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**RE: CDOW General BMPs for 35-D2 Pad and those Specific to Elk Production**

**Specific to Elk Production:**

In a good faith effort Noble Energy or subcontractor will conduct post-development well site visitations between the hours of 9:00 a.m. and 4:00 p.m. and reduce well site visitations between May 15 and June 15 in elk production areas. On the occasion that well conditions are not stabilized Noble can continue to work past 4:00 p.m. (This is not a timing restriction for activities between May 15-June 15)

Control weeds in areas surrounding reclamation areas in order to reduce weed competition.

Avoid aggressive non-native grasses and shrubs in elk habitat restoration.

Reclaim elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed.

**General Areawide BMPs for all wildlife:**

- Attempt Phased Development emphasizing the following operational highlights for maximum wildlife mitigation for the life of the project:
  - Multi-well pads on sectional drilling for one-time surface disturbance and interim reclamation
  - No more than 3-4 drill rigs in the area at any given time (average 1-2)
  - Semi-closed and/or closed mud loop system
  - Gathering lines buried adjacent to or in the road, where possible

- Engineered pads with erosion control measures taking into account nearby wildlife and riparian habitat
- Initiate interim reclamation as soon as possible
- Educate employees and contractors about specific wildlife issues:
  - No fishing in Battlement Creek
  - Use bear-proof containers for all human-related trash
  - Pay close attention to vehicle traffic and speeds during the three critical hours surrounding the dusk and dawn hours
  - Maintaining a single use/ clean hose for drawing water from local sources to prevent cross-contamination with diseases and bacteria. (Noble does not have any water rights of their own and relies on contractor water rights for fresh water. 99% of this water comes from a single extraction point of the Colorado River.)
- Continue conversations with private landowners to:
  - Restrict access with gates and/or incorporate speed limit signs
  - Control hunting and over-grazing
  - Suggest overgrowth vegetation control with chippers/ hydro-axing (if convenient while clearing a pipeline anyway)
- Add CDOW to SPCC Notification List
- Maintain a Land Management Prescription for the Noble Surface Area
  - Controlled Access – locked gates at four locations (or more):
    - SWSE of Section 26 of T7S, R95W
    - SENE Section 25 of T7S, R95W
    - SWSE of Section 25 of T7S, R95W
    - NWNE of Section 36 of T7S, R95W
  - Possible mobile guard shack depending on situation

Thank you and please do not hesitate to call with any questions,

Yours truly,



Judi Kohn  
Environmental Compliance Coordinator