THE Keystone CENTER

South Park Master Leasing Plan Stakeholder Workshops
October 2014 – February 2015

Final Report, March 2015

This report is a synthesis of stakeholder input for consideration by the BLM for the South Park Master Leasing Plan

South Park Master Leasing Plan Stakeholder Mapping Workshops
October 2014 – February 2015
Final Report, March 2015

EXECUTIVE SUMMARY

This report summarizes outcomes from the South Park Master Leasing Plan Stakeholder Workshops held in October and November of 2014 and February 2015. Section 1 provides a summary of the Workshop process. Section 2 provides an overview of the conservation, recreation and resource extraction stakeholder interests discussed during the workshops. Section 3 details stakeholder proposals and recommendations regarding management within the South Park MLP; Section 3 also summarizes participant rationales for support, opposition, and abstention or uncertainty regarding the proposals. Section 4 discusses concluding themes and next steps.

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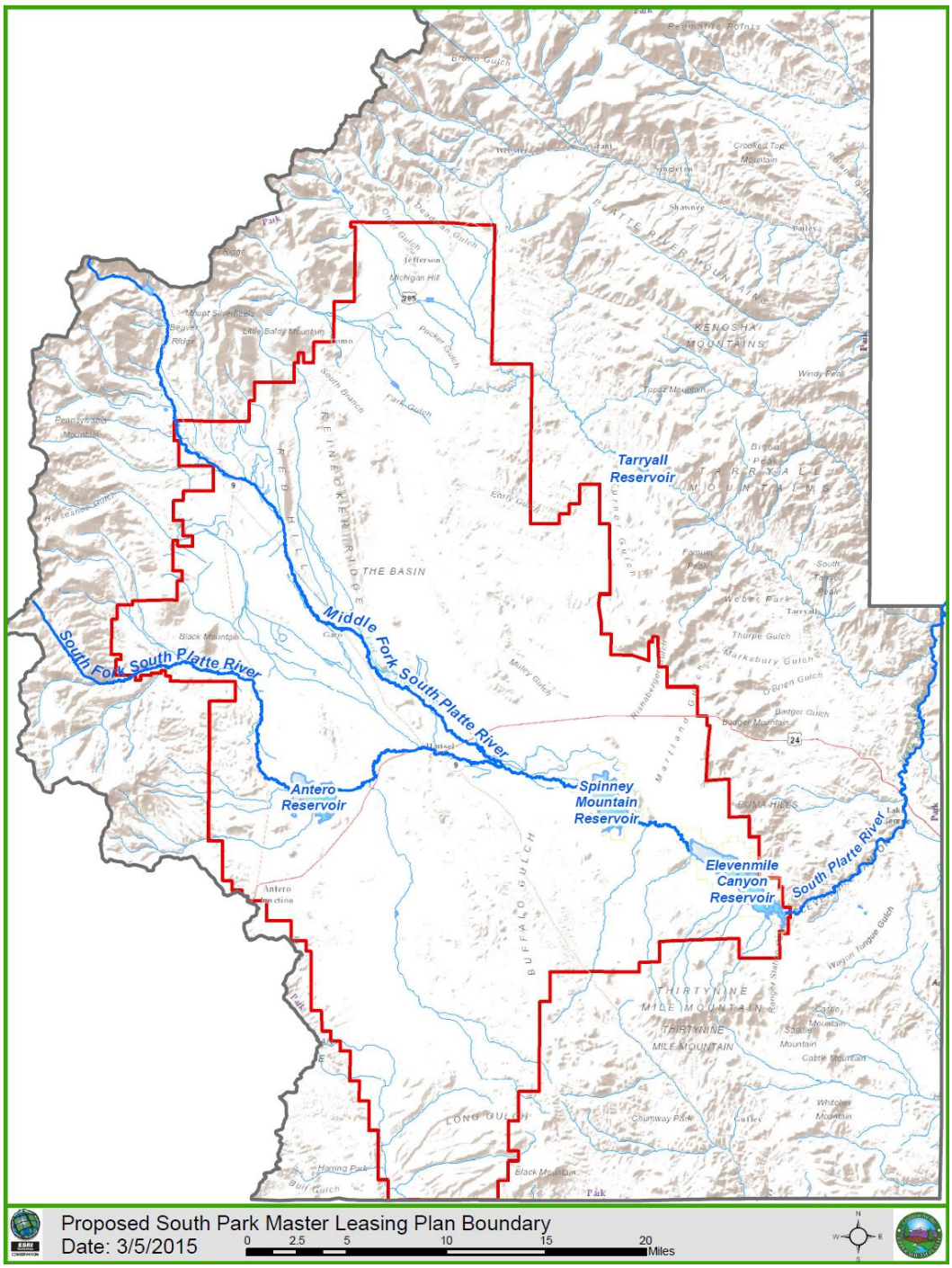
Map of Anticipated South Park Master Leasing Plan (MLP) Area

