



Upon Receipt of Field Inspection Form Document Number 718800046, Bison started planning and execution of topsoil salvage on the Triggerfish Pad access road. Detail of topsoil salvage work is below. This work was done voluntarily and as an act of good faith as Bison disagrees that it is out of compliance with ECMC Rule 1002.b.(2) or our Topsoil Protection Plan as approved by ECMC as part of the OGDG on May 20, 2024.

Based on the introduction language of the 1000 series rule, which establishes the scope of the rule and the definition of Oil and Gas Operations, it is not clear to Bison that the access road to Triggerfish is subject to Rule 1002.b.(2).

The introduction to the 1000 series rules states, "The rules and regulations of this series establish the proper reclamation of the land and soil affected by oil and gas operations and ensure the protection of the topsoil of said land during such operations. The surface of the land shall be restored as nearly as practicable to its condition at the commencement of drilling operations".

Oil and gas operations are defined by ECMC as, "means exploring for oil and gas, including conducting seismic operations and the drilling of test bores; siting, drilling, deepening, recompleting, reworking, or abandoning a well; producing operations related to any well, including installing flowlines; the generating, transporting, storing, treating, or disposing exploration and production wastes; and any constructing, site preparing, or reclaiming activities associated with such operations." This definition does not include access roads or access road grading activities.

Access Road construction consist of grubbing and grading only and not excavation. Access road requirements are called out in Rule 1002.e.(4) with its own set of rules for surface disturbance minimization. This is consistent with the ECMC Topsoil Protection Plan created on March 25, 2022, which does not mention a requirement for boring holes or topsoil mitigation for access roads.

Lastly, as mentioned above, the Topsoil protection plan for this location submitted on October 2023 and approved by the ECMC in May 2024 does not include the access road. Based on ECMC access road regulation, ECMC topsoil protection guidance and Bison's approved topsoil protection plan, the Triggerfish access road construction as outlined in the approved plan is protective of topsoil and the environment.



Topsoil work has been undertaken voluntarily and as an act of good faith upon receipt of Field Inspection Form Document Number 718800046. This work will not be complete by March 21, 2025, due to the amount of planning work that needs to be completed as this was not part of the approved OGD. This planning work includes but is not limited measurement of the the area of disturbance and receiving approvals from landowners to widen the footprint of the disturbance to account for topsoil storage on the side of the road. Bison anticipates that topsoil removal and stockpiling will be complete by the end of day Tuesday March 25, 2025.

The plan for this topsoil salvage work will be separating and storage of the topsoil horizon. This soil will be stockpiled on the side of the access road. Bison piloted this on a roughly 200-foot section of road to understand of the amount of topsoil that will need to be stockpiled. A picture of this pilot is below.

This land occupied by the access road has multiple landowners and stockpiling next to the road minimizes Bison's footprint and does not intermingle soil.

Topsoil on the side of the road will be compacted such that it will not be impacted by wind erosion and is prepared for mulching and seeding to further prevent erosion the maintain the soil in place until reclamation is required at the end of the pad's lifespan.



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