

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
Buffalo Field Office  
Buffalo, Wyoming**

**SURFACE USE  
CONDITIONS OF APPROVAL**

POD Name: Cabin Creek Phase II

Operator: Pinnacle Gas Resources, Inc.

List of Wells:

	Well Name	Well #	Qtr/Qtr	Sec.	TWP	RNG	Lease #
1	Cabin Creek II CB	17CC-30	NENW	30	57N	76W	WYW141873
2	Cabin Creek II CB	17WP-30	NENW	30	57N	76W	WYW141873
3	Cabin Creek II CB	18CC-30	NWNW	30	57N	76W	WYW151717
4	Cabin Creek II CB	18WP-30	NWNW	30	57N	76W	WYW151717
5	Cabin Creek II CB	21CC-30	SWNW	30	57N	76W	WYW151717
6	Cabin Creek II CB	21WP-30	SWNW	30	57N	76W	WYW151717
7	Cabin Creek II CB	25CC-30	NWSW	30	57N	76W	WYW151717
8	Cabin Creek II CB	25WP-30	NWSW	30	57N	76W	WYW151717
9	Cabin Creek II CB	*13CC-12	SWSW	12	57N	77W	WYW144218
10	Cabin Creek II CB	*13WP-12	SWSW	12	57N	77W	WYW144218
11	Cabin Creek II CB	01CC-13	NENE	13	57N	77W	WYW147350
12	Cabin Creek II CB	01WP-13	NENE	13	57N	77W	WYW147350
13	Cabin Creek II CB	03CC-13	NENW	13	57N	77W	WYW144218
14	Cabin Creek II CB	03WP-13	NENW	13	57N	77W	WYW144218
15	Cabin Creek II CB	07CC-13	SWNE	13	57N	77W	WYW147350
16	Cabin Creek II CB	07WP-13	SWNE	13	57N	77W	WYW147350
17	Cabin Creek II CB	09CC-13	NESE	13	57N	77W	WYW144218
18	Cabin Creek II CB	09WP-13	NESE	13	57N	77W	WYW144218
19	Cabin Creek II CB	13CC-13	SWSW	13	57N	77W	WYW147350
20	Cabin Creek II CB	13WP-13	SWSW	13	57N	77W	WYW147350
21	Cabin Creek II CB	01CC-14	NENE	14	57N	77W	WYW144219
22	Cabin Creek II CB	01WP-14	NENE	14	57N	77W	WYW144219
23	Cabin Creek II CB	03CC-14	NENW	14	57N	77W	WYW149974
24	Cabin Creek II CB	03WP-14	NENW	14	57N	77W	WYW149974
25	Cabin Creek II CB	05CC-14	SWNW	14	57N	77W	WYW149974
26	Cabin Creek II CB	**05WP-14	NWNW	14	57N	77W	WYW149974
27	Cabin Creek II CB	07CC-14	SWNE	14	57N	77W	WYW144219
28	Cabin Creek II CB	07WP-14	SWNE	14	57N	77W	WYW144219
29	Cabin Creek II CB	11CC-14	NESW	14	57N	77W	WYW149974

	Well Name	Well #	Qtr/Qtr	Sec.	TWP	RNG	Lease #
30	Cabin Creek II CB	11WP-14	NESW	14	57N	77W	WYW149974
31	Cabin Creek II CB	13CC-14	SWSW	14	57N	77W	WYW149974
32	Cabin Creek II CB	13WP-14	SWSW	14	57N	77W	WYW149974
33	Cabin Creek II CB	15CC-14	SWSE	14	57N	77W	WYW149974
34	Cabin Creek II CB	15WP-14	SWSE	14	57N	77W	WYW149974
35	Cabin Creek II CB	01CC-23	NENE	23	57N	77W	WYW144219
36	Cabin Creek II CB	01WP-23	NENE	23	57N	77W	WYW144219
37	Cabin Creek II CB	03CC-23	NENW	23	57N	77W	WYW144219
38	Cabin Creek II CB	03WP-23	NENW	23	57N	77W	WYW144219
39	Cabin Creek II CB	11CC-23	NESW	23	57N	77W	WYW144219
40	Cabin Creek II CB	11WP-23	NESW	23	57N	77W	WYW144219
41	Cabin Creek II CB	03CC-24	NENW	24	57N	77W	WYW144219
42	Cabin Creek II CB	03WP-24	NENW	24	57N	77W	WYW144219
43	Cabin Creek II CB	05CC-24	SWNW	24	57N	77W	WYW144219
44	Cabin Creek II CB	05WP-24	SWNW	24	57N	77W	WYW144219
45	Cabin Creek II CB	*13CC-24	SWSW	24	57N	77W	WYW144219
46	Cabin Creek II CB	*13WP-24	SWSW	24	57N	77W	WYW144219
47	Cabin Creek II CB	01CC-25	NENE	25	57N	77W	WYW144221
48	Cabin Creek II CB	01WP-25	NENE	25	57N	77W	WYW144221
49	Cabin Creek II CB	03CC-25	NENW	25	57N	77W	WYW144221
50	Cabin Creek II CB	03WP-25	NENW	25	57N	77W	WYW144221
51	Cabin Creek II CB	07CC-25	SWNE	25	57N	77W	WYW144221
52	Cabin Creek II CB	07WP-25	SWNE	25	57N	77W	WYW144221
53	Cabin Creek II CB	09CC-25	NESE	25	57N	77W	WYW144221
54	Cabin Creek II CB	09WP-25	NESE	25	57N	77W	WYW144221
55	Cabin Creek II CB	15CC-25	SWSE	25	57N	77W	WYW144221
56	Cabin Creek II CB	15WP-25	SWSE	25	57N	77W	WYW144221
57	Cabin Creek II CB	03CC-26	NENW	26	57N	77W	WYW144221
58	Cabin Creek II CB	03WP-26	NENW	26	57N	77W	WYW144221
59	Cabin Creek II CB	05CC-26	SWNW	26	57N	77W	WYW149974
60	Cabin Creek II CB	05WP-26	SWNW	26	57N	77W	WYW149974
61	Cabin Creek II CB	07CC-26	SWNE	26	57N	77W	WYW144221
62	Cabin Creek II CB	07WP-26	SWNE	26	57N	77W	WYW144221
63	Cabin Creek II CB	09CC-26	NESE	26	57N	77W	WYW144221
64	Cabin Creek II CB	09WP-26	NESE	26	57N	77W	WYW144221
65	Cabin Creek II CB	15CC-26	SWSE	26	57N	77W	WYW144221
66	Cabin Creek II CB	15WP-26	SWSE	26	57N	77W	WYW144221
67	Cabin Creek II CB	01CC-35	NENE	35	57N	77W	WYW149974
68	Cabin Creek II CB	01WP-35	NENE	35	57N	77W	WYW149974

\*Note: These APD's will be held pending the 30 day public posting period ending September 28, 2007.

\*\* Note: This APD will be held pending the 30 day public posting period ending October 11, 2007.