This map represents the anticipated boundary of the South Park Master Leasing Plan based on preliminary maps provided to the Bureau of Land Management (BLM) in the original MLP application and amended through this stakeholder process. This boundary may change based on final determination of the BLM.



SECTION 1: Workshop Process Summary

BLM Master Leasing Plan Process for South Park: A Master Leasing Plan (MLP) is a written plan that states how oil and gas development will occur in a given area of land managed by the Bureau of Land Management (BLM). It is a guiding document that states what parcels are available for leasing and what areas are not available for leasing, as well as the stipulations and restrictions for those areas that are available for leasing. The MLP makes the same decisions as a Resource Management Plan but at a finer resolution. It has the flexibility to include stipulations, specific reclamation requirements, phased development, Best Management Practices (BMPs) and infrastructure requirements and analyzes impacts from a variety of alternatives.

The MLP that is being developed for the area of South Park, Colorado will establish a guiding framework and vision for future oil and gas leasing and development on federal public lands managed by the BLM in this area. The South Park MLP will nest within the Resource Management Plan for the Royal Gorge Field Office. Key issues are identifying and addressing resource conflicts, objectives for resource conditions and resource protections.

The BLM will conduct a formal process under the National Environmental Policy Act (NEPA) to develop the South Park MLP. That process will begin with the publication of a Notice of Intent (currently anticipated to be released in June 2015) and will include public comment. The BLM is just beginning to embark on its own process to develop the South Park MLP.

Independent Stakeholder Workshops Purpose and Goals: The South Park Master Leasing Plan Stakeholder Workshops were independently convened by Coalition for the Upper South Platte (CUSP) and The Keystone Center (Keystone). The stakeholder effort was neither convened nor requested by the BLM, was not a formal component of BLM's NEPA process, and did not constitute a Federal Advisory Committee under the Federal Advisory Committee Act.

The purpose of the South Park Master Leasing Plan Stakeholder Workshops was to bring together invited stakeholders in discussion of data, facts, perspectives, and management suggestions related to the South Park Master MLP under development by the BLM.

The goals of the South Park Master Leasing Plan Stakeholder Workshops were as follows:

1. Engage the public and stakeholders in a formal and open process to learn about and provide feedback on the South Park Master Leasing Plan
2. Build relationships, trust, and understanding across diverse public and stakeholders
3. Build knowledge of and access to a common set of data and facts upon which Master Leasing Plan decisions would be made
4. To the extent possible, develop and propose to the Bureau of Land Management (BLM) a community-driven set of recommendations regarding the South Park Master Leasing Plan
5. Through discussions related to the South Park Master Leasing Plan, create awareness of stakeholder interests and perspectives that may inform leasing decisions on other lands

The scope of workshop discussions was the South Park MLP and the issues and interests related to oil and gas leasing within the geography of the South Park MLP. Discussions of the South Park MLP may be

informative for separate discussions regarding leasing on other public and private lands. However, this process focused only on lands (including split estates) within BLM jurisdiction.

Workshop Participants: The workshops engaged public and private sector stakeholders including interests related to but not limited to: oil and gas development, wildlife/habitat conservation, water, homeowners, cattlemen and other agriculture interests, land management, and recreation interests. Participation in the workshops was voluntary and by invitation only; The Keystone Center provided independent facilitation and note-taking and the Coalition for the Upper South Platte provided mapping and GIS support. Participation in the workshops does not imply consensus or agreement of all participants on any or all issues. Some invitees participated in an informational capacity, e.g., contributing to discussions but refraining from stakeholder decisions, negotiation or consensus building. Non-participating observers were also allowed at each meeting, and observer attendance included attendance from private citizens, public entities, and other organizations. **For a complete list of participants please see Appendix A.**

Workshop Dates and Objectives: Participants met over the course of three workshops. The dates, locations, and objectives of each workshop are summarized below.

