



WILDLIFE MITIGATION PLAN BAJA WEST OGD

Mavericks Pad

Rules 304.c.(17) and 1201.b

October 2024
Revised March 2025

1.0 INTRODUCTION

Kleinfelder, Inc (Kleinfelder) was contracted by Bison IV Operating, LLC (Bison), to complete a Wildlife Mitigation Plan (WMP) for the Baja West Oil and Gas Development Plan (OGDP or Project), which includes the Mavericks Pad (Mavericks Well Pad, or Location). This WMP was developed pursuant to Colorado Energy and Carbon Management Commission (ECMC or Commission) 1200 Series Rules, effective January 15, 2021. Specifically, this WMP addresses ECMC Rules 304.c.(17) and 1201.b for Oil and Gas Sites within High Priority Habitat (HPH). This WMP is site-specific to the proposed Mavericks Location and will apply for the life of the planned development.

2.0 SITE DESCRIPTION AND WILDLIFE HABITATS

The proposed Location is in an area with other existing oil and gas operations as well as agricultural and rangeland activities. Construction of the proposed location, with associated cut and fill slopes, would initially disturb approximately 21.0 acres. Following interim reclamation the total Project residual surface disturbance would be reduced to approximately 7.9 acres.

A total of approximately 5,603 feet of new and existing access road would be required to provide access to the proposed Location. The construction and maintenance of this access road would disturb approximately 2.0 acres of land, 1.5 acres of which would be a residual disturbance for the life of the operation of the wells.

Latitude and longitude coordinates for the approximate center of the Mavericks Well Pad is 40.623560, -104.256837. The legal and location description for the Mavericks Well Pad is summarized in Table 1.

Table 1
Location Information

Location Name	Number of Wells	Legal Description
Mavericks Well Pad	16	NWNW Sec 31 T8N R61W, 6th P.M.

Bison anticipates construction and drillings to begin in the fourth quarter of 2025. Best management practices (BMPs) are described in Section 5.0 and 6.0, including approaches to address noise, sound, light, dust, and odors at the Site.

2.1 WETLANDS AND OTHER SURFACE WATERS

Bison performed a desktop review of environmental resources as well as an on-site assessment for the presence of wetland or waters of the United States (WOUS) at the proposed Mavericks Location. The desktop assessment utilized data obtained from the National Wetland Inventory (NWI) and the National Hydrology Dataset (NHD) and indicated there are no mapped wetlands or WOUS located within the footprint of the proposed Location. According to the desktop assessment, the nearest potential wetland is an NWI-mapped farmed palustrine wetland approximately 3,503 feet to the southwest of the location.

No surface water resources with an ordinary high-water mark (OHWM) were present within 500 feet of the proposed chemical storage area for the Location, therefore, a CPW waiver is not required. The proposed Location is not located within the FEMA 100-year flood zone and would not require a Weld County Floodplain Development Permit. Additionally, there are no public water system intakes located within a mile of the proposed Location.

2.2 HIGH PRIORITY HABITATS

The proposed Mavericks Location does not contain any mapped critical habitat for federally listed species and is not within 0.5 mile of any Colorado Parks and Wildlife (CPW)-mapped raptor nests.

However, the Location and access road are fully within a CPW-mapped HPH, Pronghorn Winter Concentration Area and would initially disturb 21.0 acres for the Well Pad and 2.0 acres for the access road. As construction of the Location will result in the disturbance of HPH, Bison consulted with CPW in October and November of 2024. Bison will also be responsible for payment of direct and indirect compensatory mitigation fees to CPW, which are intended to offset the impacts of disturbance within HPH. Payment will occur at least 30 days prior to ECMC's Notice of Construction. Direct compensatory mitigation fees required for the Mavericks Location can be found below in Table 2:

Table 2
Mavericks Location Direct Compensatory Mitigation Fees

Direct calculation	Proposed pad HPH disturbance acreage	Access road HPH disturbance acreage	Flowlines or other HPH surface disturbance acreage	Total proposed acreage	Base cost (per acre)	Total mitigation costs
Temporary disturbance	13.1	0.5	0	13.6	\$735	\$9,996.00
Permanent disturbance	7.9	1.5	0	9.4	\$5,295	\$49,773.00
Total	21	2.0	0.00	23.0		\$59,769.00

Table 3
Mavericks Location Indirect Compensatory Mitigation Fees

Construction Timing	Fees
May 1 to Dec. 31	\$58,386.56 or 79.44 acres
Jan. 1 to April 30	\$102,176.48 or 139.02 acres

The indirect compensatory mitigation fees, as determined through consultation with the CPW on HPH, are outlined in Table 3. The amount of indirect compensatory mitigation fees will depend on whether Bison constructs, drills, and completes the Mavericks Location during or outside the pronghorn winter season.