## **I Programmatic mitigation measures identified in the PRB FEIS ROD**

Programmatic mitigation measures are those, determined through analysis, which may be appropriate to apply at the time of APD approval if site specific conditions warrant. These mitigation measures can be applied by BLM, as determined necessary at the site-specific NEPA APD stage, as COAs and will be in addition to stipulations applied at the time of lease issuance and any standard COA.

### **Groundwater**

In order to address the potential impacts from infiltration on shallow ground water, the Wyoming DEQ has developed and revised a guidance document, "Compliance Monitoring and siting Requirements for Unlined Impoundments Containing Coalbed Methane Produced Water" (September, 2006) which can be accessed on their website. For all WYPDES permits the BLM will require that operators comply with the latest DEQ standards and monitoring guidance.

### **Surface Water**

1. Channel Crossings:
  - a) Minimize channel disturbance as much as possible by limiting pipeline and road crossings.
  - b) Avoid running pipelines and access roads within floodplains or parallel to a stream channel.
  - c) Channel crossings by road and pipelines will be constructed perpendicular to flow. Culverts will be installed at appropriate locations for streams and channels crossed by roads as specified in the BLM Manual 9112-Bridges and Major Culverts and Manual 9113-Roads. Streams will be crossed perpendicular to flow, where possible, and all stream crossing structures will be designed to carry the 25-year discharge event or other capacities as directed by the BLM.
  - d) Channel crossings by pipelines will be constructed so that the pipe is buried at least four feet below the channel bottom.
2. Low water crossings will be constructed at original streambed elevation in a manner that will prevent any blockage or restriction of the existing channel. Material removed will be stockpiled for use in reclamation of the crossings.
3. Concerns regarding the quality of the discharged CBNG water on downstream irrigation use may require operators to increase the amount of storage of CBNG water during the irrigation months and allow more surface discharge during the non-irrigation months.
4. The operator will supply a copy of the complete approved SW-4, SW-3, or SW-CBNG permits to BLM as they are issued by WSEO for impoundments.

### **Soils**

1. The Companies, on a case by case basis depending upon water and soil characteristics, will test sediments deposited in impoundments before reclaiming the impoundments. Tests will include the standard suite of cations, ions, and nutrients that will be monitored in surface water testing and any trace metals found in the CBNG discharges at concentrations exceeding detectable limits.

### **Vegetation**

1. Temporarily fence reseeded areas, if not already fenced, for at least two complete growing seasons to insure reclamation success on problematic sites (e.g. close to livestock watering source, erosive soils etc.).

### **Wetland/Riparian**

1. Wetland areas will be disturbed only during dry conditions (that is, during late summer or fall), or when the ground is frozen during the winter.
2. No waste material will be deposited below high water lines in riparian areas, flood plains, or in natural drainage ways.
3. The lower edge of soil or other material stockpiles will be located outside the active floodplain.
4. Disturbed channels will be re-shaped to their approximate original configuration or stable geomorphological configuration and properly stabilized.
5. Reclamation of disturbed wetland/riparian areas will begin immediately after project activities are complete.

### **Wildlife**

1. The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
2. The Companies will construct power lines to minimize the potential for raptor collisions with the lines. Potential modifications include burying the lines, avoiding areas of high avian use (for example, wetlands, prairie dog towns, and grouse leks), and increasing the visibility of the individual conductors.
3. The Companies will locate aboveground power lines, where practical, at least 0.5 mile from any sage grouse breeding or nesting grounds to prevent raptor predation and sage grouse collision with the conductors. Power poles within 0.5 mile of any sage grouse breeding ground will be raptor-proofed to prevent raptors from perching on the poles.

### **Threatened, Endangered, or Sensitive Species**

#### **Bald Eagle**

1. Surveys for active bald eagle nests and winter roost sites will be conducted within suitable habitat by a BLM approved biologist. Surface disturbing activities will not be permitted within one mile of suitable habitat prior to survey completion.
2. A disturbance-free buffer zone of 0.5 mile (i.e., no surface occupancy) will be established year-round for all bald eagle nest sites. A seasonal minimal disturbance buffer zone of one mile will be established for all bald eagle nest sites (February 15 – August 15).
3. A disturbance-free buffer zone of 0.5 mile (i.e., no surface occupancy) will be established year-round for all bald eagle winter roost sites. A seasonal minimal disturbance buffer zone of 1 mile will be established for all bald eagle winter roost sites (November 1 – April 1). These buffer zones and timing may be adjusted based on site-specific information through coordination with, and written approval from, the USFWS.

4. Within ½ mile of bald eagle winter roost sites additional measures such as remote monitoring and restricting maintenance visitation to between 9:00 and 3:00 may be necessary to prevent disturbance (November 1 – April 1).
5. Additional mitigation measures may be necessary if the site-specific project is determined by a BLM biologist to have adverse effects to bald eagles or their habitat.

### **Visual Resources**

1. The Companies will mount lights at compressor stations and other facilities on a pole or building and direct them downward to illuminate key areas within the facility while minimizing the amount of light projected outside the facility.

### **Noise**

1. Noise mufflers will be installed on the exhaust of compressor engines to reduce the exhaust noise.
2. Where noise impacts to existing sensitive receptors are an issue, noise levels will be required to be no greater than 55 decibels measured at a distance of one-quarter mile from the appropriate booster (field) compressor. When background noise exceeds 55dBA, noise levels will be no greater than 5dBA above background. This may require the installation of electrical compressor motors at these locations.

### **Air Quality**

1. During construction, emissions of particulate matter from well pad and resource road construction will be minimized by application of water, or other dust suppressants, with at least 50 percent control efficiency. Roads and well locations constructed on soils susceptible to wind erosion could be appropriately surfaced or otherwise stabilized to reduce the amount of fugitive dust generated by traffic or other activities, and dust inhibitors (surfacing materials, non-saline dust suppressants, and water) could be used as necessary on unpaved collector, local and resource roads that present a fugitive dust problem. The use of chemical dust suppressants on BLM surface will require prior approval from the BLM authorized officer.