- **October 6, 2014, Alma, CO:** This meeting included presentations that introduced the MLP process, why it is important, the BLM's timeline and decision process for the MLP, and how stakeholders can inform it. Presentations also reviewed the BLM's current leasing management framework for the area (as determined by the Resource Management Plan). Discussion enabled stakeholders to share and discuss their interests and concerns related to leasing in the area, begin to understand where interests align and diverge and how this could impact potential stakeholder recommendations for the MLP, and begin to generate initial ideas regarding potential recommendations. Participants also identified data and data layers that were needed for the group to develop informed recommendations.
- **November 10, 2014, Alma, CO:** Participants discussed initial stakeholder recommendations regarding the South Park Master Leasing Plan. Presentations also reviewed current state and federal standards and stipulations that apply to the South Park area, how they relate to each other, and how BLM considers cumulative impacts of oil and gas leasing.
- **February 24, 2014, Shawnee, CO:** Participants discussed refined stakeholder recommendations regarding the South Park Master Leasing Plan that were prepared in advance of the meeting by smaller groups of stakeholders. Discussion identified rationales in favor of and in opposition to the proposals as well as outstanding questions or concerns.

Workshop Outcomes and Outputs: Throughout the workshop discussions, participants shared information and maps reflecting conservation, resource development, recreation, and other land use interests as well as recommended leasing stipulations within the geography of the South Park MLP. An emphasis was placed on sharing and documenting the range of interests discussed by those participating in the process so that participants—and ultimately the BLM through this report—could better understand the various concerns, interests, and recommendations held by each stakeholder.

The workshops produced refined, multi-stakeholder proposals for protecting resource interests in the South Park Master Leasing Plan area. As a result of workshop discussions, these proposals may be further refined and/or considered by stakeholders and submitted to the BLM through its formal planning process. Because many stakeholders intend to continue to refine and/or consider the various proposals leading up to the BLM's planning process, the workshops did not seek to commit participants

to final votes on proposals. Instead, it emphasized dialogue regarding initial support, opposition, or abstention/uncertainty. This dialogue, as summarized in this report, can help to inform future work in developing stakeholder proposals. **Please see Appendix G for individual Workshop meeting summaries**.

In addition to the summary of interests and recommendations provided in this report, workshop participants also worked with CUSP to develop a set of publicly available map layers, data and resources relevant to the South Park MLP. Prior to the meetings and throughout the stakeholder process, stakeholders provided GIS-based map layers representing their various interests within the MLP; these layers were synthesized by a GIS technician into a single map platform. Participants also provided relevant documents and links with information about the area and their interests. Please utilize the link below to access the online map and supporting documentation:

http://cusp.ws/south-park-mlp/

SECTION 2: Overview of Stakeholder Interests within the South Park Master Leasing Plan Area

Throughout the workshop discussions, participants shared information and maps reflecting conservation, resource development, recreation, and other land use interests along with leasing recommendations and stipulations within the geography of the South Park MLP. These perspectives are summarized below by interest area. The summary reflects the range of perspectives shared during the workshops and as such, no statement or perspective below is intended to imply consensus of the participants.

Oil and Gas Perspectives: The oil and gas resources of the South Park area have not been fully explored. Oil and gas industry interests expressed desire for flexibility and the use of the least restrictive stipulations for leasing while protecting the land and resources. They discussed use of the right technologies and best management practices to minimize or eliminate impacts from development.

Cattlemen Perspectives: The cattle interests expressed that cattlemen generally co-exist with oil and gas development. They receive an economic benefit from development as some of them are provided free natural gas and/or an additional income source. There are numerous ranchers in the valley and they have influenced the landscape for generations. Cattlemen support surface water source protection for cattle; banks need to be protected from erosion. While the South Park MLP focuses on oil and gas leasing, there was interest in avoiding unintended consequences of oil and gas leasing restrictions that could lead to restrictions for other uses.