- Should Bison conduct mobilization, site pad construction, drilling, and completions to occur outside (May 1 to December 31) the Pronghorn winter season (January 1 to April 30), then Bison will either pay CPW \$58,386.56 at least 30 days before the Form 42 is submitted to ECMC for the Notice of Construction or develop a CPW-approved project for 79.44 acres.
- Should Bison conduct mobilization, site pad construction, drilling, or completions to occur inside/during the Pronghorn winter season (January 1 to April 30), then Bison will either pay CPW \$102,176.48 at least 30 days before the Form 42 is submitted to ECMC for the Notice of Construction or develop a CPW-approved project for 139.02 acres.

Based on Bison's drill schedule and the anticipated start date of Q4 2025, this WMP conservatively assumes that Bison will be mobilizing, constructing the pad, and initiating drilling

of the wells outside of the Pronghorn winter season, but that drilling and completions would be finished during/inside the first part of the Pronghorn winter season. If this is how the schedule occurs, Bison would be responsible for paying CPW the higher dollar value indirect, compensatory mitigation fee of \$102,176.48. However, this will be determined conclusively following OGDPA approval and finalization of Bison’s drill schedule (which is subject to many outside factors such as rig availability). If Bison is able to construct, drill, and complete the wells outside the Pronghorn winter season, they would pay CPW the lower compensatory mitigation fee of \$58,386.56.

Per CPW’s request, the table below reflects the anticipated schedule by project phase, estimated timeframes, and truck trips by project phase.

TIMELINE

Pending approval from ECMC and Weld County, the project schedule is as follows:

Phase	Duration (days)	Estimated Start Date	# of Roundtrips (per day)
Construction	+/- 20 days	4th Quarter 2025 (November)	57
Drilling	+/- 96 days	4th Quarter 2025 (December)	24
Completions and Flowback	+/- 60 days	1st Quarter 2026 (February)	57-231

**or the first favorable weather/growing season.*

2.2 ALTERNATIVE LOCATION ANALYSIS

Pursuant to Rule 304.b.(2).B, an Alternative Location Analysis (ALA) was completed. Bison began the ALA process by identifying potential sites within and adjacent to the Drill Spacing Unit (DSU) from which the targeted minerals in the DSU can be accessed. Bison did not identify any technically feasible alternative locations that more successfully avoided potential impacts to receptors. Please refer to the Form 2A for the full ALA narrative.

3.0 COLORADO ENERGY AND CARBON MANAGEMENT COMMISSION 1202 OPERATING REQUIREMENTS

In accordance with ECMC 1202, Operating Requirements (2021), Bison will maintain compliance with applicable operating requirements as outlined below:

Yes/ Correct	No	N/A	Operating Requirement
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	304.c.(17) This Wildlife Mitigation Plan satisfies Rule 304.c.(17) and 1201.b.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(1) The Site is not within black bear habitat.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(2) The Site will not withdraw from or discharge into surface waters; therefore, the Site will not be required to disinfect water suction hoses and water transportation tanks. All wastewater will be transported and disposed of at an approved disposal facility.

Yes/ Correct	No	N/A	Operating Requirement	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(3)	Unless a waiver is obtained, Bison will not situate new staging, refueling, or chemical storage areas within 500 feet of the OHWM. In addition, the Site will implement and maintain BMPs to minimize erosion, transport of sediment, and site degradation.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(4)	Bison does not use open top drilling pits, production pits, or other open top pits associated with oil and gas operations that are intended to contain fluids.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1202.a.(5)	Bison will install wildlife escape ramps at a minimum of one ramp per 0.25 mile of trench that may be exposed for more than 5 consecutive days.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(6)	Pursuant to Rules 1003 and 1004, during interim and final reclamation, Bison will use seed mixes that are approved by surface owners, meet local conservation district requirements, and incorporate CPW recommendations.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(7)	Where fencing is necessary, the fencing design will comply with CPW's Fencing with Wildlife in Mind guidance (Hanophy 2009).
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(8)	Bison will comply with CPW guidelines, which includes the following on avoidance, vegetation clearing, and surveys:

General Avoidance and Minimization

Clearing and grubbing or brush hogging of vegetative cover should be conducted between September 1st and December 31st to avoid impacts or hazards to raptors and migratory birds. If clearing and grubbing or brush hogging cannot be completed prior to the primary migratory bird nesting season (March 1 to August 31) or the typical raptor and eagle nesting season (February 1 to July 31), a migratory bird nest survey must be conducted. If the vegetative cover is agricultural land, rangeland, or native grassland (with minimal cover), a trained Bison employee can perform the survey within 7 days of the clearing activities and in accordance with the Bison Energy MBTA and Raptor Survey Protocol.