## **II Site Specific Conditions of Approval**

1. All changes made at the onsite will be followed. They have all been incorporated into the operator's plan of development. Refer to Table 2.3.1 "Changes agreed to by the operator" on pages 7-10 of EA#WY-070-07-162. See Attachment 1.
2. All Pinnacle Gas Resources representatives and contractors will have a copy of the approved POD map and conditions of approval with them at all times while conducting activities within the Cabin Creek Phase II POD project area.
3. No surface disturbance will be authorized on federal lands prior to the approval of a Pesticide Use Plan (PUP) form WY-04-9222-1 submitted by the operator to the Buffalo Field Office.
4. The operator will follow the guidance provided in the Wyoming Policy on Reclamation (IM WY-90-231) specifically the following:  
Reclamation Standards:
  1. The reclaimed area shall be stable and exhibit none of the following characteristics:

- a. Large rills or gullies.
- b. Perceptible soil movement or head cutting in drainages.
- c. Slope instability on, or adjacent to, the reclaimed area in question.
2. The soil surface must be stable and have adequate surface roughness to reduce runoff and capture rainfall and snow melt. Additional short-term measures, such as the application of mulch, shall be used to reduce surface soil movement.
3. Vegetation canopy cover (on unforested sites), production and species diversity (including shrubs) shall approximate the surrounding undisturbed area. The vegetation shall stabilize the site and support the planned post disturbance land use, provide for natural plant community succession and development, and be capable of renewing itself. This shall be demonstrated by:
  - a. Successful onsite establishment of species included in the planting mixture or other desirable species.
  - b. Evidence of vegetation reproduction, either spreading by rhizomatous species or seed production.
4. The reclaimed landscape shall have characteristics that approximate the visual quality of the adjacent area with regard to location, scale, shape, color and orientation of major landscape features and meet the needs of the planned post disturbance land use.
5. Provide 4" of aggregate where grades exceed 8%. Surfacing material must meet requirements set forth in Wyoming Supplement to BLM Road Manual 9113.
6. The culvert locations will be staked prior to construction. The culvert invert grade and finished road grade will be clearly indicated on the stakes. Culverts will be installed on natural ground, or on a designed flow line of a ditch. The minimum cover over culverts will be 12" or one-half the diameter whichever is greater. Drainage laterals in the form of culverts or waterbars shall be placed according to the following spacing:
 

Grade	Drainage Spacing
2-4%	310 ft
5-8%	260 ft
9-12%	200 ft
12-16%	150 ft
7. Top soil will be segregated for all excavation including the entire disturbance area for constructed pads and excavated areas for rig leveling, reserve pits, constructed roads, spot upgrades, reservoir upgrades, outfalls and utility trenches. This requirement will be waved for trenches installed with wheel trenchers.
8. All permanent above-ground structures (e.g., production equipment, tanks, etc.) not subject to safety requirements will be painted to blend with the natural color of the landscape. The paint used will be a color which simulates "Standard Environmental Colors." The color selected for the Cabin Creek Phase II POD is Covert Green.
9. If produced water is to be applied to road surfaces as dust abatement, the operator needs an approved Wyoming Oil & Gas Commission Facility Information for Road Application of Waste and Waste Water (Form 20) along with the proposed action describing locations, application rates, etc. Form 20 is available at <http://wogcc.state.wy.us>.
10. The approval of this project does not grant authority to use off lease federal lands. No surface disturbing activity, or use of off-lease federal lands, is allowed on affected leases until right-of-way grants become effective on the date in which the right-of-way grant is

signed by the authorized officer of the BLM. Approval of ROW's is required prior to POD development at the following locations:

- NW section 30, T57/R76
  - SW section 30, T57/R76
  - NW section 31, T57/R76
11. All rig slots approved with the POD will be reclaimed back to approximate original contour following well completion. This includes the following locations: 03CC/WP-14-57-77, 03CC/WP-25-57-77 and 07CC/WP-25-57-77.
  12. All roads, well pads, rig slots, culverts, spot upgrades and locations where engineered construction will occur will be completely slope staked for the pre-construction meeting.
  13. The utility corridor disturbance located between the 01CC/WP-23-57-77 and 13CC/WP-13-57-77 wells will not exceed a width of 30 feet.
  14. Disturbance for pipelines and utility corridors adjacent to access roads will be contained within the disturbance allowed for road construction.
  15. Improved roads with utility corridor working width will not exceed 50 feet with clearing and blading not to exceed 35 feet unless specific design is included in the plan and profile section of the master surface use plan.
  16. Primitive roads (2-tracks) with utility corridor working width will not exceed 30 feet with clearing and blading not to exceed 20 feet. Construction of primitive roads access/utility corridor within the POD will minimize impact to sagebrush by minimizing road width, mowing and wheel trenching
  17. Pipeline installation and/or corridors without road access working width will not exceed 50 feet with clearing and blading not to exceed 35 feet.
  18. Utility corridors will be expediently reclaimed following construction and maintained in a professional and workmanship manner avoiding tire rutting, settling and erosion.
  19. A minimum 20 foot undisturbed vegetative buffer will be maintained for erosion features along all access roads unless addressed with proper mitigation in the detailed road designs.
  20. Mowing at the well site where a constructed pad is not approved as designed will be minimized to a radius of 75 feet or less from the well stake.
  21. The operator will maintain well drilling, completion and associated construction operations within a 150 foot by 150 foot work area for those locations where a constructed pad is not approved as designed.
  22. All stock water tanks installed on BLM surface will be installed with a rock apron of 4 inch aggregate surrounding the tank and extending a minimum of 8 feet out from the tank.

23. All existing stock tanks shall be retrofitted with a ramp to enable trapped small birds and mammals to escape. See Idaho BLM Technical Bulletin 89-4 entitled Wildlife Watering and Escape Ramps on Livestock Water Developments: Suggestions and Recommendations.
24. Reserve pits containing frozen fluids will not be closed. See “Operations/Maintenance”, COA #10 of the Conditions of Approval document for further clarification.
25. Top soil will be segregated for all excavation including the entire disturbance area for constructed pads and excavated areas for rig slots, reserve pits, constructed roads, spot upgrades, reservoir upgrades, outfalls and utility trenches. Segregation will not be required for trenches installed with wheel trenchers.
26. Reserve pit will be lined at the following locations: 11CC/WP-14-57-77
27. Disturbance areas mentioned below have fragile soils and erosive conditions that shall be stabilized in a manner which eliminates erosion until a self-perpetuating non-weed native plant community has stabilized the site. Stabilization efforts shall be finished within 30 days of the completion of construction activities.
  - Well site(s): 05CC/WP-24-57-77, 03CC/WP-25-57-77, 07CC/WP-25-57-77, 03CC/WP-26-57-77 and 09CC/WP-26-57-77
  - Road / Pipeline segments associated with well(s): 11CC/WP-14-57-77, 03CC/WP-23-57-77, 11CC/WP-23-57-77, 13CC/WP-24-57-77, 01CC/WP-25-57-77, 03CC/WP-25-57-77, 07CC/WP-25-57-77, 15CC/WP-25-57-77, 03CC/WP-26-57-77 and 09CC/WP-26-57-77
  - Pipeline segment(s): 01CC/WP-23-57-77 to 13CC/WP-13-57-77
28. The operator will drill seed on the contour to a depth of 0.5 inch, followed by cultipaction to compact the seedbed, preventing soil and seed losses. To maintain quality and purity, the current years tested, certified seed with a minimum germination rate of 80% and a minimum purity of 90% will be used. On BLM surface or in lieu of a different specific mix desired by the surface owner, use the following:

**Seed Mix**

<b>Shallow Loamy Ecological Site Seed Mix, 15-19" Precipitation Zone</b>		
<b>Species</b>	<b>% in Mix</b>	<b>Lbs PLS*</b>
Western Wheatgrass - <i>Rosana</i>	20	2.4
Idaho fescue – <i>Joseph</i>	30	3.6
Bluebunch wheatgrass – <i>Secar or P-7</i>	30	3.6
Rocky Mountain beeplant (Cleome serrulata)	10	1.2
Lewis - <i>Appar</i> , Blue, or Scarlet flax	5	0.6
White – <i>Antelope</i>	5	0.6

