

From: [Taylor Elm - DNR](#)
To: [Adam Tankersley](#)
Cc: [Jeff Kirtland](#)
Subject: Re: Ryan Gulch Casing Repairs - Rule 312 Consultation
Date: Tuesday, October 11, 2022 9:08:51 AM

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Adam & Jeff,

Thank you for sending this additional information and for answering my questions during our October 6th meeting to discuss these sites in detail. After our discussion and review of the materials, CPW does not have any additional best management practices for TEP to consider during these operations. The BMPs outlined are sufficient to minimize impacts to wintering mule deer in these areas. Furthermore, CPW is in agreement to the proposed schedule for the casing repair activities. We understand that this schedule may be fluid based upon the site-specific conditions that are encountered during the repair work. Given the minimal amount of disturbance associated with a workover rig and the proposed operations, there are no requested changes to the planned schedule.

I have also reviewed these sites for any other sensitive wildlife resources (e.g. raptor nests, bat roosts, etc.) and did not find anything of significance. Lastly, CPW does not have concerns regarding the casing repair work within the sportfish management waters NSO buffer. Given there will be no new ground disturbance or other activities that would impact the waterway, we have no recommended best management practices for this mapped high priority habitat.

If there are any questions regarding this response or needs for additional details, please don't hesitate to reach out. Consider this email as official correspondence and documentation of CPW consultation pursuant to COGCC Rule 312 "Subsequent Operations".

Thank you,

Taylor Elm
NW Region Energy Liaison



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On Mon, Oct 10, 2022 at 3:36 PM Adam Tankersley <ATankersley@terraep.com> wrote:

Taylor,

Thanks for meeting with us on October 6, 2022 to discuss the planned casing repair work in Ryan Gulch. As we discussed TEP Rocky Mountain LLC is requesting consultation as required by COGCC for Rule 312 Subsequent Operations to complete casing repairs on multiple wells within our Ryan Gulch Field. Attached is a preliminary schedule of our planned operations. Please note that this schedule may change based on unanticipated challenges with the casing repair activities. On the attached schedule you will also find details regarding which High Priority Habitat boundaries each of the Oil and Gas Locations are within. The majority of the locations are located with Mule Deer Winter Range and/or

Mule Deer Winter Concentration Areas. The RGU 23-6-297 pad is also located within Aquatic Sport Fish Management Water. Based on the Colorado Parks and Wildlife Recommendation to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado document, CPW recommends a timing limitation beginning December 1 to April 30 for both mule deer HPH boundaries. As a part of the Rule 312 process outlined by COGCC, we are required to attach any agreed upon BMPs that are necessary, and correspondence between CPW and the operator documenting consultation. Based on our conversation, TEP has proposed the following Best Management Practices for implementation during planned activities which will occur during the winter timing limitation to minimize potential impacts to mule deer. However, if additional BMPs are necessary please let me know.

Best Management Practices:

1. Wildlife – Minimization: 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. Wildlife – Minimization: TEP will make best efforts to minimize operations at these location during winter months by conducting operations, when possible, between 9:00am to 4:00pm when wildlife activity minimal.

In the event that additional wells are identified that require subsequent well operations within Mule Deer Winter Range and/or Mule Deer Winter Concentration Areas, the above best management practices would be applied to those activities as well. With your concurrence with these best management practices no further consultation between TEP and CPW would be necessary for subsequent well operations within Mule Deer Winter Range and/or Mule Deer Winter Concentration Areas within the Ryan Gulch area.

Thank you for your attention to this request and please let me know if you have any questions.

