

APPENDIX I

STANDARD OPERATING PROCEDURES

Gathers would be conducted by utilizing contractors from the Wild Horse and Burro Gathers-Western States Contract, or BLM personnel. The following procedures for gathering and handling wild horses and burros would apply whether a contractor or BLM personnel conduct a gather.

Prior to any gathering operation, the BLM will provide for a pre-capture evaluation of existing conditions in the gather area(s). The evaluation will include animal conditions, prevailing temperatures, drought conditions, soil conditions, road conditions, and preparation of a topographic map with wilderness boundaries, the location of fences, other physical barriers, and acceptable gather site locations in relation to animal distribution. The evaluation will determine whether the proposed activities will necessitate the presence of a veterinarian during operations. If it is determined that capture operations necessitate the services of a veterinarian, one would be obtained before the capture would proceed. The contractor will be apprised of all conditions and will be given instructions regarding the capture and handling of animals to ensure their health and welfare is protected.

Gather sites and temporary holding sites will be located to reduce the likelihood of undue injury and stress to the animals, and to minimize potential damage to the natural and cultural resources of the area. Temporary holding sites would be located on or near existing roads.

The primary capture methods used in the performance of gather operations include:

1. Bait Trapping. This capture method involves utilizing bait (water or feed) to lure wild horses and burros into a temporary gather site.

The following procedures and stipulations will be followed to ensure the welfare, safety and humane treatment of wild horses and burros in accordance with the provisions of 43 CFR § 4700.

B. Capture Methods Used in the Performance of Gather Contract Operations

The primary concern of the contractor is the safety of all personnel involved and humane handling of all wild horses and burros captured:

- a) Some trap sites will require a staging area (Temporary Holding) as determined by the COR/PI.
- b) All trap and staging areas locations must be approved by the Contracting Officer's Representative (COR) and/or the Project Inspector (PI) prior to construction. The Contractor may also be required to change or move trap locations as determined by the COR/PI. All traps and staging facilities not located on public land must have prior written approval of the landowner.

- c) The capture attempts may be accomplished by utilizing bait (feed, mineral supplement or water) or sexual attractants (mares in heat) to lure wild horses and burros into a temporary trap.

All capture attempts shall incorporate the following:

1 - All feed bait ingredients, and the formula in that bait will be given to the COR/PI one full week prior to using in the trap.

2 - When using water as the bait, other water sources shall not be cut off in the bait area. If the government determines that cutting off other water sources is the best action to take under this contract, elimination of other water sources shall not last longer than 48 continuous hours.

- d) All traps, wings, and staging facilities shall be constructed, maintained and operated to handle the wild horses and burros in a safe and humane manner and be in accordance with the following:

1 - Darting of wild horses and wild burros will not be allowed.

2 - Traps and staging facilities shall be constructed of portable panels or equal material, the top of which shall not be less than 72 inches high for horses and 60 inches for burros, and the bottom rail of which shall not be more than 12 inches from ground level. All traps and staging facilities shall be flowing design without corners. All material used will be flush at the top and bottom, no protrusions, sharp areas.

3 - No barbed wire material shall be used in the construction of any traps.

4 - All loading alleys shall be a minimum of 6 feet high for horses and 5 feet high for burros and shall be fully covered on the sides with, tarps, plywood, etc.

5 - All crowding pens including the gates leading to the alleyways shall be covered with a material which serves as a visual barrier, (plywood, burlap, plastic snow fence, tarps etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level for burros and 2 feet to 6 feet for horses. Perimeter panels on the staging corrals shall be covered to a minimum height of 5 feet for burros and 6 feet for horses.

6 - Self-latching gates will be used on all pens and alleyways for the movement and handling of wild horses and burros.

7 - No modification of existing fences will be made without authorization from the COR/PI. The Contractor shall be responsible for restoration of any fence modification which he has made.

8 - Wild horses and burros trapped at trap sites may need to be sorted into small sorting pens determined by age or sex in order to safely transport them to a BLM preparation facility or a staging area.

9 - Sick and injured wild horses and burros, and strays will be separated as needed. Segregation will be at the discretion of the COR.

10 - Wild horses and burros will not be held in the trap for more than 24 hours.

11 - A staging area will be required away from the trap site for any wild horses and burros that are being held for more than 24 hours.

12 - The contractor shall assure that wet mares and their foal shall not be separated.