Shallow Loamy Ecological Site Seed Mix, 15-19" Precipitation Zone		
Species	% in Mix	Lbs PLS*
or Purple Prairie Clover - <i>Bismarck</i>		
<b>Total</b>	<b>100%</b>	<b>12 lbs/acre</b>

\*PLS = pure live seed

\*Northern Plains adapted species

\*Double this rate if broadcast seeding

**This is a recommended seed mix based on the native plant species listed in the NRCS Ecological Site descriptions, U.W. College of Ag. and seed market availability.**

**Wildlife:**

1. The contract biologist shall contact the BLM prior to initiating any wildlife surveys.
2. The following conditions will minimize impacts to nesting and roosting bald eagles:
  - a. No surface disturbing activity shall occur within one mile of bald eagle habitat (Powder River in Sec. 30 and 31, T57N, R76W) annually from November 1 through April 1, prior to a winter roost survey or from February 1 through August 15, prior to a nesting survey. This affects the following wells and infrastructure:

Township/Range	Section	Wells and Infrastructure
5776	30	17-30CC, WP, 18-30CC, WP, 21-30CC, WP, 25-30CC, WP, road corridors and pipelines, over head powerlines
5777	25	1-25CC, WP, 7-25CC, WP, 9-25CC, WP, 15-25CC, WP road corridors and pipelines

- b. If a roost is identified and construction has not been completed, a year round disturbance-free buffer zone of 0.5 mile will be established for all bald eagle winter roost sites. A seasonal minimum disturbance buffer zone of 1-mile will be established for all bald eagle roost sites (November 1 - April 1). Additional measures such as remote monitoring and restricting maintenance visitation to between 9:00 AM and 3:00 PM may be necessary to prevent disturbance.
    - c. If a nest is identified and construction has not been completed, a disturbance-free buffer zone of 0.5 mile (i.e., no surface occupancy) would be established year round for all bald eagle nests. A seasonal minimum disturbance-free buffer zone of 1-mile will be established for all bald eagle nest sites (February 1 - August 15).
    - d. Additional mitigation measures may be necessary if the site-specific project is determined by a Bureau biologist to have an adverse affect to bald eagles or their habitat.
3. **No surface disturbing activity shall occur within ½ mile of all identified raptor nests from February 1 through July 31, annually, prior to a raptor nest occupancy survey for the current breeding season. This condition will be implemented on an annual basis for the duration of surface disturbing activities.** This timing limitation will affect the following proposed wells and their associated infrastructure:

Township/Range	Section	Affected Wells and Infrastructure
5777	14	7-14 CC,WP; 9-14 CC,WP; 11-14 CC,WP; 13-14 CC, WP; 15-14 CC, WP and all associated road corridors and pipelines
5777	23	1-23 CC, WP; 3-23 CC, WP; and all associated road corridors and pipelines
5777	26	5-26 CC, WP and all associated road corridors and pipelines
5777	35	Road access to the 1-35 CC, WP wells, proposed improved road, 3 phase powerline
5777	36	Proposed improved road, 3 phase powerline
5776	30	Proposed improved road, 3-phase powerline

- a. Surveys to document nest occupancy shall be conducted by a biologist following BLM protocol, between April 15 and June 30. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbance activities. Surveys outside this window may not depict nesting activity. If a survey identifies active raptor nests, a ½ mile timing buffer will be implemented. The timing buffer restricts surface disturbing activities within ½ mile of occupied raptor nests from February 1 to July 31.
- b. Nest productivity checks shall be completed for the first five years following project completion. The productivity checks shall be conducted no earlier than June 1 or later than June 30 and any evidence of nesting success or production shall be recorded. Survey results will be submitted to a Buffalo BLM biologist in writing no later than July 31 of each survey year. Nests to be checked are within a ½ mile or less of the proposed development.
- c. If an undocumented raptor nest is located during project construction or operation, the Buffalo Field Office (307-684-1100) shall be notified within 24 hours.

4. The following conditions will reduce impacts to sage grouse:

- a. No surface disturbing activities are permitted within 2 miles of the following lek: Remington; between March 1 and June 15, prior to completion of a greater sage-grouse lek survey. **This condition will be implemented on an annual basis for the duration of surface disturbing activities.** This timing limitation will affect the following wells and infrastructure:

Township/Range	Section	Affected Wells and Infrastructure
5777	12	13-12 CC,WP, road corridor and pipelines
5777	13	1-13 CC,WP, 3-13 CC,WP, 7-13 CC,WP, 9-13 CC,WP, 11-13 CC,WP, 13-13 CC,WP, 15-13 CC,WP road corridors and pipelines, over head powerlines
5777	14	1-14 CC,WP, 7-14 CC,WP, 9-14 CC,WP, 11-14 CC,WP, 15-14 CC,WP road corridors and pipelines, over head powerlines
5777	23	1-23 CC,WP, 3-23 CC,WP, 11-23 CC,WP, road corridors and pipelines
5777	24	3-24 CC,WP, 5-24 CC,WP, 13-24 CC,WP; road corridors and pipelines, over head powerlines
5777	25	1-25 CC,WP, 3-25 CC,WP, 7-25 CC,WP, 9-25 CC,WP, 15-25 CC,WP; road corridors and pipelines,
5776	30	17-30 CC,WP, 18-30 CC,WP, 21-30 CC,WP, 25-30 CC,WP, road corridors and pipelines, over head powerlines

- b. If an active sage grouse lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbance activities will not be permitted until after the nesting season. If surveys indicate that the identified lek is inactive during the current breeding season, surface disturbance activities may be permitted within the 2 mile buffer until the following breeding season (March 1). The required sage grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
  - c. Creation of raptor hunting perches will be avoided within 0.5 mile of documented sage grouse and sharp-tailed grouse lek sites. Perch inhibitors will be installed to deter avian predators from preying on sage grouse.
5. Sharp-tailed grouse surveys are required during the life of the project. If a new sharp-tailed grouse lek is identified during the survey, the 0.67 mile timing restriction (March 1 to June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season. If surveys indicate that the identified lek is inactive during the current breeding season, surface disturbing activities may be permitted within the buffer until the following breeding season. The required survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
6. All pits associated with water treatment facilities containing more than 17,000 mg/L of sodium concentration will be netted to prevent access by migratory birds.

**Archeological Monitoring:**

1. All earth moving activity in the following areas will be monitored by an archeologist who meets or exceed the qualification standards recommended by the Secretary of the Interior. The Bureau has identified these areas as containing the potential for buried cultural deposits. The Bureau will require the submission of two copies of a monitoring report within 30 days of the completion of work.
2. All earth moving activities in alluvial deposits within site 48SH178, T57N R76W Section 30 and T57N R77W Section 25. Specifically, the trenching locations between the Powder River and the 9-25 and 25-30 wells.