Agency Perspectives: The local, state, and federal agencies that were represented have discrete and diverse mandates and interests. Agency representatives discussed the need to balance the environmental concerns with the economic implications of development and the multiple-use mandate of public lands. All expressed the need for the public to play an important role in commenting on the plan that will guide the future of development in South Park. Communication and discourse across diverse stakeholders was encouraged in discussion of resource interests and impacts. The South Park MLP stakeholder discussions were seen as an opportunity to help inform future MLP processes and set precedents that are defensible and applicable for other contexts. Resources of interests included water

quality and quantity, air quality, wildlife, social and economic impacts, public health, environmental health, and cultural resources, among others. The complexity of the geology and geography of the area was also emphasized and a basin-wide view of cumulative impacts was encouraged.

Environmental, Conservation and Recreational Perspectives: The environmental and conservation organizations that participated in the workshops discussed their interests in protecting public lands, wildlife, fisheries, habitats and migration corridors as well as water and air resources. Gold medal streams, riparian areas, wetlands, rare plant species, sensitive wildlife areas and areas with pristine or wilderness characteristics were all noted as strong conservation interests. Tied to these conservation interests are recreation and economic interests – an estimated $7 million a year in recreation economy (including fishing, hunting, hiking, backcountry uses, etc.) relies on public lands in South Park. Areas of particular interest include the gold medal streams, High Creek Preserve, BLM holdings north of Reinecker Ridge, areas around the 7 state wildlife areas in South Park, and sensitive wildlife areas for migration and breeding. There was discussion of the need for balance between conservation and development and that this can be accomplished through smart planning and the use of BMPs, restrictions, stipulations and setbacks from sensitive areas. Areas closed to leasing were also desired for particularly sensitive areas.

Water Provider Perspectives*:* Water providers discussed the importance of South Park for water users throughout the state due to the presence of major reservoirs and water infrastructure in the region. Water provider interests include protecting the quantity and quality of water supply from the potential impacts of oil and gas development and the potential for spills. Their infrastructure, rights of way, water rights, dams and source waters are also important. Setbacks for surface and groundwater were encouraged, as were the protection of flood plains and surrounding fens and wetlands.

SECTION 3: Stakeholder Proposals and Recommendations Regarding Oil and Gas Development within the South Park Master Leasing Plan Area

The third and final stakeholder workshop culminated with the discussion of stakeholder proposals and recommendations regarding oil and gas leasing in the South Park MLP area. During that workshop, groups of stakeholders presented proposals that they had collaborated on and refined following an initial discussion of draft recommendations at the previous meeting.

The full range of topics initially discussed at the second workshop included recommendations related to air quality, cumulative impacts, noxious weeds, recreation, ground and surface water, wilderness character, wildlife, and work place safety. Initial discussion of these recommendations revealed that some concerns were already addressed by existing regulations at the national, state, and/or county level. Discussion also revealed commonalities across some proposals, and hence the refined, collaborative proposals were further developed for discussion at the final meeting. Some concepts originally presented at the November 10, 2014, meeting were not further discussed at the final meeting but are still of interest to stakeholders. Please see **November 10, 2014, meeting summary in Appendix G** for the full list of initial stakeholder recommendations.

The focus of the refined proposals includes:

- Wilderness-quality lands preservation
- Wildlife protection
- Water protection
- Waste containment and reduction

The proposals are described in brief below and stakeholder level of support and discussion is detailed for each. Additional detail (description, maps, and images) for each proposal is included, as applicable, in appendices. ***Please note: The proposals included in the appendices of this report reflect what was shared and discussed at the February 24, 2015, meeting, and are not necessarily final proposals, nor do they necessarily reflect the final preferences of those that provided the drafts. The draft proposals provided by stakeholders are subject, at the stakeholders' discretion, to further refinement as they prepare submissions directly to BLM.***

All proposals below refer to stipulations for oil and gas leasing in areas managed by BLM (including surface and subsurface rights). Therefore, proposals referring to closures, No Surface Occupancy, et. al., refer *only* to oil and gas leasing and do not refer to other uses (e.g., other mineral development, reservoir development, etc.).

As described earlier, formal votes were not taken as it is anticipated that stakeholders will continue to refine, review and consider proposals throughout the formal BLM planning process. Instead, participants were asked to indicate and discuss their initial level of support. During the final workshop discussion, there was not consensus support in favor of any proposal; in this case, consensus is defined as a proposal that all stakeholders could (unanimously) support. For each proposal, the summary provides the rationales expressed in favor of and in opposition to the proposal, along with the following questions, uncertainties, and/or other reasons for abstention from support or opposition.

