
WILDLIFE PROTECTION PLAN

GMT EXPLORATION COMPANY LLC

Ragged 6-64 4 Pad

Sec. 4 T6S R64W Lot 1

Elbert County, Colorado

Surface: Fee

Submitted as an accompaniment to the Form 2A Application and
Consistent with the requirements of Rule 1003.

October 19, 2022

GMT Exploration Company LLC Elbert County, Colorado

Wildlife Protection Plan

Project Summary:

GMT Exploration Company LLC's (GMT's) proposed Ragged 6-64 4 Pad "Location" is located in Township 6 South Range 64 West of Section 4 in Elbert County, Colorado. The proposed location is on fee surface with a total Location disturbance of 15.898 acres which includes the active working pad surface area of 9.055 acres. During interim reclamation and production phase 8.919 acres will be reclaimed leaving a disturbed production area of 6.979 acres. Construction is anticipated to begin no sooner than January 2023.

Introduction

The Wildlife Protection Plan serves as a framework for wildlife protection and communication tool to foster cooperative relationships between GMT Exploration Company LLC ("GMT") and its stakeholders. Implementation of this plan will serve to avoid or minimize adverse effects to wildlife populations, and their associated habitats.

This Wildlife Protection Plan addresses GMT's plans to comply with all applicable operating requirements and includes a site-specific environmental site assessment. Additional measures may be implemented based on any new environmental constraints that arise.

Location Description

The location boundaries are defined as the limits of disturbance (LOD) for the proposed expansion of the pad. The location is located in Section 4 of Township 6 South, Range 64 West in Elbert County, Colorado.

Operating Requirements

Below is a review of the operating requirements described in Rule 1202 and GMT's plans to adhere to those which are applicable to the location. GMT's contractors will also comply with all applicable operating requirements.

- A. The operating requirements identified in Rule 1202.a apply to oil and gas operations statewide unless the Operator obtains a signed waiver from Colorado Parks and Wildlife (CPW) and the Director or Commission approves a Form 4, Sundry Notice or Form 2A documenting the relief.

In black bear habitat, Operators will install and utilize bear-proof dumpsters and trash receptacles for food-related trash at all facilities that generate trash.

The Ragged 6-64 4 is not located within black bear habitat

- B. Operators will disinfect water suction hoses and water transportation tanks withdrawing from or discharging into surface waters (other than contained pits) used previously in another river, intermittent or perennial stream, lake, pond, or wetland and discard rinse water in an approved disposal facility. Disinfection practices will be repeated prior to completing work and before moving to the next waterbody. Disinfection will be performed by scrubbing and pre-rinsing equipment away from water bodies to remove all mud, plants, and organic materials and then by implementing one of the following practices.

Spray/soak equipment with a CPW-approved disinfectant solution capable of killing whirling disease spores and other aquatic nuisance species defined by CPW; or

- C. Spray/soak equipment with water greater than 140° Fahrenheit for at least 10 minutes. All equipment and any compartments they contain will be completely drained and dried between each use.

GMT and its vendors will adhere to the above-listed requirements.

- D. At new and existing oil and gas locations, Operators will not situate new staging, refueling, or chemical storage areas within 500 feet of the Ordinary High Water Mark (“OHWM”) of any river, perennial or intermittent stream, lake, pond, or wetland.

The Ragged 6-64 4 location will not locate any staging, refueling, or chemical storage within 500 feet of the OHWM of any river, perennial or intermittent stream, lake, pond, or wetland.

- E. To prevent access by wildlife, including birds and bats, Operators will fence and net or install other CPW-approved exclusion devices on new Drilling Pits, Production Pits, and other Pits associated with oil and gas operations that are intended to contain fluids.

Such fencing and netting or other CPW-approved exclusion device will be installed within 5 days after the cessation of active drilling and completion activities and maintained until the Pit is removed from service and dried or closed pursuant to the Commission’s 900 Series Rules.

The Director may require an operator to fence and net or install other CPW-approved exclusion devices on an existing Pit if the Director determines that the installation is necessary and reasonable to protect Wildlife Resources based on the analysis required by Rule 909.j, or other information that demonstrates additional protections for Wildlife Resources are appropriate.

Operators will properly maintain and repair all fences, nets, and CPW-approved exclusion devices required by this Rule 1202.a.(4).

The Ragged 6-64 4 location will not include Drilling Pits, Production Pits, or other Pits associated with oil and gas operations.

- F. For trenches that are left open for more than five consecutive days during construction of pipelines regulated pursuant to the Commission's 1100 Series Rules, Operators will install wildlife escape ramps at a minimum of one ramp per 1/4 mile of trench.

If a trench is left open for more than five consecutive days during pipeline construction, GMT will install wildlife escape ramps at a minimum of one ramp per ¼ mile of trench.

- G. When conducting interim and final reclamation pursuant to Rules 1003 and 1004, Operators will use CPW-recommended seed mixes for reclamation when consistent with the surface owner's approval and any local soil conservation district requirements.

GMT will use CPW-recommended seed mixes for interim and final reclamation when consistent with the surface owner's approval and any local soil conservation district requirements.

- H. Operators will use CPW-recommended fence designs when consistent with the surface owner's approval and any relevant Local Government requirements.

GMT will use CPW-recommended fence designs when consistent with the surface owner's approval and any relevant Local Government requirements.