Please contact Jim Verplancke, Natural Resource Specialist, @ (307) 684-1057, Bureau of Land Management, Buffalo, if there are any questions concerning these surface use COAs.

**III Standard Conditions of Approval**

**A. General**

1. If any cultural values [sites, artifacts, human remains (Appendix L FEIS)] are observed during operation of this lease/permit/right-of-way, they will be left intact and the Buffalo Field Manager notified. The authorized officer will conduct an evaluation of the cultural values to establish appropriate mitigation, salvage or treatment. The operator is responsible for informing all persons in the area who are associated with this project that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or

archaeological materials are uncovered during construction, the operator is to immediately stop work that might further disturb such materials, and contact the authorized BLM officer (AO). Within five working days the AO will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places;
  - the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary); and,
  - a time-frame for the AO to complete an expedited review under 36 CFR 800.11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction measures.
2. If paleontological resources, either large or conspicuous, and/or a significant scientific value are discovered during construction, the find will be reported to the Authorized Officer immediately. Construction will be suspended within 250 feet of said find. An evaluation of the paleontological discovery will be made by a BLM approved professional paleontologist within five (5) working days, weather permitting, to determine the appropriate action(s) to prevent the potential loss of any significant paleontological values. Operations within 250 feet of such a discovery will not be resumed until written authorization to proceed is issued by the Authorized Officer. The applicant will bear the cost of any required paleontological appraisals, surface collection of fossils, or salvage of any large conspicuous fossils of significant scientific interest discovered during the operation.
  3. The operator shall restrict travel on unimproved two-track roads during periods of inclement weather or spring thaw when the possibility exists for excessive surface resource damage (e.g., rutting in excess of 4-inches, travel outside two-track roadway, etc.).
  4. The first producing well drilled to each targeted coal zone will be designated as the POD "Reference Well". Reference wells will not be required for PODs within a 6 mile radius of the first reference well designated by the operator, nor for co-mingled coal zones. The designated reference well must be equipped to be sampled at the well head. A reference well sample will be collected from the wellhead and submitted for analysis; using the list of analytes identified in WDEQ WYPDES Application for Permit to Surface Discharge Produced Water from CBM New Discharges, Renewals, or Major Modifications, within 30 to 60 days of initial water production. Results of the analysis will be submitted to the BFO-BLM authorized Officer as they become available.
  5. By November 1 each year, companies will provide georeferenced spatial data depicting as-built locations of all facilities, wells, roads, pipelines, power lines, reservoirs, discharge points, and other related facilities to the BLM for all PODs where construction and development have been completed.
  6. If any dead or injured threatened, endangered, proposed, or candidate species is located during construction or operation, the U.S. Fish and Wildlife Service's Wyoming Field Office (307-772-2374), their law enforcement office (307-261-6365), and the BLM Buffalo Field Office (307-684-1100) shall be notified within 24 hours. If any dead or injured sensitive species is located during construction or

operation, the BLM Buffalo Field Office (307-684-1100) shall be notified within 24 hours.

7. Wildlife species are dynamic and new individuals may have moved into the Cabin Creek Phase II POD area after the initial wildlife surveys were completed. The Record of Decision for the PRB FEIS includes a programmatic mitigation measure that states, "The companies will conduct clearance surveys for threatened and endangered or other special-concern species at the optimum time". The measure requires companies to coordinate with the BLM before November 1 annually to review the potential for disturbance and to agree on inventory parameters. Should this project not be completed by January 15, and surface disturbance is planned for that year, a Pinnacle Gas Resources Inc. company representative will coordinate with the BLM to discuss required surveys.
8. All other conservation measures and terms and conditions identified in the Powder River Basin Oil and Gas Project Biological Opinion (WY07F0075) shall be complied with.
9. If an undocumented raptor nest is located during project construction or operation, the Buffalo Field Office (307-684-1100) shall be notified within 24 hours.
10. All contractors will have a copy of the pod map and conditions of approval with them at all times.

## **B. Construction**

1. A pre-construction field meeting shall be conducted prior to beginning any dirt work approved under this POD. The operator shall contact the BLM Authorized Officer Jim Verplancke, NRS @ 307-684-1057 at least 4-days prior to beginning operations so that the meeting can be scheduled. The operator is responsible for having all contractors present (dirt contractors, drilling contractor, pipeline contractor, project oversight personnel, etc.) including the overall field operations superintendent, and for providing all contractors copies of the approved POD, project map and BLM Conditions of Approval pertinent to the work that each will be doing.
2. The operator will limit vegetation removal and the degree of surface disturbance wherever possible. Where surface disturbance cannot be avoided, all practicable measures will be utilized to minimize erosion and stabilize disturbed soils.
3. Construction and drilling activity will not be conducted using frozen or saturated soil material during periods when watershed damage or excessive rutting is likely to occur.
4. Remove all available topsoil (depths vary from 4 inches on ridges to 12+ inches in bottoms) from constructed well locations including areas of cut and fill, and stockpile at the site. Topsoil will also be salvaged for use in reclamation on all other areas of surface disturbance (roads, pipelines, etc.). Clearly segregate topsoil from excess spoil material. Any topsoil stockpiled for one year or longer will be signed and stabilized with annual ryegrass or other suitable cover crop.
5. The operator will not push soil material and overburden over side slopes or into drainages. All soil material disturbed will be placed in an area where it can be retrieved without creating additional undue surface disturbance and where it does not impede watershed and drainage flows.

6. Construct the backslope no steeper than 1½:1, and construct the foreslope no steeper than 2:1, unless otherwise directed by the BLM Authorized Officer.
7. Maintain a minimum 20-foot undisturbed vegetative border between toe-of-fill of pad and/or pit areas and the edge of adjacent drainages, unless otherwise directed by the BLM Authorized Officer.
8. With the overall objective of minimizing surface disturbance and retaining land stability and productivity, the operator shall utilize equipment that is appropriate to the scope and scale of work being done for roads and well pads (utilize equipment no larger than needed for the job).
9. To minimize electrocution potential to raptors, all overhead electrical power lines will be constructed to Avian Power Line Interaction Committee (1996) standards and additional standards identified in the PRB FEIS Biological Opinion (Volume 3, Appendix K, page 43).
10. The operator shall utilize wheel trenchers or ditchers to construct all pipeline trenches, except where extreme topography or other environmental factors preclude their use.
11. Reserve pits will be adequately fenced during and after drilling operations until pit is reclaimed so as to effectively keep out wildlife and livestock. Adequate fencing, in lieu of more stringent requirements by the surface owner, is defined as follows:
  - Construction materials will consist of steel or wood posts. Three or four strand wire (smooth or barbed) fence or hog panel (16-foot length by 50-inch height) or plastic snow fence must be used with connectors such as fence staples, quick-connect clips, hog rings, hose clamps, twisted wire, etc. Electric fences will not be allowed.
  - Construction standards: Posts shall be firmly set in ground. If wire is used, it must be taut and evenly spaced, from ground level to top wire, to effectively keep out animals. Hog panels must be tied securely into posts and one another using fence staples, clamps, etc. Plastic snow fencing must be taut and sturdy. Fence must be at least 2-feet from edge of pit. 3 sides fenced before beginning drilling, the fourth side fenced immediately upon completion of drilling and prior to rig release. Fence must be left up and maintained in adequate condition until pit is closed.
12. The reserve pit will be oriented to prevent collection of surface runoff. After the drilling rig is removed, the operator may need to construct a trench on the uphill side of the reserve pit to divert surface drainage around it. If constructed, the trench will be left intact until the pit is closed.
13. The reserve pit will be lined with an impermeable liner if permeable subsurface material is encountered. An impermeable liner is any liner having a permeability less than  $10^{-7}$  cm/sec. The liner will be installed so that it will not leak and will be chemically compatible with all substances that may be put in the pit. Liners made of any man-made synthetic material will be of sufficient strength and thickness to withstand normal installation and pit use. In gravelly or rocky soils, a suitable bedding material such as sand will be used prior to installing the liner.
14. The reserve pit will be constructed so that at least half of its total volume is in solid cut material (below natural ground level).
15. Culverts will be placed on channel bottoms on firm, uniform beds, which have been