13 - Finger gates may be constructed of materials such as, juniper poles, pipe, etc., only with the prior approval and direction of the COR. Finger gates shall not be constructed of materials such as "T" posts, sharpened willows, etc. that may be injurious to wild horses and burros.

14 - All trigger and/or trip gate devices must be approved by the COR prior to capture of wild horses and burros.

15 - Traps shall be checked a minimum of once every 24 hours when traps are "set" to capture

wild horses and burros.

16 - Contractor will report any injuries that resulted from trapping operations as well as pre-existing injuries to the COR and BLM preparation facility.

17 - The COR/PI may assist with the handling of wild horses and burros.

e. At the discretion of the COR/PI the Contractor may be required to delay shipment of horses until the COR/PI inspects the wild horses and burros at the trap site prior to transporting them to the BLM preparation facility.

C. Temporary Holding and Animal Care

The temporary holding facility area will only be used when approved by the COR

- a) Sorting pens shall be of sufficient size to minimize (minimal 100 square feet per adult horse and or burro with only having a maximum of 25 wild horses or burros being held at any other time), to the extent possible, injury due to fighting and trampling as well as to allow wild horses and burros to move easily and have adequate access to water and feed.
- b) All pens will be capable of expansion on request of the COR. Alternate pens, within the staging facility shall be furnished by the Contractor to separate mares or Jennies with small foals, sick and injured wild horses and burros, and estrays from the other wild horses and burros.
- c) The Contractor shall provide wild horses and burros held in the staging area with a supply of fresh clean water at a minimum rate of 10 gallons per animal per day.
- d) Wild horses and burros approved to be held by the COR will be provided good quality hay at the rate of not less than two pounds of hay per 100 pounds of estimated body weight per day. If the task order notes that weed free hay is to be used for this bait trap gather the contractor will provide certified weed free hay in the amounts stated above. The contractor will have to have documentation that the hay is certified weed free.
- e) It is the responsibility of the Contractor to provide security to prevent loss, injury or death of captured wild horses and burros until delivery to final destination. Animals lost from traps shall not be included in payment schedule.
- f) It is the responsibility of the Contractor to provide for the safety of the wild horses and burros and personnel working at the trap locations and staging area.
- g) The Contractor shall restrain sick or injured wild horses and burros if treatment is necessary in consultation with the COR and/or veterinarian. The contractor in consultation with the COR will determine if injured wild horses and burros must be destroyed and provide for destruction of such wild horses and burros in accordance with the BLM Euthanasia policy. (Section J) The Contractor will have the ability to humanely euthanize wild horses and burros in the field and to dispose of the carcasses in accordance with state and local laws.
- h) Separate water troughs shall be provided for each pen where wild horses and burros are being held. Water troughs shall be constructed of such material (e.g., rubber, plastic, fiberglass, galvanized metal with rolled edges, and rubber over metal) so as to avoid injury to the wild horses and burros.
- i) The use of solid covered panels or visual barriers in the alley ways keeps the animals from kicking thru the panels.
- j) All gates and panels are covered with snow fence for the safety of wild horses and burros.

- k) Wild horses and burros will be fed twice a day per a schedule determined by the COR/PI and will have water in every pen.

