

From: [Lilah Hubbard](#)
To: [Marette - DNR, Brandon](#)
Cc: [Nathan Bennett](#); [Scott Farkas](#); [Jeff Annable](#); [Dan Harrington](#); [Logan McConnell](#)
Subject: Re: State Wetterhorn/Handies & State Harvard/Yale
Date: Wednesday, August 28, 2024 4:10:55 PM
Attachments: [Outlook-bf5fitti.png](#)
[Outlook-44w1fu3v.png](#)
[Outlook-yw5d1ye3.png](#)
[Crestone_StateWetterhornHandies_WildlifeMitigationPlan_OGDP_20240828.pdf](#)
[Crestone_StateHarvardYale_WildlifeMitigationPlan_OGDP_20240828.pdf](#)
[State_Wetterhorn-Handies_Trip_Generation_Table.pdf](#)
[State_Harvard-Yale_Trip_Generation_Table.pdf](#)

Good afternoon, Brandon,

Thank you for your feedback on these WMPs. The plans have been updated accordingly (attached), and I've provided responses to your comments below in [blue](#).

Please let us know if you have any questions.

Thank you again,

Lilah Hubbard

Natural Resource Specialist

Cell 510-734-4733

555 17th Street | Suite 3700 | Denver, CO | 80202

www.civitasresources.com | NYSE: CIVI



From: Marette - DNR, Brandon <brandon.marette@state.co.us>

Sent: Monday, August 5, 2024 5:00 PM

To: Lilah Hubbard <lhubbard@civiresources.com>

Cc: Nathan Bennett <nbennett@civiresources.com>; Scott Farkas <sfarkas@civiresources.com>; Jeff Annable <jannable@civiresources.com>; Dan Harrington <dharrington@civiresources.com>; Logan McConnell <logan@hwa-wildlife.com>

Subject: Re: State Wetterhorn/Handies & State Harvard/Yale

Good afternoon Lilah,

Thanks for pinging me on this matter, plus your patience with my reply, esp. with the attention I have to give to the Lowry hearing.

Thanks for these updated direct impact tables, I agree with those calculations. I have also verified the indirect numbers that Civitas has chosen for both locations.

Re: both WMPs & BMPs,

- Per PDF pages 5-6; it's CPW's expectation that Civitas will treat the water after being sourced from a 3rd party. Please revise. [Updated \(Sec 3.a.2\)](#).
- What is the expected length of fencing? [Approximately 2231'](#) for Harvard/Yale, and [approximately 2609'](#) for Wetterhorn/Handies. (Note: these numbers have not been added directly into the WMPs - we purposely refrain from including precise numbers derived from other exhibits/plans in case there are

minor adjustments made throughout the permit preparation. This aligns with ECMC's preference too based on discussions in past Operator Meetings). And will it be wildlife-friendly? Yes – updated in Sec 3.a.7 (based on CPW's guidance doc and discussions with the rancher and SLB).

- What's the current schedule for development look like? (e.g., will 1 of the 3 phases be outside the HPH season?) Please include the most current schedule of the three phases (e.g., Mobilization & Site Pad Construction Q4 2024). Added (near end of Sec 3).
- Help me understand the amount of light & heavy truck traffic, and when the spike in PW will occur (e.g., lots of heavy truck PW takeaway during the HPH season)? I have attached the current traffic estimates (subject to change slightly). Peak water is anticipated to occur outside the pronghorn winter season - this info and related COA from CAP Hearing has been added (near end of Sec 3).
- Will Civitas commit to directing the lighting during development activities away from the HPH (e.g., only in the LOD; pointing inward on the walls)? Added (near end of Sec 3).
- Re: Table 3 - Swift Fox Dens - these den surveys should be focused between April - July, not year-round. I understand "presence/sighting of SF" could be done over a wider period, but please ensure future den surveys are focused in that time frame. Updated, per separate email discussion (Sec 11, Table 3).
- Please revise this sentence in both WMPs - "Should the schedule change to allow all operations three phases of development to occur outside the Jan. 1 - April 30 timeframe, Crestone will pay the lower indirect impact fee" Updated.

Regards,

Brandon B. Marette, CWB®
Northeast Region Energy Liaison



Direct [\(720\) 880-0819](tel:7208800819)
[6060 Broadway, Denver, CO 80216](https://www.cpw.state.co.us)
brandon.marette@state.co.us
[CPW's Energy Webpage](#)
[CPW's Wildlife Movements Webpage](#)



THINK SAFETY FIRST!



On Mon, Aug 5, 2024 at 9:56 AM Lilah Hubbard <lhubbard@civiresources.com> wrote:

Good morning Brandon,

Following up on this - please just let us know if you have any questions about these locations or WMPs.