shaped to accept them, and aligned parallel to the channel to minimize erosion. Backfill will be thoroughly compacted.

16. All culverts will be appropriately sized in accordance with standards in BLM Manual 9113.
17. Construction and other project-related traffic will be restricted to approved routes. Cross-country vehicle travel will not be allowed.
18. Maximum design speed on all operator-constructed and maintained roads will not exceed 25 miles per hour.
19. Pipeline construction shall not block nor change the natural course of any drainage. Pipelines shall cross perpendicular to drainages. Pipelines shall not be run parallel in drainage bottoms. Suspended pipelines shall provide adequate clearance for maximum runoff.
20. Pipeline trenches shall be compacted during backfilling. Pipeline trenches shall be routinely inspected and maintained to ensure proper settling, stabilization and reclamation.
21. During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants with at least 50 percent control efficiency. Dust inhibitors (surfacing materials, non-saline dust suppressants, and water) will be used as necessary on unpaved roads that present a fugitive dust problem. The use of chemical dust suppressants on public surface will require prior approval from the BLM Authorized Officer.
22. Operators are required to obtain a National Pollution Discharge Elimination System (NPDES) Storm Water Permit from the Wyoming DEQ for any projects that disturb five or more acres (changing to one acre in March 2005). This general construction storm water permit must be obtained from WDEQ prior to any surface disturbing activities and can be obtained by following directions on the WDEQ website at <http://deq.state.wy.us>. Further information can be obtained by contacting Barb Sahl at (307) 777-7570.
23. The operator shall submit a Sundry Notice (Form 3160-5) to BLM for approval prior to construction of any new surface disturbing activities that are not specifically addressed in the approved APD or POD Surface Use Plan.
24. Weed educational material will be reviewed with operators during pre-construction on-site meetings with operators, subcontractors, and landowners and will also be attached to approved APDs and PODs.
25. Companies will contact the counties to pursue development of maintenance agreements to ensure county roads are adequately maintained for the projected increase in use.

### **C. Operations/Maintenance**

1. The operator shall complete coal bed natural gas wells (case, cement and under ream) as soon as possible, but no later than 30 days after drilling operations, unless an extension is given by the BLM Authorized Officer.
2. If in the process of air drilling the wells there is a need to utilize mud, all circulating fluids will be contained either in an approved pit or in an aboveground containment

tank. The pit or containment tank will be large enough to safely contain the capacity of all expected fluids without danger of overflow. Fluid and cuttings will not be squeezed out of the pit, and the pit will be reclaimed in an expedient manner.

3. Confine all equipment and vehicles to the access road(s), pad(s), and area(s) specified in the approved APD or POD.
4. All waste, other than human waste and drilling fluids, will be contained in a portable trash cage. This waste will be transported to a State approved waste disposal site immediately upon completion of drilling operations. No trash or empty barrels will be placed in the reserve pit or buried on location. All state and local laws and regulations pertaining to disposal of human and solid waste will be complied with.
5. Rat and mouse holes shall be filled and compacted from the bottom to the top immediately upon release of the drilling rig from the location.
6. The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.) Use of pesticides shall comply with the applicable Federal and State laws. Pesticides shall be used only in accordance with their registered uses and within limitations imposed by the Secretary of Interior. Prior to the use of pesticides on public land, the holder shall obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary by the authorized officer to such use.
7. Sewage shall be placed in a self-contained, chemically treated porta-potty on location.
8. The operator and their contractors shall ensure that all use, production, storage, transport and disposal of hazardous and extremely hazardous materials associated with the drilling, completion and production of these wells will be in accordance with all applicable existing or hereafter promulgated federal, state and local government rules, regulations and guidelines. All project-related activities involving hazardous materials will be conducted in a manner to minimize potential environmental impacts. In accordance with OSHA requirements, a file will be maintained onsite containing current Material Safety Data Sheets (MSDS) for all chemicals, compounds and/or substances which are used in the course of construction, drilling, completion and production operations.
9. Produced fluids shall be put in test tanks on location during completion work. Produced water will be put in the reserve pit during completion work per Onshore Order #7.
10. The only fluids/waste materials which are authorized to go into the reserve pit are RCRA exempt exploration and production wastes. These include:
  - drilling muds & cuttings
  - rigwash
  - excess cement and certain completion & stimulation fluids defined by EPA as exemptIt does not include drilling rig waste, such as:
  - spent hydraulic fluids

- used engine oil
- used oil filter
- empty cement, drilling mud, or other product sacks
- empty paint, pipe dope, chemical or other product containers
- excess chemicals or chemical rinsate

Any evidence of non-exempt wastes being put into the reserve pit may result in the BLM Authorized Officer requiring specific testing and closure requirements.

11. Reserve pits will be closed as soon as possible, but no later than 90 days from time of drilling/well completion, unless the BLM Authorized Officer gives an extension. Squeezing of pit fluids and cuttings is prohibited. Pits must be dry of fluids or they must be removed via vac-truck or other environmentally acceptable method prior to backfilling, re-contouring and replacement of topsoil. Mud and cuttings left in pit must be buried at least 3-feet below re-contoured grade. The operator will be responsible for re-contouring any subsidence areas that develop from closing a pit before it is sufficiently dry.
12. Operators are advised that prior to installation of any oil and gas well production equipment which has the potential to emit air contaminants, the owner or operator of the equipment must notify the Wyoming Department of Environmental Quality, Air Quality Division (phone 307-777-7391) to determine permit requirements. Examples of pertinent well production equipment include fuel-fired equipment (e.g., diesel generators), separators, storage tanks, engines and dehydrators.
13. If this well is drilled during the fire season (June-October), the operator shall institute all necessary precautions to ensure that fire hazard is minimized, including but not limited to mowing vegetation on the access route(s) and well location(s), keeping fire fighting equipment readily available when drilling, etc.