D. Transportation and Animal Care

- a) Wild horses and burros shall be transported to BLM preparation facilities within 24 hours after capture unless prior approval is granted by the COR/PI for unusual circumstances.
- b) The Contractor shall schedule shipments of wild horses and burros to arrive at BLM preparation facilities between 7:00 a.m. and 4:00 p.m. unless prior approval has been obtained by the COR. No shipments shall be scheduled to arrive at BLM preparation facilities on Sunday and Federal holidays; unless prior approval has been obtained by the COR.
- c) Wild horses and burros shall not be allowed to remain standing on gooseneck or semi-trailers while not in transport for a combined period of greater than three (3) hours.
- d) Total drive time from the trap site or staging area to the BLM preparation facilities will not exceed 8 hours.
- e) All motorized equipment employed in the transportation of captured wild horses and burros shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of wild horses and burros.
- f) All equipment used to transport wild horses and burros will be inspected and accepted by the COR/PI prior to use to avoid any injury to wild horses and burros and shall be in good mechanical condition, of adequate rated capacity, and operated so as to ensure that captured wild horses and burros are transported without undue risk.
- g) No open stock trailers shall be allowed for transporting wild horses and burros from trap site(s) or staging area to the BLM preparation facilities.
- h) Sides or stock racks of all trailers used for transporting wild horses and burros shall be a minimum height of 6 feet 6 inches from the floor. A minimum of one partition is required in each stock trailer.
- i) The rear door(s) of the stock trailers must be capable of opening the full width of the trailer. All partitions and panels the inside of all trailers must be free of sharp edges or holes that could cause injury to the wild horses and burros. The material facing the inside of all trailers must be strong enough so that the wild horses and burros cannot push their hooves through the side.
- j) All surfaces of the stock trailers shall be cleaned and a disinfectant used to eliminate the possibility of disease transmittal from domesticated horses to wild horses and burros (WH&B's) prior to the WH&B's under this contract being transported.
- k) Floors of stock trailers and loading chutes shall be covered and maintained with anti-slip materials (mats, wood shavings, sand etc.) to prevent wild horses and burros from slipping.
- l) Wild horses and burros to be loaded and transported in any size trailer shall be as directed by the COR and may include limitations on numbers according to age, sex, size, temperament and animal condition. The following minimum square feet per animal shall be allowed in all trailers

1. 12.6 square feet per adult horse (1.8 linear foot in a 7 foot wide trailer)
2. 8.0 square feet per adult burro (1.15 linear foot in a 7 foot wide trailer)
3. 6.0 square feet per horse foal (0.85 linear foot in a 7 foot wide trailer)
4. 4.0 square feet per burro foal (0.57 linear feet in a 7 foot wide trailer)

- m) The COR shall consider the condition and size of the wild horses and burros, weather conditions, distance to be transported, or other factors when planning for the movement of captured wild horses and burros. The COR shall provide for any brand and/or inspection services required for the captured wild horses and burros. If wild horses and burros are to be transported over state lines the COR will be responsible work with the receiving state veterinarian to get permission to transport the wild horses and burros without a health certificate or coggins test. If the receiving state does not allow wild horses or burros in their state without a current health certificate or coggins test the COR/PI will obtain them through a local veterinarian prior to shipment.
- n) An electric prod, paddle or wild rag may be humanely used to work wild horses and burros during sorting and loading operations.
- o) Flagging will be used strategically so not to desensitize the animal(s).
- p) When transporting wild horses and burros, drivers shall check for downed animals.
- q) The contractor will separate the animals in trailer compartments so animals do not pile up in the rear of the trailer during transport from trap site to staging area/BLM preparation facility. Separation of animals helps prevent animals from falling down and being trampled.
- r) All sorting, loading or unloading wild horses and burros will be performed during daylight hours unless supplemental light is provided in the area to facilitate visibility.
- s) Provide a visual barrier on panels in the area where the loading is accomplished at the trap site and at the staging area to eliminate holes, gaps, or openings where horses can be injured.
- t) The contractor may dig holes at the end of the loading alley so that trailer floor is at ground level to ease the loading horses or burros at the trap site
- u) Hot shots should not be used routinely or excessively on wild horses or burros. Use of hot shots should be limited to instances of trying to protect or preserve human or animal safety (such as with animals that are down and reluctant to get up on trailers and in chutes) or as a near final resort for animals that refuse to move or load. Hot shots should only be used as follows:
- v) Hotshots should never be applied to 3 areas: the head (defined as everything above the throatlatch), anus and genitals (this includes the vulva, penis, and scrotum as well as the anogenital area which includes the anal recess, underside of the tail and the perineum which is the area between the anus and the vulva)
- w) Only unmodified, commercially available hotshots that use DC battery power may be used, batteries should be maintained fresh at all times to avoid the overuse of apparently ineffective devices
- x) A hot shot should only be used after 3 other stimuli have failed to successfully encourage forward movement (other options include use of body position and

movement, use of voice or whistle, use of a wild rag to flag an animal, use of a shaker paddle as a visual and auditory stimulus, tapping animal with flag or shaker paddle, use of plastic tarp or bag, and returning animal to the point of origin and starting over.