While there was not unanimous support for any proposal, there was broad agreement regarding the overall principles of balancing uses and resource interests; there were differences of perspective in how

this is best achieved. Some proposals did have broader support than others, e.g., limited or no abstention and/or objections. The proposals garnering the broadest (although not unanimous) support included those related to No Surface Occupancy buffers for Gold Medal Streams and requirements for use of closed loop systems for waste containment and reduction. There was also broad (but not unanimous) support for some degree of NSO buffers along waterways in the MLP area. However, there was some disagreement on the width of these buffers, whether they would apply to all perennial waterways in the South Park MLP, and whether they would also apply to intermittent and ephemeral streams.

A. Wilderness Characteristics: Proposal to Close Reinecker Ridge to Leasing and Manage the area as Lands with Wilderness Characteristics *(proposal provided by Wild Connections, Great Old Broads for Wilderness, and The Wilderness Society)*

The proposal titled "Lands with Wilderness Characteristics Inventory: Reinecker Ridge" proposed that 4300 acres adjacent to James Mark Jones Wildlife Area be managed as Lands with Wilderness Characteristics (LWC) and that this area should be closed to oil and gas leasing due to its wilderness characteristics. **See Appendix B for the full proposal.**

Rationales for support of the proposal:

Reinecker Ridge needs protection due to its wilderness characteristics. There are no roads in the Reinecker Ridge area and the area provides a natural and important breeding ground for plovers, lynx, mule deer, elk, bobcats, and many other species. There are implications for herd health and big game migration if roads are built, as well as for other species. BLM has also identified cultural sites in this area, and the area is important for recreation and other uses; grazing is allowed in the area. Reinecker Ridge is adjacent to James Mark Jones State Wildlife Area, an area designated by Colorado Parks and Wildlife as a big game wildlife refuge; James Mark Jones is a split estate with subsurface mineral leasing managed by the State Land Board.

BLM frequently closes areas with high conservation values to oil and gas leasing, and is directed to consider such decisions per relevant law and policy. Compared to the full Master Leasing Plan area, this is not a large area to close, and the Master Leasing Plan should include a balance of areas open to and closed from drilling. No Surface Occupancy (NSO) often allows variances and thus closure is more appropriate for this area.

Rationales for opposition to the proposal:

There are other stipulations, such as NSO, that can be used to address wildlife and wilderness concerns. Additionally, timing restrictions could address the big game migration season. Some participants were opposed, in general, to closure and NSO because they believe that the lands should not be off limits. The James Mark Jones State Wildlife Area and areas around Reinecker Ridge are available for leasing; development may occur on this land surrounding Reinecker Ridge and it is therefore hard to justify closing Reinecker Ridge without the opportunity for NSO. Reinecker Ridge is less than 5,000 acres; under BLM standards, 5,000 acres is the typical size threshold for qualification as LWC under BLM standards.

Rationales for abstention or uncertainty of support vs. opposition:

The broader conversation about how this area might be managed needs to be explored before making decisions. Site choice is everything in development; there is a need to select sites wisely to decrease the environmental impact of drilling in this area. For example, it may be more environmentally appropriate and important to select a site next to an existing road than to block off certain acreage. Or, perhaps NSO would be a better approach combined with exploring spacing issues. There is a lack of public information regarding topography and potential for site development for the Reinecker Ridge area. Colorado Parks and Wildlife input would be helpful in order to learn how experts in the field would protect the area. There were also concerns about unintended consequences of closure leading to restrictions for other users (e.g., cattlemen, ranches).

B. Wildlife Proposal including NSO, No Lease, and Enhanced BMP Areas in the South Park MLP *(proposal provided by Colorado Wildlife Federation (CWF), National Wildlife Federation (NWF), Trout Unlimited, & Theodore Roosevelt Conservation Partnership)*

The proposal, presented in map form, recommended five main elements:

- Reinecker Ridge should be closed to leasing (similar to above)
- Certain areas important to wildlife should have a stipulation of No Surface Occupancy
- Certain areas important to wildlife should have a stipulation of enhanced BMPs (specific practices have yet to be determined)
- Gold Medal streams should have a half-mile No Surface Occupancy buffer
- The current proposed boundary of the South Park MLP should be expanded in the southeast portion to include certain areas important to wildlife

See Appendix C for the proposal.

While there was not unanimous support for the proposal, there was broad (nearly unanimous) support specifically for the proposed ½ mile NSO buffer around the Gold Medal streams.