If the site is more heavily vegetated with brush, shrubs, and/or trees, then consideration will be given to having a biologist conduct the MBTA survey within 7 days prior to land clearing or construction start.

Yes/
Correct No N/A Operating
Requirement

Raptor Nests

Before commencing land clearing or construction (including grubbing and brush hogging) during the typical raptor nesting season (February 1 to July 31), a raptor nest survey must be conducted in suitable raptor habitat (i.e., large trees, cliffs, rock outcrops) within 0.5 miles of the proposed construction location.

In Colorado, if an active raptor nest is located within 0.5 mile of the proposed construction location, consult the CPW recommendations for spatial and temporal restrictions which vary by species.

Eagle Nests

Before commencing land clearing or construction (including grubbing and brush hogging) during eagle nesting season (December 1 to July 31), an eagle nest survey must be conducted in suitable eagle habitat (rock outcrops, cliffs, ridges, stream banks, mature trees, dead standing trees, and manmade structures such as power poles) within 0.5 mile of the proposed construction location.

If an active or inactive bald or golden eagle nest is located within 0.5 mile of the proposed construction location, then the surveyor must contact the Bison Energy EHS representative for appropriate avoidance and monitoring guidance.

Migratory Bird Nests

Before commencing land clearing or construction (including grubbing and brush hogging) during migratory bird nesting season (March 1 – August 31), a nest survey must be conducted in suitable migratory bird habitat (grasslands, riparian areas, woodlands, cultivated crops, hayed/pastures, and shrub/scrub) within a 50-foot buffer of the proposed construction location.

If an active nest of a migratory bird, other than a raptor or bald or golden eagle, is located within a 50-foot buffer of the proposed construction location, then the nest must be visibly marked, and avoided and contact a Bison Energy EHS representative for appropriate avoidance and monitoring guidance. Additional monitoring will be required to determine when the nest is no longer active.

Once an area has been surveyed for active migratory birds and raptor nests in accordance with the Bison MBTA and Raptor Survey Protocol and none are found, Bison Energy will have 7 days to complete clearing/grubbing and/or commence construction. Once an area is cleared/grubbed, no further surveys will be needed as long as additional vegetation growth does not establish within those areas prior to construction.

Yes/ Correct	No	N/A	Operating Requirement
			If an area is not cleared/grubbed within 7 days following the migratory bird nest survey, an additional survey will be required for that area.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(9) Bison does not use open top drilling pits, production pits, or other open top pits associated with oil and gas operations that are intended to contain fluids.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.a.(10) The Location is not between 500 feet and 1000 feet hydraulically upgradient from an HPH identified in Rule 1202.c.(1).Q–S.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1202.b The Location will not include any flowline or utility crossings of perennial streams.

4.0 BEST MANAGEMENT PRACTICES (MINIMIZATION MEASURES)

BMPs to protect pronghorn will be discussed with CPW and will be implemented at the Location as required; if specific BMPs are identified during CPW consultation they will be added to this WMP following ECMC's Completeness Review. Additional general operating requirements applicable to the Location to protect wildlife habitat and resources, include the following standards and practices:

- Using as much of the existing access road in Section 25 as possible to reduce new fragmentation;
- Implementing pipeline takeaway which will significantly reduce truck traffic within the HPH;
- Consolidating and centralizing fluid collection and distribution facilities to minimize impact to wildlife.
- Adequately sizing infrastructure and facilities to accommodate both current and future gas production.
- Implementing fugitive dust control measures.
- Installing screening or other devices on the stacks and on other openings of heater treaters or fired vessels to prevent entry by migratory birds.
- Minimizing rig mobilization and demobilization by completing or re-completing all wells from a given well pad before moving rigs to a new location.
- Mowing or brush hogging vegetation where appropriate, leaving root structure intact, instead of scraping the surface, where allowed by the surface owner.
- Using topographic features and vegetative screening to create seclusion areas, where acceptable to the surface owner.
- Using remote monitoring of well production to the extent practicable.
- Installing automated emergency response systems (e.g., high tank alarms, emergency shutdown systems).

5.0 MITIGATION MEASURES

5.1 NOISE CONTROL

Mavericks Ambient Noise

Since there are no RBUs within 2,000 feet of the working pad surface, there is no regulatory requirement for either noise regulation to conduct a baseline ambient sound level survey for the proposed Mavericks Location. Correspondingly, since there are no qualifying RBUs/BUs within 2,000 feet of the location, operations at the proposed Mavericks Pad are very low risk with respect to environmental noise as a nuisance impact on the surrounding area. Therefore, a baseline ambient sound level survey was not conducted for the Mavericks Location.

