

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Wednesday, April 02, 2014 2:33 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: CPW Recommended BMPs for Review

**Scan No 2106971**  
**2A#400521270**

**CPW CORRESPONDENCE and PROPOSED BMPs**

**2A#400565389, 2A#400518030,**

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**From:** Taylor Elm - DNR [mailto:[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)]  
**Sent:** Wednesday, April 02, 2014 10:54 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** Fwd: CPW Recommended BMPs for Review

Below is concurrence from EE3 for BMPs on three of their Jackson County Form2As:

Surprise Central Facilities - Doc#: 400565389  
Ray Ranch North Central Facilities - Doc#: 400518030  
Grizzly Pad - Doc#: 400521270

Let me know if there's any questions. I should get these entered before the end of the day. Thanks.

### Taylor Elm

Land Use Specialist, NW Region  
Colorado Parks and Wildlife  
0088 Wildlife Way  
Glenwood Springs, CO 81601  
(970) 947-2971  
[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)

----- Forwarded message -----

**From:** Doug Sandridge <[dsandridge@ee3llc.com](mailto:dsandridge@ee3llc.com)>  
**Date:** Tue, Apr 1, 2014 at 9:55 AM  
**Subject:** RE: CPW Recommended BMPs for Review  
**To:** Taylor Elm - DNR <[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)>

OK.....the suggested BMP's are satisfactory.

**Douglas C. Sandridge**  
**Vice President - Land**

**4410 Arapahoe Avenue**  
**Suite 100**  
**Boulder, Colorado 80303**  
**[303.305.1103](tel:303.305.1103) Direct**  
**[303.330.4847](tel:303.330.4847) Cell**



**From:** Taylor Elm - DNR [mailto:[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)]  
**Sent:** Monday, March 31, 2014 4:25 PM  
**To:** Doug Sandridge  
**Subject:** Re: CPW Recommended BMPs for Review

Doug,

1. For raptor perch deterrents we'd be looking for anything to discourage birds from perching on these facilities and preying on grouse eggs, chicks, and adults. This location is very much within nesting habitat for the Ptar lek to the south, so this would be good to have. I attached a document from NRCS with a little about deterrents on fence posts. A simple nail or two on top of wooden posts could suffice or the "bird spikes" commonly used in urban areas for pigeons (shown in picture). The link provides an idea for what type of devices could be used on any raised surface that could be used by perching raptors.

<http://www.absolutebirdcontrol.com/products/bird-spikes>

2. Correct, the mufflers would not apply to the electric motors. If the electric motor will supply power for all operations, then this BMP will not be applicable.

**Taylor Elm**

Land Use Specialist, NW Region  
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On Mon, Mar 31, 2014 at 3:36 PM, Doug Sandridge <[dsandridge@ee3llc.com](mailto:dsandridge@ee3llc.com)> wrote:  
Can you please confirm questions below in red?

**From:** Taylor Elm - DNR [mailto:[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)]  
**Sent:** Monday, March 31, 2014 2:01 PM  
**To:** Doug Sandridge

**Subject:** CPW Recommended BMPs for Review

Hi Doug,

I have approved our end of the Form 2A permits for the Surprise Unit 2-08H and Spicer Pad locations. There were no additional wildlife BMPs necessary due to BLM's stipulations placed on the federal leases and APDs.

For the remaining 3 Form 2A permit locations, we have prepared the following BMPs for your review and concurrence or for further discussion:

## **Surprise Central Facilities**

**Wildlife Concerns:** This location is within greater sage-grouse sensitive wildlife habitat (SWH) and within 1.5 miles of an active lek location (Ptar Lek). Given these wildlife concerns, CPW recommends the following best management practices (BMPs) to be implemented at this location:

1. Where oil and gas construction activities must occur within 4 miles of greater sage-grouse leks or within other mapped greater sage-grouse breeding or summer habitat, conduct these activities outside the period between March 1 and June 30.
2. Restrict site visitations to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to May 15).
3. Operator will utilize a combustion chamber or enclosed flaring device for elimination of gases encountered during drilling and production. Avoiding traditional flaring techniques at this location will help mitigate the effects of fugitive light and noise on wildlife.
4. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads. Slow speeds and increased awareness among employees and contractors traveling to and from the site should help to reduce impacts.
5. Install raptor perch deterrents on equipment, fences (can you please clarify what is intended as a perch deterrent on a fence post?), cross arms and pole tops in greater sage-grouse habitat. Furthermore, design tanks and other facilities with structures such that they do not provide perches or nest substrates for raptors, crows, and ravens.

## **Ray Ranch North Central Facilities**

**Wildlife Concerns:** This location is within greater sage-grouse sensitive wildlife habitat (SWH) and is approximately 2.3 miles from an active greater sage-grouse lek (Railroad New Lek). Given the proximity of this location to State Highway 14, CPW recommends the following wildlife BMPs:

1. Use hospital grade mufflers for compressors, pump jacks, or other motors necessary to run operations at this site. Mufflers will be pointed upward to dissipate potential vibration. (obviously this would not apply to electric motors.....correct?)
2. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.
3. Install and utilize bear-proof dumpsters and trash receptacles for all food-related trash on location, following COGCC Rule 1204 a-1.

*\* CPW appreciates the use of this central facilities location to reduce truck traffic to and from individual well pad locations.*

## **Grizzly Pad**

In addition to the BMPs supplied by the operator on the submitted Form 2A, CPW recommends one additional BMP to adequately address wildlife concerns at this location:

1. Operator will utilize a combustion chamber or enclosed flaring device for elimination of gases encountered during drilling and production. Avoiding traditional flaring techniques at this location will help mitigate the effects of fugitive light and noise on wildlife.

I apologize for the lengthy email. Let me know if there are any questions regarding these.

Thanks,

**Taylor Elm**

Land Use Specialist, NW Region  
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