garfield County, Colorado. CPX has prepared this Cumulative Impacts Plan for the proposed Temporary Water Support Pad 25B on TPR. The sections below correspond to Colorado Oil & Gas Conservation Commission (COGCC) Rule 304.c.(19) to prepare a Cumulative Impacts Plan consistent with the provisions of the rule.

TPR is privately owned and operated by CPX, predominantly for the exploration and development of natural gas wells. Pad 25B will be used as a temporary water support pad during well development on TPR. It will not contain wells. The location will be used to store two types of water: (1) recycled produced water to use during well completions on TPR and (2) water from well completions to be used for future well completions on TPR or stored for disposal in a proposed Class II Underground Injection Control (UIC) well on CPX's existing Well Pad 25A.

The location is approximately 12 miles south of Rifle, Colorado in the SW ¼ SE ¼ Section 25, Township 7 South, Range 94 West. The site elevation is approximately 9,069 feet.

Pad 25B will contain an anticipated 10 or 15 10,000-bbl or 15,000-bbl modular large volume tanks (MLVTs). The approximately 4.1-acre disturbance will be reduced after construction to an approximately 1.8-acre lined containment area for the tanks. The containment area will be surrounded by a 4-foot-high synthetic muscle wall. A 2-foot-high compacted earthen berm will surround the muscle wall. The location is described in Table 1.

**Table 1. Pad 25B Location**

Legal Description	Location Coordinates	County
SW ¼, SE 1/4, Section 25 Township 7 South, Range 94 West	Latitude: 39.404901 Longitude: -107.831352	Garfield

Pad 25B is proposed in an area zoned Rural by Garfield County. This portion of TPR is bounded by U.S. Forest Service land to the north, south, and east and by additional CPX lands to the west. The surrounding area is predominantly aspen woodland with an understory of native forbs and grasses.

Beaver Creek, a perennial waterbody, flows from south to north across TPR. The creek is approximately 930 feet downgradient to the northeast of Pad 25B. Pad 25B is not within 500 linear feet from any waters of the state.

TPR is accessed using the existing 20-foot-wide unpaved private Tepee Park Ranch road. Pad 25B will be constructed in part over the road. Approximately 411 feet of the road will be rerouted to provide sufficient area to place stormwater controls north of Pad 25B and to reduce the road grade south of Pad 25B.

An existing off-location buried 8-inch flexsteel water flowline will be used to deliver recycled produced water to Pad 25B. Steel 4-inch surface lines will be used to transfer from and return water to Pad 25B.

After well completions on TPR are finished, any residual water in the MLVTs will be disposed of using CPX's proposed UIC well on Well Pad 25A and potential hauling to a third-party disposal facility. MLVTs then will be taken out of service. MLVTs and appurtenances will be dismantled and removed from the location. The access road will be returned to its original alignment. The pad will be reclaimed.

The disturbance areas and anticipated schedule are shown in Tables 2 and 3.

**Table 2. Disturbance Areas**

Area	Acres
Oil and Gas Location	4.1
Working Pad Surface	1.8
Tepee Park Ranch Road Reroute	0.2
<b>TOTAL NEW DISTURBANCE</b>	<b>4.3</b>

**Table 3. Anticipated Schedule**

Location	Schedule
Construction	1 month
Completions Support per Pad	8 months
Interim Reclamation	1 month
Operation	3 years

This Plan addresses the COGCC requirement at Rule 304.c.(19) to address cumulative impacts to resources identified in Rule 303.a.(5). Pursuant to Rule 304.c.(19), the Plan includes:

- A. A description of resources to which cumulative adverse impacts are expected to increase;
- B. A description of measures taken to avoid or minimize the extent to which cumulative impacts are increased;
- C. A description of measures taken to mitigate or offset cumulative impacts; and
- D. Additional information determined to be reasonable and necessary to the evaluation of cumulative impacts.

Resources listed in Rule 303.a.(5) and addressed in this Plan are:

- Air Resources
- Public Health
- Water Resources
- Terrestrial and Aquatic Wildlife Resources & Ecosystems
- Soil Resources
- Public Welfare, including:
  - Noise
  - Light
  - Odor
  - Dust
  - Recreation and Scenic Values

## **2.0 AIR RESOURCES**

### **A. Cumulative Impacts**

Garfield County is designated attainment for National Ambient Air Quality Standards established by the U.S. Environmental Protection Agency. There will be cumulative impacts from air emissions of criteria and non-criteria pollutants from equipment used during construction and operations.