#### **D. Dry Hole/Reclamation**

1. All disturbed lands associated with this project, including the pipelines, access roads, water management facilities, etc will be expediently reclaimed and reseeded in accordance with the surface use plan and any pertinent site-specific COAs.
2. Disturbed lands will be re-contoured back to conform with existing undisturbed topography. No depressions will be left that trap water or form ponds.
3. The fluids and mud must be dry in the reserve pit before re-contouring pit area. The operator will be responsible for re-contouring of any subsidence areas that develop from closing a pit before it is completely dry. The plastic pit liner (if any) will be cut off below grade and properly disposed of at a state authorized landfill before beginning to re-contour the site.
4. Before the location has been reshaped and prior to redistributing the topsoil, the operator will rip or scarify the drilling platform and access road on the contour, to a depth of at least 12 inches. The rippers are to be no farther than 24 inches apart.
5. Distribute the topsoil evenly over the entire location and other disturbed areas. Prepare the seedbed by disking to a depth of 4-to-6 inches following the contour.
6. Phased reclamation plans will be submitted to BLM for approval prior to individual POD facility abandonment via a Notice of Intent (NOI) Sundry Notice. Individual

facilities, such as well locations, pipelines, discharge points, impoundments, etc. need to be addressed in these plans as they are no longer needed. Individual items that will need to be addressed in reclamation plans include:

- Pit closure (Close ASAP after suitably dry, but no later than 90 days from time of drilling unless an extension is given by BLM Authorized Officer.) BLM may require closure prior to 90 days in some cases due to land use or environmental concerns.
  - Configuration of reshaped topography, drainage systems, and other surface manipulations
  - Waste disposal
  - Revegetation methods, including specific seed mix (pounds pure live seed/acre) and soil treatments (seedbed preparation, fertilization, mulching, etc.). On private surface, the landowner should be consulted for the specific seed mix.
  - Other practices that will be used to reclaim and stabilize all disturbed areas, such as water bars, erosion fabric, hydro-mulching, etc.
  - An estimate of the timetables for beginning and completing various reclamation operations relative to weather and local land uses.
  - Methods and measures that will be used to control noxious weeds, addressing both ingress and egress to the individual well or POD.
  - Decommissioning/removal of all surface facilities
  - Closure and reclamation of areas utilized or impacted by produced CBM water, including discharge points, reservoirs, off-channel pits, land application areas, livestock/wildlife watering facilities, surface discharge stream channels, etc
7. BLM will not release the performance bond until all disturbed areas associated with the APD/POD have been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
  8. A Notice of Intent to Abandon and a Subsequent Report of Abandonment must be submitted for abandonment approval.
  9. For performance bond release approval, a Final Abandonment Notice (with a surface owner release letter on split-estate) must be submitted prior to a final abandonment evaluation by BLM.
  10. Soil fertility testing and the addition of soil amendments may be required to stabilize some disturbed lands.
  11. Any mulch utilized for reclamation needs to be certified weed free.

12. Waterbars are to be constructed at least one (1) foot deep, on the contour with approximately two (2) feet of drop per 100 feet of waterbar to ensure drainage, and extended into established vegetation. All waterbars are to be constructed with the berm on the downhill side to prevent the soft material from silting in the trench. The initial waterbar should be constructed at the top of the backslope. Subsequent waterbars should follow the following general spacing guidelines:

Slope (percent)	Spacing Interval (feet)
$\leq 2 - 4$	310
5 - 8	260
9 - 12	200

#### **E. Producing Well**

1. Landscape those areas not required for production to the surrounding topography as soon as possible. The fluids and mud must be dry in the reserve pit before re-contouring pit area. The operator will be responsible for re-contouring and reseeding of any subsidence areas that develop from closing a pit before it is completely dry.
2. Reduce the backslope to 2:1 and the foreslope to 3:1, unless otherwise directed by the BLM Authorized Officer. Reduce slopes by pulling fill material up from foreslope into the toe of cut slopes.
3. Production facilities (including dikes) must be placed on the cut portion of the location and a minimum of 15 feet from the toe of the back cut unless otherwise approved by the BLM Authorized Officer.
4. Any spilled or leaked oil, produced water or treatment chemicals must be reported in accordance with NTL-3A and immediately cleaned up in accordance with BLM requirements. This includes clean-up and proper disposition of soils contaminated as a result of such spills/leaks.
5. Distribute stockpiled topsoil evenly over those areas not required for production and reseed as recommended.
6. Upgrade and maintain access roads and drainage control (e.g., culverts, drainage dips, ditching, crowning, surfacing, etc.) as necessary and as directed by the BLM Authorized Officer to prevent soil erosion and accommodate safe, environmentally-sound access.
7. Prior to construction of production facilities not specifically addressed in the APD/POD, the operator shall submit a Sundry Notice to the BLM Authorized Officer for approval.
8. If not already required prior to constructing and drilling the well location, the operator shall immediately upgrade the entire access road to BLM standards (including topsoiling, crowning, ditching, drainage culverts, surfacing, etc.) to ensure safe, environmentally-sound, year-round access. This requirement does not supercede or apply where specific road requirements are addressed in the APD/POD surface use plan (e.g., two track road, spot upgrade, etc.)
9. Waterbars shall be installed on all reclaimed pipeline corridors per the guidelines in D #12.

See Attachment 1

**Attachment 1: Changes as a result of the on-sites**

Well #'s	Comments/changes
17CC/WP-30	The original location is a saddle with erosive soils on both sides to the location and requiring a pad. BLM recommended that the well be moved approximately 400' west to a location with better soils with reclamation potential. The operator agreed to the move and stated that the location would require only minimal rig leveling.
18CC/WP-30	There is excessive fill proposed with the drainage crossing. BLM recommended the operator realigned the access to reduce the cut and fill.
21CC/WP-30	The access road includes 2 low water crossings that are included in the road designs. The operator requested that the downstream low water crossing be modified from the design and replaced by a spot upgrade. BLM agreed with the recommendation that proper crossing drainage and rock reinforcement be integrated into the design.
25CC/WP-30	The operator re-staked the wells 50' NW prior to the onsite to accommodate a larger work space area. The proposed access route was reduced from improved to primitive.
13CC/WP-12	These APD's were not included in Pinnacle's original submittal. Pinnacle requested BLM inspect this location as they like to resubmit it with Cabin Cr. 2. BLM agreed.
01CC/WP-13	The access was reduced to a proposed primitive with surfacing. A metal gate at the fence crossing was added to the plan.
03CC/WP-13	The wells were moved approx. 75' SW to avoid highly erosive and alkaline soils. The access was changed at landowner request to a proposed primitive with a spot upgrade with a low water crossing/culvert combo and was shifted approx. 200 feet east.
07CC/WP-13	The access was reduced to a proposed primitive access.
13CC/WP-13	Wells were moved SE approx. 300 feet off the hill top due to the lack of work space and eliminated a 2nd designed road segment. A pad is needed due to rough ground and. The access at the first designed segment re-routed to the south and through a small saddle to avoid a steep side slope cuts & fills.
01CC/WP-14	The well was moved approximately. 120' west to avoid a pad, and erosive soils at the toe of the hill side. Pinnacle reduced the access to proposed primitive.
05CC/WP-14	This is a poor location with the access and location encroaching into side lopes 25%+. The landowner does not favor the location and suggested a location to the west on the other side of the draw. A new location was agreed to approx. 850 feet NW with the access utilizing an old conventional well access and a template design including a low water crossing.
07CC/WP-14	The wells need to be moved approx. 200 feet west to provide adequate work space. The last 750 feet of the access road will be shifted 100 feet west as well to follow the topography. A stock tank was added at this location.