- y) A hot shot should be used to shock an animal not more than 3 times on any single occasion
- z) A hot shot should only be used when a path of escape or movement away from the stimulus is available (animals should not be encouraged to “push-up” with or without a hotshot – this too often leads to trampling)

E. Safety and Communication

The BLM/FS reserves the right to remove from service immediately any contractor personnel or contractor furnished equipment which, in the opinion of the contracting officer or COR violate contract rules, are unsafe or otherwise unsatisfactory. In this event, the Contractor will be notified in writing to furnish replacement personnel or equipment within 48 hours of notification. All such replacements must be approved in advance of operation by the Contracting Officer or his/her representative

- a) The Contractor shall have the means to communicate with the COR/PI and all contractor personnel engaged in the capture of wild horses and burros utilizing a cell/satellite phone at all times during the trapping operations.
- b) Contractor will contact the COR/PI prior to loading horses to be delivered to BLM preparation facility.
- c) Contractor will contact BLM facility manager to schedule delivery and relay information of wild horses and burros trapped (number of wild horses and burros trapped, sex, approximate age, number of pairs, etc.)
- d) Contractor will photo document all horses trapped in a digital image format and digital photos will be delivered to the COR.
- e) Contractor will be required to provide State or National Rifle Association certification or equivalent (conceal carry, hunter safety, etc.) for firearm safety.
- f) All accidents involving wild horses and burros or people that occur during the performance of any task order shall be immediately reported to the COR/PI.
- g) All domestic stock used for or around the bait trap or staging area will have current Coggins documentation and a health certificate. Trailers will be cleaned and have a disinfectant applied after any domestic horses have been hauled in it and before any WH&B's are loaded. This will help prevent transmission of disease into our populations at a BLM Preparation Facility

F. Use of Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals. The Contractor shall provide the COR/PI with a current safety inspection (less than one year old) for all motorized equipment and tractor-trailers used to transport animals to final destination.

2. All motorized equipment, tractor-trailers, and stock trailers shall be in good repair, of adequate rated capacity, and operated so as to ensure that captured animals are transported without undue

risk or injury.

3. Only tractor-trailers or stock trailers with a covered top shall be allowed for transporting animals from gather site(s) to temporary holding facilities and from temporary holding facilities to final destination(s). Sides or stock racks of all trailers used for transporting animals shall be a minimum height of 6 feet 6 inches from the floor. Single deck tractor-trailers 40 feet or longer shall have two (2) partition gates providing three (3) compartments within the trailer to separate animals. Tractor-trailers less than 40 feet shall have at least one partition gate providing two (2) compartments within the trailer to separate the animals. Compartments in all tractor-trailers shall be of equal size plus or minus 10 percent. Each partition shall be a minimum of 6 feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck tractor-trailers is unacceptable and shall not be allowed.

4. All tractor-trailers used to transport animals to final destination(s) shall be equipped with at least one (1) door at the rear end of the trailer which is capable of sliding either horizontally or vertically. The rear door(s) of tractor-trailers and stock trailers must be capable of opening the full width of the trailer. Panels facing the inside of all trailers must be free of sharp edges or holes that could cause injury to the animals. The material facing the inside of all trailers must be strong enough so that the animals cannot push their hooves through the side. Final approval of tractor-trailers and stock trailers used to transport animals shall be held by the COR/PI.

5. Floors of tractor-trailers, stock trailers and loading chutes shall be covered and maintained with wood shavings to prevent the animals from slipping.

6. Animals to be loaded and transported in any trailer shall be as directed by the COR/PI and may include limitations on numbers according to age, size, sex, temperament and animal condition. The following minimum square feet per animal shall be allowed in all trailers: 11 square feet per adult horse (1.4 linear foot in an 8 foot wide trailer); 8 square feet per adult burro (1.0 linear foot in an 8 foot wide trailer); 6 square feet per horse foal (.75 linear foot in an 8 foot wide trailer); 4 square feet per burro foal (.50 linear feet in an 8 foot wide trailer).

7. The COR/PI shall consider the condition and size of the animals, weather conditions, distance to be transported, or other factors when planning for the movement of captured animals. The COR/PI shall provide for any brand and/or inspection services required for the captured animals.

8. If the COR/PI determines that dust conditions are such that the animals could be endangered during transportation, the Contractor will be instructed to adjust speed.

G. Safety and Communications

1. The Contractor shall have the means to communicate with the COR/PI and all contractor personnel engaged in the capture of wild horses and burros utilizing a VHF/FM Transceiver or VHF/FM portable Two-Way radio. If communications are ineffective the government will take steps necessary to protect the welfare of the animals.