- I. Operators 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, Operators may 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, Operators will conduct pre-construction nesting migratory bird surveys within the approved disturbance area prior to any vegetation removal during the nesting season. If active nests are located, Operators will provide work zone buffers around active nests.

GMT 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, GMT may implement appropriate hazing or other exclusion measures prior to April 1. If hazing or other exclusion measures are not implemented, GMT will assign a qualified contractor to conduct pre-construction nesting migratory bird surveys within the approved disturbance area prior to any vegetation removal during the nesting season. If active nest(s) are located, GMT will provide work zone buffers around active nests.

- J. Operators will treat Drilling Pits, Production Pits, and any other Pit associated with oil and gas operations containing water that provides a medium for breeding mosquitoes with Bti (*Bacillus thuringiensis v. israelensis*) or take other effective action to control mosquito larvae that may spread West Nile virus to wildlife resources. Such treatment will be conducted in a manner which will not adversely affect aquatic wildlife resources.

The Ragged 6-64 4 location will not include Drilling Pits, Production Pits, or other Pits associated with oil and gas operations.

- K. Operators will employ the following minimum Best Management Practices on new oil and gas locations with a Working Pad Surface located between 500 feet and 1000 feet hydraulically upgradient from a High Priority Habitat identified in Rule 1202.c.(1). Q–S:
1. Contain flowback and stimulation fluids in tanks that are placed on a Working Pad Surface in an area with downgradient perimeter berming;
 2. 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;
 3. Inspect the oil and gas location on a daily basis, unless the approved Form 2A provides for different inspection frequency or alternative method of compliance;
 4. Maintain adequate spill response equipment at the oil and gas location during drilling and completion operations; and
 5. Not construct or utilize any pits, except that Operators may continue to utilize existing pits that were properly permitted, constructed, operated, and maintained in compliance prior to January 15, 2021.

The Ragged 6-64 4 location is not located between 500 feet and 1000 feet hydraulically upgradient from a High Priority Habitat identified in Rule 1202.c.(1). Q-S.

- L. Operators will bore, rather than trench, flowline and utility crossings of perennial streams identified as aquatic High Priority Habitat unless the Operator obtains a signed waiver from CPW and the Director or Commission approves a Form 4 or Form 2A documenting the relief. When installing culverts or bridges, such structures will not impact or prevent the passage of fish unless otherwise directed by CPW.

Flowlines and utilities associated with the Ragged 6-64 4 location will not cross any perennial streams identified as aquatic High Priority Habitat.

Rules 1202.c and 1202.d describe operating requirements for proposed oil and gas operations that are located within High Priority Habitats. This plan addresses proposed locations that are located outside of High Priority Habitat and, therefore, these rules do not apply to any locations for which this plan is provided.

Protective Measures

Seasonal avoidance of important breeding, nesting, and winter habitats is the primary protection measure to reduce oil and gas development impacts on wildlife populations, productivity, and habitat use. Additional conservation measures will be incorporated through project design and/or as Conditions of Approval (COAs). GMT will also consult CPW when necessary, regarding protection measures. Lastly, data collected during monitoring efforts will be used to determine the appropriateness and effectiveness of these measures throughout GMT's project area. Protection measures may be reduced or adjusted if one or more of the following occur:

- Waiver: A lease stipulation may be waived if a determination is made by COGCC, in consultation with CPW, that the proposed action will not adversely affect the species in question.
- Exception: An exception to these protection measures may be granted by COGCC, in coordination with CPW, if GMT submits a plan which demonstrates that impacts from the proposed action will not be significant or can be adequately mitigated.
- Modification: Modifications may be made by CPW if it is determined that portions of the area do not include habitat protected by the stipulation.

Guidance for preparing Plans of Development (PODs) and/or protective measures applied as COAs provide a full range of practicable means to avoid or minimize harm to wildlife species and their habitats. GMT will minimize potential impacts to wildlife by incorporating general applicable Wildlife Protection Plan programmatic guidance into PODs. Not all measures may apply to each site-specific development area and means to reduce harm are not limited to those identified in the Wildlife Protection Plan. This guidance may change over time if new conservation strategies become available for Special Status Species or monitoring indicates the measure is not effective or unnecessary.

The operating requirements are considered features or project design criteria to be used during POD preparation. The design of projects can incorporate conservation needs for wildlife species or measures can be added as COAs. These types of conservation actions offer flexibility for local situations and help minimize or eliminate impacts to the species of interest.

Summary

The Ragged 6-64 4 location is not located within any mapped High Priority Habitats. Therefore, a Wildlife Mitigation Plan is not needed per 1201.b. and this Wildlife Protection Plan fulfills the obligations of Rule 1201.a. GMT and all associated contractors agree to adhere to all relevant operating requirements outlined in this Wildlife Protection Plan. In addition to the standard operating requirements, supplementary measures and protocols may be implemented in response to specific needs identified at the site.

References and Sources

Bibliography

Colorado Parks and Wildlife (CPW). High Priority Habitat (HPH) data.

Available online at: https://cogccmap.state.co.us/cogcc_gis_online/. Accessed on February 22, 2022.

CPW. 2020. Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors.

Available online at <https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/Raptor-Buffer-Guidelines.pdf>. Accessed on January 4, 2022.