Well #'s	Comments/changes
11CC/WP-14	The pits at this location need to be lined due to the proximity to the edge of the rim rock. The access route is an old existing conv. well road that has unraveled in places due to steep side and vertical slopes and erosion. BLM recommends that the road be re-designed following the original centerline, minimizing the road wide to 30 feet, adding pullouts at the tops of inclines and adding drainage control structures. Pinnacle agreed.
15CC/WP-14	The wells will be moved approx. 100' south away from the edge of the ridge providing adequate work space.
01CC/WP-23	This location is at the edge of the rim. The access to the well will be from the west only and will not continue east on to the 13CC/WP-13 location as proposed. The utility corridor will follow the staked access route to the east. Pinnacle agreed to a 30' max. disturbance width, extra reclamation efforts and maintenance only by atv.
03CC/WP-23	Add a stock tank to this location. BLM recommended realignment of access road to follow existing contours more closely and avoid excessive cuts and fills. Move intersection of 3-23 and 11-23 approximately 600' northeast.
09CC/WP-23	This is a ridge top with steep slopes on both sides. The sandy soil type and shallow bed rock does not present suitable material to build the pad or access road. > 25% side and vertical slopes exist with highly erosive soil. The surrounding area does not present an alternate route to the location nor is there an alternate location to be found on the plateau. BLM recommended the operator withdraw the APD. The operator agreed to withdraw the APD's.
11CC/WP-23	The wells will be moved approx. 100' north to avoid the edge where the hill drops off. BLM recommended realignment of road to follow existing contours more closely and avoid excessive cuts and fills. Move intersection of 3-23 and 11-23 approximately 600' northeast.
15CC/WP-23	This is a ridge top with steep slopes on both sides. The sandy soil type and shallow bed rock does not present suitable material to build the pad or access road. > 25% side and vertical slopes exist with highly erosive soil. The surrounding area does not present an alternate route to the location nor is there an alternate location to be found on the plateau. BLM recommends the operator withdraw the APD's. The operator agreed to withdraw the APD's.
03CC/WP-24	The wells were moved 75' SE away from the edge of a drainage. The low water crossing needs to be extended and add drainage control where the existing road is. This is the landowner selected this route.
05CC/WP-24	The access descends from a ridge top with steep slopes on both sides. The sandy soil type and shallow bed rock does not present suitable material to build the access road. > 25% side and vertical slopes exist with highly erosive soil. BLM recommends the operator pursue an alternate route to the well off an existing primitive road along the drainage below. The operator staked an alternate well location and designed the access along the recommended route as per the landowners instructions.

Well #'s	Comments/changes
11CC/WP-24	The access route has steep vertical slopes (+35%) and large erosion features as well as bedrock. The sandy soil type and shallow bed rock does not present suitable material to build the pad or access road. > 25% side and vertical slopes exist with highly erosive soil. The surrounding area does not present an alternate route to the location nor is there an alternate location to be found on the plateau. BLM recommends the operator withdraw the APD's. The operator agreed to withdraw the APD's.
01CC/WP-25	The operator re-routed the access to follow an existing primitive road. The revised route requires 2 low water/culvert crossings that the operator requested a spot upgrade for.
09CC/WP-25	The access route was realigned to follow the natural contour; Pinnacle requested the status of the access be reduced to primitive. Pinnacle moved the wells NE approx. 200 feet prior to the onsite to provide a larger work space area and avoid erosive soil.
03CC/WP-25	An alternate access route to the well was staked prior to the onsite avoiding 2 culvert crossings requiring large cut & fills (>30% slopes). The operator requested a 20' X 120' rig slot at this location, BLM agreed. The BLM recommended that the wells be moved approx. 400' east to avoid erosive soil and a large hillside in the upslope with potential to move water onto the location.
07CC/WP-25	The access route to the well was revised prior to the onsite. The new route does not require design as submitted but will be an improved access. The operator requested a 20' X 120' rig slot at this location, BLM agreed with diagram required. BLM requires the excavation for the slot must avoid the toe of slope of the background hill. The operator agreed.
15CC/WP-25	The operator staked an alternate access route that reduces the road status to a primitive road with a low water crossing that will require design and must be staked prior to the pre-construction. The north side of the crossing only provides 45' of working width requiring that the utilities be placed in the roadway. The operator agreed.
01CC/WP-26	This is a ridge top with steep slopes on both sides. The sandy soil type and shallow bed rock does not present suitable material to build the pad or access road. > 25% side and vertical slopes exist with highly erosive soil. The surrounding area does not present an alternate route to the location nor is there an alternate location to be found on the plateau. BLM recommends the operator withdraw the APD's. The operator agreed to withdraw the APD's.
03CC/WP-26	The access was realigned to shift the centerline upslope and away from 4 erosion features along this route. The road construction will include culverts with broken backs to the bottoms of the 4 headcuts reinforced with rock along this route as well as soil stabilization measures. Minimize access width to avoid placing fill in the erosion features and excessive cut & fill. Place utilities in the road way. The operator agreed.

Well #'s	Comments/changes
05CC/WP-26	The landowner requested the access be reduced to primitive road and was realigned to accommodate that. The beginning of the access shifted 200' east. The main utility corridor route into the area is proposed to follow the existing access road. Due to the large size of the steel pipeline, Pinnacle has requested that the corridor be allowed with fewer corners and run cross country in the SWSW of section 26. This is acceptable but requires additional cultural survey and the true route needs to be included on the maps.
07CC/WP-26	Slopes exceed 25% from STA A83+00 to A90+00. Cuts and fills extend onto the steep slopes in several locations. The operator adjusted the alignment and profile to avoid these areas. BLM recommended that the wells be moved approximately 200' South to avoid alkaline soils. Pinnacle agreed.
09CC/WP-26	The access was realigned to avoid steep vertical slope @ the beginning of the designed segment and erosion features along the designed segment. The operator agreed to reduce the beginning of the access road from improved to primitive.
15CC/WP-26	The access was realigned to and the operator agreed to reduce it from improved to primitive.
01CC/WP-35	The operator requested to reduce the proposed road status from improved to primitive with a low water crossing - spot upgrade. BLM agreed.