The estimated construction and operations emissions are shown below in the pre-production and production tables. Pre-production emissions include operations for construction and tank installation. Production emissions represent 1 year of operation. Diesel vehicle road miles are shown for all phases of development.

**Table 4. Pre-Production Emissions (tons)**

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Process Heaters or Boilers	0	0	0	0	0	0	0
Storage Tanks	0	0	0	0	0	0	0
Venting or Blowdowns	0	0	0	0	0	0	0
Combustion Control Devices	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	0.55	0.36	0.09	0	0	63.07	0
Drill Mud	0	0	0	0	0	0	0
Flowback or Completions	0	0	0	0	0	0	0
Loadout	0	0	0	0	0	0	0

**Table 5. Production Emissions (tons)**

	NOx	CO	VOCs	Methane	Ethane	CO2	N2O
Stationary Engines or Turbines	0	0	0	0	0	0	0
Process Heaters or Boilers	0	0	0	0	0	0	0
Storage Tanks	0	0	0.05	0	0	0	0
Dehydration Units	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0
Separators	0	0	0	0	0	0	0
Fugitives			0	0	0	0	
Venting or Blowdowns	0	0	0	0	0	0	0
Combustion Control Devices	0	0	0	0	0	0	0
Loadout	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	21.44	4.62	1.70	0.03	0	797.15	0.01
Well Bradenhead	0	0	0	0	0	0	0
Well Maintenance	0	0	0	0	0	0	0

**Table 6. Diesel Vehicle Road Miles**

Diesel Vehicle Road Miles	Construction	Drilling	Completions	Interim Reclamation	Production <sup>1</sup>
Pad 25B	21,880	NA	1,000	80	NA

<sup>1</sup>The location will not have wells or well production. Operations will be supported by light-duty vehicles.

**B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize air impacts, CPX will:

- Store recycled produced water and water from well completions in enclosed tanks.
- Provide for controls for VOCs before storage in enclosed tanks.
- Require that employees and contractors observe posted speed limits on public roads and a 25 mile per hour speed limit on TPR access roads.
- Regularly inspect the access road for evidence of inadequate drainage and formation of potholes.

- Grade, blade, and fill potholes to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion.
- Use spot graveling to avoid erosion, formation of silts, and to stabilize surfaces for truck travel.
- Use fresh water from an approved water source to wet the surface for control of fugitive dust on the well pad, access road, or pipeline corridor.
- Mound the soil stockpile to prevent loose soils and promote vegetative growth.

**C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset air impacts, CPX will:

- Use modular large volume tanks to reduce truck traffic for completions (reduction of 12,000 round trip truck trips, est.).
- Reclaim the areas not needed to support operation in the first growing season and within 6 months after completing well development.

**D. Additional Information**

See detailed information in the Dust Mitigation Plan and Topsoil Protection Plan submitted with the Form 2A application.

**3.0 PUBLIC HEALTH**

**A. Cumulative Impacts**

The location is greater than 1 mile from the nearest residence. There are no Disproportionately Impacted Communities affected by the location. The location will not contain well drilling or wells. Produced water stored on Pad 25B will be pre-controlled using biocides, a 10-micron filter, and residence time in the third-party facility. Water from well completions stored on Pad 25B will be pre-controlled using a 4-phase separator, low pressure vessel, and produced water tanks with vapor controls. Vapor control from the enclosed combustor has a manufacturer control rating of at least 95 percent destruction. There will be no cumulative impacts to public health because of the water treatment before storage, enclosed tanks, and significant distance to the nearest receptor.

The estimated construction and operations emissions are shown below in the pre-production and production tables. Pre-production emissions include operations for construction and tank installation. Production emissions represent 1 year of operation. Estimated vehicle trips are shown for all phases of production.