- a) The proper operation, service and maintenance of all contractor furnished property are the responsibility of the Contractor. The BLM reserves the right to remove from service any contractor personnel or contractor furnished equipment which, in the opinion of the contracting officer or COR/PI violate contract rules, are unsafe or otherwise unsatisfactory. In this event, the Contractor will be notified in writing to furnish replacement personnel or equipment within 48 hours of notification. All such replacements must be approved in advance of operation by the Contracting Officer or his/her representative.

- b) The Contractor shall obtain the necessary FCC licenses for the radio system
- c) All accidents occurring during the performance of any task order shall be immediately reported to the COR/PI.

H. Public and Media

Due to heightened public interest in wild horse and burro gathers, the BLM/Contractor may expect an increasing number of requests from the public and media to view the operation.

- a) Due to this type of operation (luring wild horses and burros to bait) spectators and viewers will be prohibited as it will have impacts on the ability to capture wild horses and burros. Only essential personnel (COR/PI, veterinarian, contractor, contractor employees, etc.) will be allowed at the trap site during operations.
- b) Public viewing of the wild horses and burros trapped may be provided at the staging area and/or the BLM preparation facility by appointment.
- c) The Contractor agrees that there shall be no release of information to the news media regarding the removal or remedial activities conducted under this contract.
- d) All information will be released to the news media by the assigned government public affairs officer.
- e) If the public or media interfere in any way with the trapping operation, such that the health and wellbeing of the crew, horses and burros is threatened, the trapping operation will be suspended until the situation is resolved.

I. COR/PI Responsibilities

- a) In emergency situations, the COR/PI will implement procedures to protect animals as rehab is initiated, ie. Rationed feeding and watering at trap and or staging area.
- b) The COR/PI will authorize the contractor to euthanize any wild horse or burros as an act of mercy.
- c) The COR/PI will ensure wild horses or burros with pre-existing conditions are euthanized in the field according to BLM policy.
- d) Prior to setting up a trap or staging area on public land, the BLM and/or Forest Service will conduct all necessary clearances (archaeological, T&E, etc.). All proposed sites must be inspected by a government archaeologist or equivalent. Once archaeological clearance has been obtained, the trap or staging area may be set up. Said clearances shall be arranged for by the COR/PI.
- e) The COR/PI will provide the contractor with all pertinent information on the areas and wild horses and burros to be trapped.
- f) The COR/PI will be responsible to establish the frequency of communicating with the contractor.
- g) The COR/PI shall inspect trap operation prior to Contractor initiating trapping.
- h) The Contractor shall make all efforts to allow the COR/PI to observe a minimum of at least 25% of the trapping activity.
- i) The COR/PI is responsible to arrange for a brand inspector and/or veterinarian to inspect all wild horses and burros prior to transporting to a BLM preparation facility when legally required.

- j) The COR/PI will be responsible for the establishing a holding area for administering PZP, gelding of stallions, holding animals in poor condition until they are ready of shipment, holding for EIA testing, etc.
- k) The COR/PI will ensure the trailers are cleaned and disinfected before WH&B's are transported. This will help prevent transmission of disease into our populations at a BLM Preparation Facility.

J. Responsibility and Lines of Communication

The Elko/Ely Wild Horse Specialist (COTR) or delegate has direct responsibility to ensure human and animal safety. The Wells or Egan Field Managers will take an active role to ensure that appropriate lines of communication are established between the field, field office, state office, national program office, and BLM holding facility offices. All employees involved in the gathering operations will keep the best interests of the animals at the forefront at all times. All publicity and public contact and inquiries will be handled through the Elko District Office and Nevada State Office of Communications. These individuals will be the primary contact and will coordinate with the COR on any inquiries.

The BLM delegate will coordinate with the corrals to ensure animals are being transported from the capture site in a safe and humane manner and are arriving in good condition.

The BLM require humane treatment and care of the animals during removal operations. These specifications are designed to minimize the risk of injury and death during and after capture of the animals. The specifications will be vigorously enforced.

K. Resource Protection

Gather sites and holding facilities would be located in previously disturbed areas whenever possible to minimize potential damage to the natural and cultural resources.

Gather sites and temporary holding facilities would not be constructed on wetlands or riparian zones.

