

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Saturday, August 27, 2016 2:01 PM
To: Dave Kubeczko - DNR
Subject: FW: <EXTERNAL> Sandridge Active Form2As - Best Management Practices

Categories: CPW Wildlife Information

Scan No. 2107915 CPW CORRESPONDENCE and BMPs 2A# 401073954
2A# 401080879
2A# 401071101

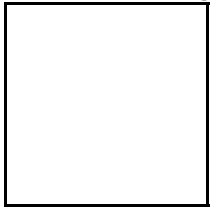
From: Taylor Elm - DNR [mailto:taylor.elm@state.co.us]
Sent: Thursday, August 25, 2016 8:45 AM
To: Dave Kubeczko - DNR
Subject: Fwd: <EXTERNAL> Sandridge Active Form2As - Best Management Practices

Dave,

See below for BMP concurrence from Sandridge for the 3 active permits in North Park. We've agreed to their amended BMP regarding noise mitigation for the Judy and Open Range locations. Let me know if there are any questions. Otherwise, I'll get these entered by the end of the day and approve the 2As.

Thanks,

Taylor Elm
Land Use Specialist
Northwest Region



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

From: Spence Laird <slaird@sandridgeenergy.com>
Date: Thu, Aug 25, 2016 at 8:35 AM
Subject: RE: <EXTERNAL> Sandridge Active Form2As - Best Management Practices
To: Taylor Elm - DNR <taylor.elm@state.co.us>, Alex Rizzo <arizzo@sandridgeenergy.com>
Cc: Michael Warren - DNR <michael.warren@state.co.us>

Thank you to all!

Spence Laird



From: Taylor Elm - DNR [mailto:taylor.elm@state.co.us]
Sent: Thursday, August 25, 2016 9:30 AM
To: Alex Rizzo
Cc: Spence Laird; Michael Warren - DNR
Subject: Re: <EXTERNAL> Sandridge Active Form2As - Best Management Practices

Alex,

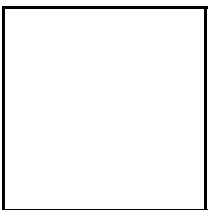
Thank you for the quick response and discussion on this. Michael and I talked yesterday and think that the measures you have outlined to minimize noise at the edge of the pad to 75 dBA will be acceptable for these two locations. I'll go ahead and enter the BMPs we have agreed upon and approve our end of the Form2A permits. If there are any other questions or concerns, feel free to get in touch.

Take care,

Taylor Elm

Land Use Specialist

Northwest Region



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On Thu, Aug 25, 2016 at 5:18 AM, Alex Rizzo <arizzo@sandridgeenergy.com> wrote:

Hey Taylor – in regard to the below email, SandRidge does not believe Best Management Practice (BMP) number two (2) or four (4) for the Judy Saltwater Disposal Well (Judy) and Open Range 18 Pad (OP18), respectively, are practicable or feasible. It would be very difficult to standardize a pre or post -development measurement because there would be daily and even hourly fluctuations in ambient noise levels. The Judy is approximately one (1) mile from the edge of the 0.6 mile buffer and OP18 is approximately 2,300 feet from that buffer. Over that distance, any number of factors can influence ambient noise levels (e.g. wind, wildlife, traffic, etc.) and it would be practicably infeasible for SandRidge to attempt to account for those factors. Additionally, 10 dBA is roughly equivalent to the sound of a pin dropping and we believe that standard too restrictive to accurately measure and apply given the above stated concerns about variables and distance.

SandRidge would like to propose an alternative BMP that we believe complies with the spirit of what CPW is asking while being practicably implementable. **We propose to keep noise levels at 75 dBA or less at the edge of our pad site.** This will be achieved by measurements taken at the edge of the pad closest to the lek after construction is completed. Noise levels will be controlled via compressor sheds, hospital-grade mufflers, sound walls (if needed), or other accepted methods. Natural acoustic attenuation will reduce noise levels considerably before reaching the edge of the lek buffer.

This complies with the lower limits currently imposed by the COGCC for industrial activities in the 800 series rules (“Aesthetic and Noise Control Regulations”). Although not directly applicable, this is also in line with what is required for other grouse species (Lesser Prairie-Chicken) in the WAFWA Range-Wide Plan.

Please let me know if you have any questions or concerns. We look forward to hearing back from you.

Thank you!

Alex Rizzo

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"Once we accept our limits, we go beyond them." – Albert Einstein

From: Taylor Elm - DNR [mailto:taylor.elm@state.co.us]
Sent: Tuesday, August 23, 2016 1:37 PM
To: Alex Rizzo; Spence Laird
Cc: Michael Warren - DNR
Subject: <EXTERNAL> Sandridge Active Form2As - Best Management Practices

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Hi Alex and Spence,

CPW staff has been working to review the three active Form2A permits that have been recently submitted by Sandridge: Judy SWD Well, Open Range 18 Pad, and amended Bighorn 0780 17 location. The following best management practices (BMPs) are recommended by CPW to avoid and minimize impacts to wildlife and their habitats. I'm emailing them for your review and concurrence, or further discussions if needed.

Bighorn 0780 17 (addition of a well at the already approved central facilities location)

1. No additional recommendations beyond what was discussed during our onsite visit. Containment and spill prevention will be important to protect the nearby waterway.

Judy Saltwater Disposal Well

1. The operator agrees to conduct all construction and drilling activities outside the period between March 1 and June 30.
2. The operator agrees to limit noise to 10 dBA above pre-development background levels at the margin of leks (0.6 mile) during the lekking and nesting seasons (March 1-June 30).

3. The operator agrees to restrict waste water hauling and other needed site visits at this location to portions of the day between 9:00 a.m. and 4:00 p.m. year-round. Additionally, during the lekking, nesting and early brood rearing seasons (March 1 to June 30) water hauling and other needed site visits will be limited to the hours of 10:00 a.m. to 3:00 p.m.
4. The operator agrees (with landowner consent) to reclaim/restore greater sage-grouse habitats with native shrubs, grasses and forbs identified by CPW that contribute to optimal greater sage-grouse habitat and other wildlife appropriate to the ecological site.
5. The operator agrees to preclude the use of aggressive non-native grasses in greater sage-grouse habitat reclamation.

Open Range 18 Pad

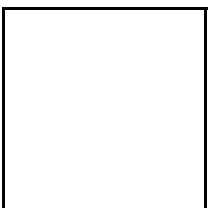
1. If oil and gas operations must occur within 4.0 miles of greater sage-grouse leks, the operator agrees to conduct oil and gas operations outside the period between March 1 and June 30.
2. The operator will utilize a high pressure combustor instead of open flaring.
3. The operator and its contractors agree to minimize well site visitations by installing automated equipment. Necessary well site visits will be limited to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking, nesting and early brood rearing seasons (March 1 to June 30) within 4.0 miles of a lek.
4. The operator agrees to limit noise to 10 dBA above pre-development background levels at the margin of leks (0.6 mile) during the lekking and nesting seasons (March 1-June 30).
5. The operator agrees (with landowner consent) to reclaim/restore greater sage-grouse habitats with native shrubs, grasses and forbs identified by CPW that contribute to optimal greater sage-grouse habitat and other wildlife appropriate to the ecological site.
6. The operator agrees to preclude the use of aggressive non-native grasses in greater sage-grouse habitat reclamation.

Thanks, we appreciate your cooperation! Let myself or Michael know if there are any questions or need for clarification.

Taylor Elm

Land Use Specialist

Northwest Region



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