**Table 7. Pre-Production Emissions (pounds)**

	Benzene	Toluene	Ethylbenzene	Xylenes	n-Hexane	2,2,4-TMP	H2S	Formaldehyde	Methanol	Total (HAP)
Process Heaters or Boilers	0	0	0	0	0	0	0	0	0	0
Storage Tanks	0	0	0	0	0	0	0	0	0	0
Venting or Blowdowns	0	0	0	0	0	0	0	0	0	0
Combustion Control Devices	0	0	0	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	0.48	0.21	0	0.15	0	0	0	0.61	0	2.01
Drill Mud	0	0	0	0	0	0	0	0	0	0
Flowback or Completions	0	0	0	0	0	0	0	0	0	0
Loadout	0	0	0	0	0	0	0	0	0	0

**Table 8. Production Emissions (pounds)**

	Benzene	Toluene	Ethylbenzene	Xylenes	n-Hexane	2,2,4-TMP	H2S	Formaldehyde	Methanol	Total (HAP)
Stationary Engines or Turbines	0	0	0	0	0	0	0	0	0	0
Process Heaters or Boilers	0	0	0	0	0	0	0	0	0	0
Storage Tanks	3.03	9.74	0.57	4.92	0.06	0	0	0	17.27	35.60
Dehydration Units	0	0	0	0	0	0	0	0	0	0
Pneumatic Pumps	0	0	0	0	0	0	0	0	0	0
Pneumatic Controllers	0	0	0	0	0	0	0	0	0	0
Separators	0	0	0	0	0	0	0	0	0	0
Fugitives	0	0	0	0	0	0	0	0	0	0
Venting or Blowdowns	0	0	0	0	0	0	0	0	0	0
Combustion Control Devices	0	0	0	0	0	0	0	0	0	0
Non-Road Internal Combustion Engines	9.07	3.98	0	2.77	0	0	0	11.47	0	18.93
Loadout	0	0	0	0	0	0	0	0	0	0
Well Bradenhead	0	0	0	0	0	0	0	0	0	0
Well Maintenance	0	0	0	0	0	0	0	0	0	0

**Table 9. Estimated Truck Trips**

Vehicle Trips	Construction	Drilling	Completions Mo / Yr	Interim Reclamation	Production <sup>1</sup>
Pad 25B	714	NA	44 / 348	96	NA

<sup>1</sup>The location will not have wells or well production. Operations will be supported by light-duty vehicles.

**B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize public health impacts, CPX will:

- Store recycled produced water and water from well completions in enclosed tanks.
- Provide for controls for VOCs before storage in enclosed tanks.

**C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset air impacts, CPX will:

- Develop operations that maximize the distance to the nearest receptor.

**D. Additional Information**

See detailed illustration of the surrounding areas on the Cultural Features Map submitted with the Form 2A application.

**4.0 WATER RESOURCES**

**A. Cumulative Impacts**

The location is greater than 0.5 miles from the nearest water well. The nearest water well was developed by CPX and is approximately 3,312 feet south of the location. The nearest downgradient surface water,

Beaver Creek, is approximately 930 feet northeast of the location. The estimated depth to groundwater is 40 feet. There will be no cumulative impacts to water wells or surface water because of the following:

- Distance to the water well
- Distance to downgradient surface water
- Depth to groundwater
- 4-foot-high lined synthetic secondary containment
- 2-foot-high compacted earthen berm surrounding secondary containment

Water use for pad construction will be an estimated 1,500 bbls of freshwater. Freshwater will be sourced from the Loesch and Crann Ditch Company intake on Last Chance Ditch in Rifle, Colorado that will be trucked to the location. Pad 25B will have a storage capacity of 150,000 bbl for recycled produced water and water from well completions. There will be cumulative impacts from the volume of freshwater used for pad construction.

#### **B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize water impacts, CPX will:

- Buffer the location from surface water by more than 930 feet.
- Install a 4-foot-high lined synthetic secondary containment barrier sized to 150 percent of the size of the largest tank. Secondary containment will be visually inspected for evidence of damage, deterioration, or loss of integrity. Repairs will be made promptly to prevent the risk of migration from a leak or spill.
- Maintain a 2-foot-high earthen berm surrounding secondary containment, compacted to 95 percent soil/moisture density.
- Capture stormwater using a system of diversion ditches, check dams, and sediment traps. Solids will settle in the check dams and sediment traps for removal. The stormwater will evaporate.
- Ensure that generators have liners to capture and contain drips or leaks.
- Stake straw wattles to control run on and runoff from loose soils.
- Provide continuous flow and pressure monitoring for temporary frac lines during completions for prompt identification of loss of pressure.
- Monitor tanks, equipment, and transfer lines daily during completions for signs of drips, leaks, or spills, which will be corrected promptly.
- Inspect tank operations for signs of a leak or spill.
- Test tanks per manufacturer's specifications prior to putting them into service. Conduct periodic testing and reinspection of equipment.
- Maintain and periodically test tank seals and valving.