Prior to implementation of gather operations, gather sites and temporary holding facilities would be evaluated to determine their potential for containing cultural resources. All gather facilities (including gather sites, gather runways, blinds, holding facilities, camp locations, parking areas, staging areas, etc.) that would be located partially or totally in new locations (i.e. not at previously used gather locations) or in previously undisturbed areas would be inventoried by a BLM archaeologist or district archaeological technician before initiation of the gather. A buffer of at least 50 meters would be maintained between gather facilities and any identified cultural resources.

Gather sites and holding facilities would not be placed in known areas of Native American concern.

The contractor would not disturb, alter, injure or destroy any scientifically important paleontological remains; any historical or archaeological site, structure, building, grave, object or

artifact; or any location having Native American traditional or spiritual significance within the project area or surrounding lands. The contractor would be responsible for ensuring that its employees, subcontractors or any others associated with the project do not collect artifacts and fossils, or damage or vandalize archaeological, historical or paleontological sites or the artifacts within them. Should damage to cultural or paleontological resources occur during the period of gather due to the unauthorized, inadvertent or negligent actions of the contractor or any other project personnel, the contractor would be responsible for costs of rehabilitation or mitigation. Individuals involved in illegal activities may be subject to penalties under the Archaeological Resources Protection Act (16 U.S.C 470ii), the Federal Land Management Policy Act (43 U.S.C 1701), the Native American Graves and Repatriation Act (16 U.S.C. 1170) and other applicable statutes.

Standard Operating Procedures for Population-level Porcine Zona Pellucida Fertility Control Treatments

22-Month Time-Release Pelleted Porcine Zona Pellucida (PZP) Vaccine:

The following implementation and monitoring requirements are part of any Action Alternative which involves the use of PZP:

1. PZP vaccine would be administered only by trained BLM personnel or collaborating research partners.
2. The fertility control drug is administered with two separate injections: (1) a liquid dose of PZP is administered using an 18-gauge needle primarily by hand injection; (2) the pellets are preloaded into a 14-gauge needle. These are delivered using a modified syringe and jab-stick to inject the pellets into the gluteal muscles of the mares being returned to the range. The pellets are designed to release PZP over time similar to a time-release cold capsule.
3. Mares that have never been treated would receive 0.5 cc of PZP vaccine emulsified with 0.5 cc of Freund's Modified Adjuvant (FMA) and loaded into darts at the time a decision has been made to dart a specific mare. Mares identified for re-treatment receive 0.5 cc of the PZP vaccine emulsified with 0.5 cc of Freund's Incomplete Adjuvant (FIA).
4. Delivery of the vaccine would be by intramuscular injection into the gluteal muscles while the mare is restrained in a working chute. With each injection, the liquid or pellets would be injected into the left hind quarters of the mare, above the imaginary line that connects the point of the hip (hook bone) and the point of the buttocks (pin bone).
5. In the future, the vaccine may be administered remotely using an approved long range darting protocol and delivery system if or when that technology is developed.
6. All treated mares would be freeze-marked on the hip or neck HMA managers to positively identify the animals during the research project and at the time of removal during subsequent gathers.

Monitoring and Tracking of Treatments:

1. At a minimum, estimation of population growth rates using helicopter or fixed-wing surveys would be conducted before any subsequent gather. During these surveys it is not necessary to identify which foals were born to which mares; only an estimate of population growth is needed (i.e. # of foals to # of adults).
2. Population growth rates of herds selected for intensive monitoring would be estimated every year post-treatment using helicopter or fixed-wing surveys. During these surveys it is not necessary to identify which foals were born to which mares, only an estimate of population growth is needed (i.e. # of foals to # of adults). If, during routine HMA field monitoring (on-the-ground), data describing mare to foal ratios can be collected, these data should also be shared with the NPO for possible analysis by the USGS.

3. A PZP Application Data sheet would be used by field applicators to record all pertinent data relating to identification of the mare (including photographs if mares are not freeze-marked) and date of treatment. Each applicator would submit a PZP Application Report and accompanying narrative and data sheets would be forwarded to the NPO (Reno, Nevada). A copy of the form and data sheets and any photos taken would be maintained at the field office.

4. A tracking system would be maintained by NPO detailing the quantity of PZP issued, the quantity used, disposition of any unused PZP, the number of treated mares by HMA, field office, and State along with the freeze-mark(s) applied by HMA and date.

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