Thank you!

Lilah Hubbard

Natural Resource Specialist

Cell 510-734-4733

555 17th Street | Suite 3700 | Denver, CO | 80202



From: Lilah Hubbard

Sent: Thursday, July 18, 2024 3:53 PM

To: Marette - DNR, Brandon <brandon.marette@state.co.us>

Cc: Nathan Bennett <nbennett@civiresources.com>; Scott Farkas <sfarkas@civiresources.com>; Jeff Annable <jannable@civiresources.com>; Dan Harrington <dharrington@civiresources.com>; Logan McConnell <logan@hwa-wildlife.com>

Subject: State Wetterhorn/Handies & State Harvard/Yale

Good afternoon Brandon,

Please find below a recap of our consultations for the State Wetterhorn/Handies and State Harvard/Yale locations. Additionally, Wildlife Mitigation Plans (WMPs) for each location are attached for your review. These two WMPs will be submitted together in one OGD application.

State Wetterhorn/Handies and State Harvard/Yale Project Recaps:

- Operator: Crestone Peak Resources Operating, LLC (wholly owned subsidiary of Civitas Resources, Inc.; hereafter "Crestone").
- These projects are part of the proposed Lowry Ranch Comprehensive Area Plan (CAP).
- On-site consultation with CPW occurred on 04/01/2024.
- These locations are in Sec 21 (State Wetterhorn/Handies) and Sec 8 (State Harvard/Yale) of T5S R64W in Arapahoe County.
- Crestone is proposing up to 20 wells at State Wetterhorn/Handies and up to 18 wells at State Harvard/Yale.
- Both locations overlap a Pronghorn Winter Concentration Area HPH.
- Development operations at both locations are currently scheduled to partially overlap the pronghorn wintering season (will be moved entirely out of the season if option becomes available).
- State Land Board's (surface owner) preferred seed mix will be used during reclamation.

Best Management Practices (BMPs):

- **Avoidance**
 - Crestone is using existing main access roads in Lowry Ranch.
 - Crestone will be partially avoiding operations during the pronghorn wintering season (based on current schedule).
 - Additional wildlife surveys (e.g., migratory bird surveys) will be conducted by third-party biologists prior to the start of construction, based on seasonal applicability, to ensure avoidance of impacts to other wildlife species.
- **Minimization**
 - A full-wrap sound wall will be used during development operations overlapping the pronghorn wintering season to significantly minimize noise and light impacts.
 - Both locations will use gas and oil takeaway pipelines.
 - There will be no permanent lighting.
 - Permanent production facilities will be powered by utility power.
- **Mitigation**

Crestone will pay direct impact mitigation fees to CPW, based on the calculation tables below (note: some of the acreage values below have been updated since previous communications):

State Wetterhorn/Handies						
Direct Calculation	Proposed pad disturbance acreage	Access road disturbance acreage	Flowlines	Total proposed acreage	Base cost (per acre)	Total mitigation costs
			or other HPH surface disturbance acreage			
Temporary Disturbance	23.46	0.00	11.73	35.19	\$735.00	\$25,864.65
Permanent Disturbance	4.94	1.20	0.00	6.14	\$5,295.00	\$32,511.30
Total	28.40	1.20	11.73	41.33		\$58,375.95

State Harvard/Yale						
Direct Calculation	Proposed pad disturbance acreage	Access road disturbance acreage	Flowlines	Total proposed acreage	Base cost (per acre)	Total mitigation costs
			or other HPH surface disturbance acreage			
Temporary Disturbance	21.90	0.00	1.65	23.55	\$735.00	\$17,309.25
Permanent Disturbance	4.49	1.70	0.00	6.19	\$5,295.00	\$32,776.05
Total	26.39	1.70	1.65	29.74		\$50,085.30

- Crestone will pay the following indirect mitigation fees to CPW:
 - **State Wetterhorn/Handies: \$89,715.94** (based on current schedule overlapping pronghorn winter season)
 - If the schedule changes to avoid operations during the pronghorn winter season, Crestone will pay a reduced fee of \$51,266.25.
 - **State Harvard/Yale: \$81,741.19** (based on current schedule overlapping pronghorn winter season)
 - If the schedule changes to avoid operations during the pronghorn winter season, Crestone will pay a reduced fee of \$46,709.25.
- Crestone will pay the direct and indirect mitigation fees no less than 30 days prior to submitting the respective Form 42s.

Please let us know if you have any questions or feedback.

Thank you for your time,

Lilah Hubbard

Natural Resource Specialist

Cell 510-734-4733

555 17th Street | Suite 3700 | Denver, CO | 80202

www.civitasresources.com | NYSE: CIVI