### **C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset water impacts, CPX will:

- Use recycled produced water and water from well completions for subsequent well completions in lieu of freshwater.
- Perform interim reclamation during the first growing season and within 6 months after construction to reclaim disturbed soil.

### **D. Additional Information**

See detailed information in the Fluid Leak Detection Plan, Stormwater Management Plan, Interim Reclamation Plan, and on the Hydrology Map submitted with the Form 2A application.

## **5.0 TERRESTRIAL AND AQUATIC RESOURCES & ECOSYSTEMS**

### **A. Cumulative Impacts**

An approximately 310-foot section of the existing Tepee Park Ranch road will be rerouted in an area mapped as Rule 1202.c.(1).R high priority habitat for cutthroat trout. The reroute is necessary to provide sufficient area for stormwater controls north of Pad 25B and to reduce the road grade south of Pad 25B.

CPX conducted a pre-application consultation with CPW on June 2, 2022. CPX provided detailed BMPs and avoidance measures to prevent runoff of soils and sediments and potential impacts to HPH. 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 Oil and Gas Location is not within mapped HPH for terrestrial wildlife. Elk Production HPH is located approximately 3,980 feet east. The location represents a continued land use that is separated from mapped elk habitat by a ridgeline, approximately 0.75 miles of spruce/fir forest and aspen woodlands, and a drop of approximately 400 feet from the ridge into the next drainage, the Mamm Creek drainage. There will be no cumulative impacts to mapped elk habitat because the combination of topography, forest cover, and distance attenuates noise and light.

U.S. Forest Service data shows mapped lynx denning habitat approximately 2,400 feet north and 5,400 feet south of the location, and lynx winter habitat approximately 5,240 feet south of the location. The location is separated from mapped lynx habitat by 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. The average elevation for lynx habitat is 10,780 feet with the majority of habitat located between 9,900 feet and 11,620 feet, according to a CPW radio-collared lynx study cited in the Wildlife Protection Plan submitted with the Form 2A application. 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 1,710 feet below the average elevation of lynx habitat. The White River National Forest Land and Resource Management Plan (2002) and Forest Service Southern Rockies Lynx Amendment (2008) list practices management practices for lynx including 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 to noise or light in relation to lynx. The location represents continued activity that has occurred historically on TPR. The 2018 National Environmental Policy Act Environmental Assessment for realignment of Forest Service Road 824 and other improvements (U.S. Forest Service 2018) had a Finding of No Significant Impact for construction adjacent to the mapped lynx habitat. There will be no cumulative impacts to lynx habitat because of the distances to habitat, lack of well drilling activity on Pad 25B, vertical separation in elevation, and findings established previously by the Forest Service.

Colorado is part of a broad Central Flyway for migratory birds, one of four North America flyways. There is no mapping specific to migratory bird pathways near the location, according to data provided by the U.S. Fish and Wildlife Service, Colorado Parks and Wildlife, and National Audubon Society. There will be no cumulative impacts to migratory bird pathways.

The location is zoned Rural by Garfield County. Allowable land uses in areas zoned rural include oil and gas development. The land use represents temporary disturbance to 4.3 acres. After interim reclamation, the cumulative loss of cover and foraging habitat for birds and wildlife will be reduced to the 1.8-acre area supporting temporary tank operations. The life of the location is an estimated 3 years.

#### **B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize terrestrial and aquatic wildlife resources and ecosystem impacts, CPX will:

- Construct lined 4-foot-high secondary containment around water storage tanks.
- Maintain a 2-foot-high earthen berm surrounding secondary containment, compacted to 95 percent soil/moisture density.
- Maintain adequate spill response equipment on the location.
- Avoid open liquids storage on the location.
- Keep the location unlit when there is no activity requiring light.
- Downsize the location during interim reclamation to a 1.8-acre pad.
- Hydromulch and seed the remaining portion of the location.
- Seed using a Forest Service-recommended seed mix appropriate to the site's plant community.
- Monitor the location an estimated 5 days a week.
- Divert stormwater using diversion ditches, check dams, and sediment traps.
- Either conduct all vegetation removal necessary for oil and gas operations outside of the nesting season for migratory birds (April 1 to August 31) or conduct a pre-construction nesting migratory bird survey within the approved disturbance areas prior to any vegetation removal during the nesting season.