Mavericks Noise Impact Assessment

Urban conducted a NIA for the proposed Mavericks Location using a three-dimensional computer noise modeling software. The results of this assessment will compare the predicted sound levels of the Mavericks Location drilling and operations to the permissible noise level limits described in the Colorado ECMC Rule 423 noise regulations.

Results for unmitigated drilling, completions, and production operations only include sound levels from operations and do not include ambient noise or noise contribution from other sources outside of the planned operations.

The results of the unmitigated noise modeling indicated that all phases (drilling, completions, flowback, and production) will comply with the maximum permissible noise levels of ECMC. The BMPs that Bison plans to implement for the proposed Mavericks Location are as follows:

- Soundwalls will only be installed if construction, drilling, or completion takes place during the pronghorn winter season, or if Weld County requires them. Provided utility line power is available, Bison will use electric-powered drilling and completion rigs. Thus, the gensets that normally operate during all drilling operations will be completely shut down and only used run for emergency backup in the case that the electric grid is temporarily unavailable.
- Bison will utilize a low noise completions fleet for all completions operations.
- Flowback operations and equipment were reviewed as part of this NIA. Flowback utilizes a fraction of similar but smaller equipment compared to the three other operations studied. No mitigation is required for flowback operations.
- If the drilling rig or completions fleet is changed prior to commencement of operations, mitigation measures employed will be equally or more protective. A sundry form will be submitted to outline any changes, per code, as required.
- Bison will post contact information to receive and address noise complaints arising from preproduction operations around the clock, 24 hours, 7 days per week. Upon receipt of a complaint, either directly to Bison, from the Colorado ECMC, or from Weld County, a Bison representative will contact the associated stakeholder within 48 hours of receipt.

Based on the results of the modeling and that Bison will site drilling and production equipment at the well pad in a manner to minimize impacts to the surrounding area, drilling, completions, and operation of production equipment at the Mavericks Location is not likely to result in adverse impacts on receptors. In the event of a noise related complaint from the public Bison would evaluate potential mitigation measures to reduce production related noise, as needed.

5.2 VISUAL IMPACTS

The production facilities will be painted in accordance with ECMC Rule 804 regarding Visual Mitigation, which states: “Production facilities, regardless of construction date, which are observable from any public highway shall be painted with uniform, non-contrasting, non-reflective color tones (similar to the Munsell Soil Color Coding System), and with colors matched to but slightly darker than the surrounding landscape.”

5.3 LIGHTING

Bison’s development of the Mavericks Location would require work activities to be performed 24 hours per day during drilling, completion, drill-out, and flowback stages; all of which require the use of temporary lighting. Lighting needed for these activities would conform to nationally recognized industry and federally mandated safety standards. However, during nighttime work activities, lighting required for safe operations may be observed from locations beyond the boundaries of the well pad site. As such, nighttime drilling and completion activities would result in a short-term contribution to cumulative light pollution within the CIAA. However, the light pollution Best Management Practices would be used to minimize light impacts during all phases of the Mavericks Pad’s proposed operations, including precautions to ensure that site lighting does not directly shine outside of the site boundaries, which would decrease potential light impacts on nearby wildlife receptors.

- Light fixtures with switches, sensors, and timers mounted on the equipment will be angled in a downward direction.
- Bison will use LED fixtures, as feasible, to reduce skyglow.
- Bison will position lights in a downward direction where vertical light is not required.
- Bison will angle light away from off-site buildings.
- Bison will reduce lighting within well pad to the minimal level for safe pre-production activity.
- Bison will direct lights to drilling and completion tasks only.

During production, operations would typically only occur during daylight hours. Minimal permanent lighting is anticipated on site during production operations. Therefore, there would be little or no long-term contribution to cumulative light pollution within the CIAA from the Mavericks Location.

5.4 ODOR AND DUST

All requirements applicable to ECMC regulations related to odor and dust will be adhered to by Bison. No noxious, prolonged, or unusually high amounts of odor are expected from proposed drilling of the wells. Oil and gas facilities and equipment shall be operated in such a manner that odors and dust do not constitute a nuisance or hazard to public welfare. Bison shall employ practices for control of fugitive dust caused by operations, which may include but are not limited to treating roads and location with water, the use of speed restrictions, regular road maintenance, and silica dust controls when handling sand used in hydraulic fracturing operations.

6.0 REFERENCES

Colorado Energy and Carbon Management Commission. Available from:
<https://ECMC.state.co.us/reg.html#/rules>

Colorado Parks and Wildlife’s Recommendations to Avoid and Minimize Impacts from Land Use

Development in Colorado. 2023. Available from:
https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf

Hanophy, Wendy. 2009. Fencing with Wildlife in Mind. Colorado Parks and Wildlife. Available from:
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