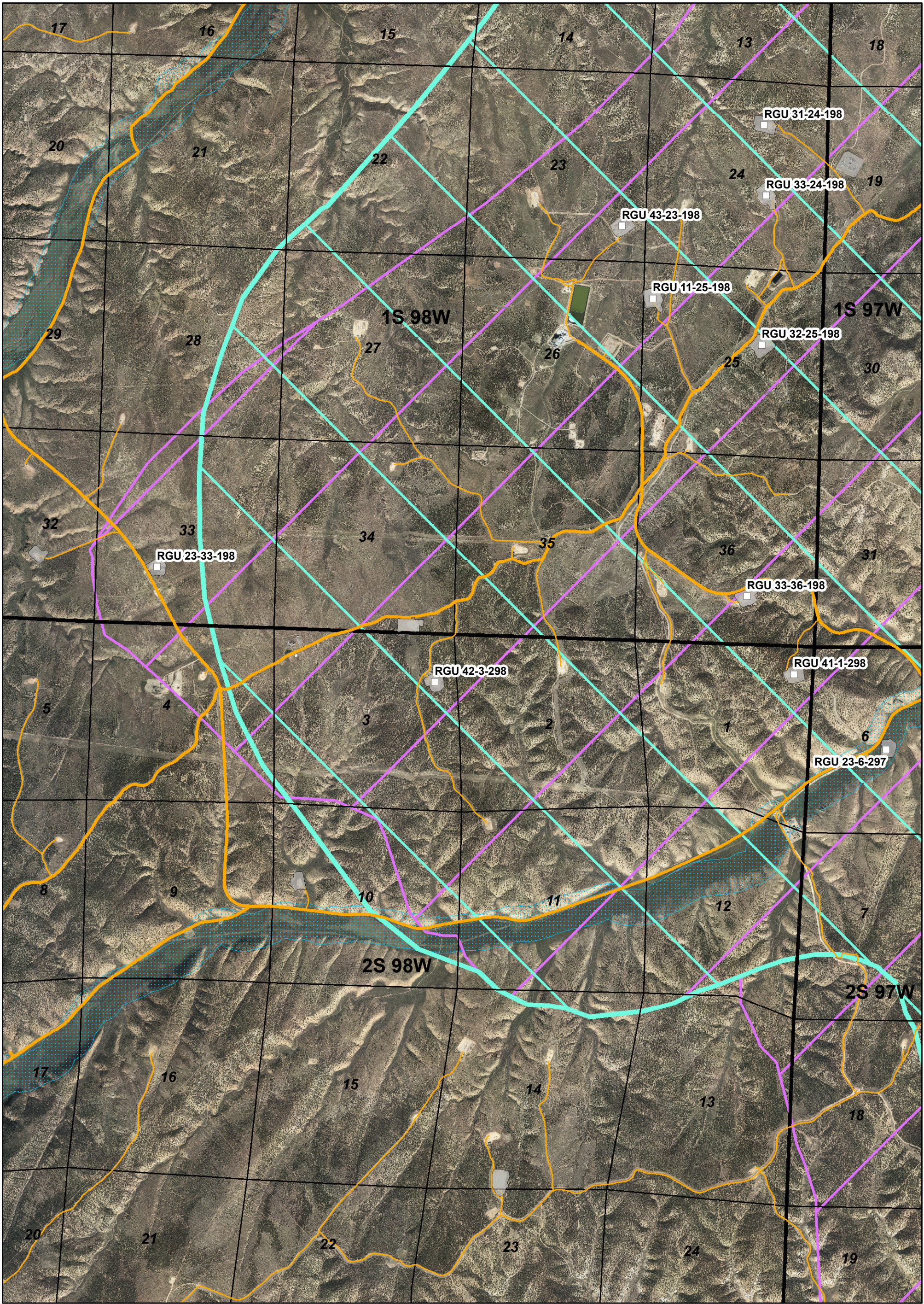
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Legend

- Casing Repair Locations
- Aquatic Sportfish Management Water
- Mule Deer Severe Winter Range
- Mule Deer Winter Concentration Area

TEP Rocky Mountain LLC

Ryan Gulch

Casing Repair Pad Locations

October 10, 2022

Ryan Gulch Casing Repair - Rule 312 Subsequent Well Operations - CPW Consultation					
Pad Name	Planned Work	Estimated Start Date	Estimated End Date	High Priority Habitat	Comment
RGU 43-23-198 PAD	Casing Repair	10/24/2022	11/21/2022	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	No TL Issues
RGU 23-6-297 PAD	Casing Repair	11/25/2022	12/20/2022	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area Aquatic Sportfish Management Water	TL: December 1 - April 30
RGU 42-3-298 PAD	Casing Repair	12/20/2022	1/23/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	TL: December 1 - April 30
RGU 33-36-198 PAD	Casing Repair	1/23/2023	2/14/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	TL: December 1 - April 30
RGU 32-25-198 PAD	Casing Repair	2/14/2023	3/2/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	TL: December 1 - April 30
RGU 23-33-198 PAD	Casing Repair	3/14/2023	3/24/2023	Mule Deer Severe Winter Range	TL: December 1 - April 30
RGU 31-24-198 PAD	Casing Repair	3/24/2023	5/9/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	TL: December 1 - April 30
RGU 11-25-198 PAD	Casing Repair	5/9/2023	6/13/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	TL: December 1 - April 30
RGU 33-24-198 PAD	Casing Repair	6/13/2023	8/2/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	No TL Issues
RGU 41-1-298 PAD	Casing Repair	8/2/2023	8/18/2023	Mule Deer Severe Winter Range Mule Deer Winter Concentration Area	No TL Issues