#### **C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset terrestrial and aquatic wildlife resources and ecosystem impacts, CPX will:

- Consolidate and centralize fluid collection and distribution facilities to minimize impacts to wildlife.
- Downsize the location during interim reclamation to a 1.8-acre pad.
- Reclaim the remaining portion of the location.
- Seed the reclaimed area using a U.S. Forest Service-recommended seed mix, which is appropriate to the site's plant community next to Forest Service lands and to its elevation.

**D. Additional Information**

See detailed information in the Wildlife Protection Plan and Interim Reclamation Plan, and on the Wildlife Habitat Map submitted with the Form 2A application.

**6.0 SOIL RESOURCES****A. Cumulative Impacts**

Soils at the Oil and Gas Location and access road are 338B: Wetopa-Doughspon-Echemoor, 220B: Angostura Family, and 449C: Tampico-Echemoor-Eyre. Collectively, these soils have between 5 and 65 percent slopes. The A horizon is generally loam and silty clay loam overlaying silty loam, clay loam, and cobbles. The soils are well drained.

The location will disturb approximately 4.1 acres. The access road reroute will disturb approximately 0.2 acres. Access will use the long-established Tepee Park Ranch road, which pre-dates oil and gas development on TPR. The combined disturbance is approximately 4.3 acres, as shown below. There are cumulative impacts to soil resources and vegetation from disturbance of topsoil for the pad and reroute. After interim reclamation, the location will be reduced to a 1.8-acre pad. After final reclamation, the impacts will be eliminated by removing equipment and reclaiming the pad in accordance with COGCC requirements and returning the Tepee Park Ranch road to its original alignment.

**Table 10. Disturbance Area**

Location	Oil and Gas Location (ac)	Access Road Reroute (ac)	Total Disturbance (ac)	Working Pad After Interim Reclamation (ac)
Pad 25B	4.1	0.2	4.3	1.8

**B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize soil impacts, CPX will:

- Use existing roadbed during construction to limit new surface disturbance.
- Protect topsoil from contamination by stockpiling it in a location free from storage and parking.
- Protect topsoil from compaction by designating it as topsoil for reclamation.
- Protect the topsoil stockpile from wind degradation by mounding at an approximately 2:1 to 2.7:1 slope to prevent loose soils while promoting continued microbial activity.
- Protect the topsoil stockpile from erosion by ensuring that stormwater controls and diversions are installed, where needed, to divert stormwater away from the stockpile.
- Allow vegetation to establish on the topsoil stockpile to stabilize it, outcompete weeds, and promote soil microbial activity.
- Maintain erosion controls to prevent stormwater run on to the pad.

**C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset soil impacts, CPX will:

- Use the existing Tepee Park Ranch road for access.
- Use a portion of the existing Tepee Park Ranch road for the pad to limit new disturbance.

- Conduct interim reclamation during the first favorable growing season and within 6 months after construction is complete.

#### **D. Additional Information**

See detailed information in the Topsoil Protection Plan, Stormwater Management Plan, and Interim Reclamation Plan submitted with the Form 2A application.

## **7.0 PUBLIC WELFARE**

### **A. Cumulative Impacts**

#### **Noise**

TPR proposes continuation of existing land uses, which have included historical logging operations and current natural gas production. There are no residences within 2,000 feet, or within 1 mile, of the location. The nearest residence is a single residence greater than 1 mile northwest of Pad 25B, as shown on the Cultural Features Map submitted with the Form 2A application. This residential building unit (RBU) is separated from Pad 25B by aspen and spruce forest. Noise from pad construction is not expected to be perceptible at the RBU because of its significant distance from the pad.

The Oil and Gas Location is not in HPH. The location is historically disturbed from human activity, hunting, logging, oil and gas development, and dirt roads. During operation, the location will contain only storage tanks and associated equipment. Routine inspection and maintenance visits will be conducted using a light-duty pickup truck. No processing will occur on the location.

Mapped Rule 1202.d.(2) Elk Production Area HPH is 3,980 feet to the east of the location. The mapped elk habitat is separated from Pad 25B (from west to east) by dense vegetation, a drainage, a ridge, and a drop of approximately 400 feet from the ridge into the next drainage, the Mamm Creek drainage. Based on the distance, intervening topography, and vegetation, it is unlikely that noise would adversely affect wildlife resources. In addition, CPW stated in response to similar operations in the area that "...impacts from noise and light are generally less of a concern for mule deer and elk and CPW does not typically make noise limit recommendations for these species or their associated high priority habitats (CPW Northwest Region Energy Liaison to Terra Energy Partners, January 5, 2022).

There will be no cumulative impacts from noise because of the distance to the nearest residence; separation from HPH by a drainage, ridgeline, an approximately 400-foot drop into the next drainage, and dense vegetation; and the limited vehicle trips during operation.

#### **Light**

There are no RBUs within 2,000 feet, or within 1 mile, of Pad 25B. The nearest RBU is separated from Pad 25B by aspen and spruce forest. Light needed temporarily on the pad will be cast downward. Light is not expected to be perceptible or to pose cumulative impacts because of the significant distance to the RBU and screening from the intervening forest. The Oil and Gas Location is not within HPH.

#### **Odor**

The location will not contain wells or well drilling. Storage tanks will be enclosed. Pre-control for VOCs in recycled produced water will occur at the third-party source of the water. Pre-control for VOCs in water from well completions will occur on CPX's Well Pad 25A. There will be no cumulative impacts from odor because of the controls in place and lack of receptors.

#### **Dust**

The location and access road reroute will be limited to approximately 4.3 acres of disturbance. The Working Pad Surface will be reduced to 1.8 acres during operation. Reclaimed areas will be hydromulched and

seeded. CPX will continue its practice of watering the FS 824 and Tepee Park Ranch road to reduce fugitive dust. Cumulative impacts from dust will be controlled using best management practices (BMPs) listed below and in the operator's Dust, Topsoil, Interim Reclamation, and Stormwater Management Plans.

### **Recreation and Scenic Values**

The location is in remote Garfield County on private property located at an elevation of 9,069 feet. The area is disturbed from historical human activity, hunting, logging, shale excavation, oil and gas development, and dirt roads. The nearest residence is greater than 1 mile northwest. The U.S. Forest Service Battlement Trail is located approximately 1,370 feet (0.26 miles) southeast at its closes point. The trail crosses TPR private property under a CPX perpetual easement. The trail is screened by the distance to the pad and dense vegetation, including aspen and spruce/fir forest. The location is greater than 0.6 miles by road from the nearest public access point. The cumulative impact to recreation and scenic values will be from the extent to which pad construction noise is perceptible or tanks are visible on the pad from vantage points on the trail crossing CPX private property. There are no active, permitted, or proposed oil and gas locations within 1 mile. There are no other nearby state parks, state wildlife areas, trust lands, or designated outdoor activity areas.

### **B. Measures to Avoid or Minimize Cumulative Impacts**

To avoid or minimize public welfare impacts, CPX will:

- Maintain equipment and vehicles in proper working condition to minimize noise.
- Cast lights downward when in use to support operations.
- Require that employees and contractors observe posted speed limits on public roads and a 25 mile per hour speed limit on TPR access roads.
- Use spot graveling to avoid erosion, formation of silts, and to stabilize surfaces for truck travel.
- Use fresh water from an approved water source to wet the surface for control of fugitive dust on the well pad, access road, or pipeline corridor.
- Mound the soil stockpile to prevent loose soils and promote vegetative growth.
- Reclaim the areas not needed to support operations during the first growing season and within 6 months of completing construction.

### **C. Measures to Mitigate or Offset Cumulative Impacts**

To mitigate or offset public welfare impacts, CPX will:

- Comply with the noise levels specified in Rule 423.b.(1).
- Reduce truck traffic by delivering recycled produced water to Pad 25B using CPX's existing 8-inch buried Flexsteel flowline.

### **D. Additional Information**

See detailed information in the Dust Control Plan, Topsoil Protection Plan, and Location Drawing submitted with the Form 2A application.