Rationales for support of the proposal:

Proponents of the proposal described it as a pragmatic, practical, and cohesive approach that supports a long-term, landscape level plan rather than a case-by-case plan. There's a need to ensure lands are protected in the public trust and are managed appropriately for the future. Aside from the proposed closure to oil and gas leasing of Reinecker Ridge (for which rationales in support and opposition are provided above), there are no other proposed closures. The proposal does not impact the bulk of the South Park MLP areas, including many private lands that can be developed. The NSO areas proposed in this presentation are small and manageable, and there is a lot of capability for horizontal drilling for these areas.

The Gold Medal Fishing Water's ½ mile buffer was broadly supported (nearly unanimously) by the group. Places like the South Platte have been fished for many years and this area should be retained forever for recreation (e.g., fishing). South Park residents and visitors enjoy fishing; protection of view corridors by Gold Medal Streams is important. It would be damaging to the county's economy, including its recreational income, if there is drilling within the proposed ½ mile buffer zone. Additionally, a considerable amount of Park County's sales tax dollars have gone into the development and sustainability of the Gold Medal Stream area.

Rationales for opposition to the proposal:

It was suggested that enhanced BMPs are the correct way to approach wildlife concerns in order to satisfy industry and environmental needs. While there is likely little interest in drilling directly next to rivers, the NSO proposals may be unnecessarily duplicative of other NSO proposals or restrictions. There was concern regarding unintended consequences of NSO and closure restrictions that could impact many communities. There is a need to balance resources, wildlife, and quality of life. Some argued that each area should be evaluated on a case-by-case basis rather than taking a landscape approach.

Rationales for abstention or uncertainty of support vs. opposition:

Though these proposals seem reasonable, there is a need for more information, specifically around practical implementation. It is difficult to develop BMPs in a strict timeframe and there is a need for more information about enhanced BMPs; without specifics, it is hard to assess support. Additionally, there was a question about the proposed NSO areas; it was suggested that there could be multiple, small (5 acre) sites along a road that are available for drilling and that could better protect the environment than pushing drilling onto other lands. Private land owners may face less environmental stipulations than sites on public lands.

C. Water Proposals regarding NSO setbacks and BMPs

There were two water proposals developed by stakeholders as well as a synthesis of water protection stipulations applied to oil and gas development in other places. The proposals – one provided by two water providers, Colorado Department of Public Health and Environment, and two conservation organizations, and one provided by two water conservancy districts in Park County – are described below. Although consensus was not reached for any one proposal, there was broad support for the overall principle of source water protection.

There was broad (although not unanimous) support for some degree of NSO buffers along waterways in the South Park MLP. However, there was some disagreement on the width of these buffers, whether they would apply to all perennial waterways in the South Park MLP (or only to those a certain distance upstream of reservoirs), and whether they would also apply to intermittent and ephemeral streams. Some participants opposed a less rigorous proposal while others opposed a more rigorous proposal; some were concerned about the feasibility of a more rigorous proposal; most supported both proposals. The second, more rigorous proposal had slightly less opposition although both had some abstention.

The organizational names listed with each proposal reflect those that provided the proposals. Please note, some of the entities that developed the first proposal also supported – and in some cases expressed preference for – the second, more rigorous proposal.

i. Water Proposal #1: Expansion of Colorado 317B Rules for River and Reservoir Setbacks *(proposal provided by Denver Water, CDPHE, Colorado Springs Utilities, Trout Unlimited, Colorado Wildlife Federation)*

This proposal is an expansion of Rule 317b (https://cogcc.state.co.us/Announcements/Rule317B.pdf), the Colorado Oil and Gas Conservation Commission's Public Water System Protection policy. Rule 317b protects drinking water plant intakes, and this proposal applies the stipulations of 317b to waters

upstream of water supply reservoirs. In order to protect public drinking water source areas from potential contamination in the event of an accidental release of pollutants, the proposal called for the following 3 zones of protection, with increasing protections closest to the water body:

- **Internal Buffer:** Requires that oil and gas operations maintain No Surface Occupancy (NSO) at a minimum distance of three hundred and one (301) feet from the ordinary high water mark on classified surface water supply segments /reservoir and critical drinking water infrastructure. These protective measures would be required for a distance of five (5) miles upstream of ~~a~~ public water supply diversions, reservoirs, intakes, and public water system infrastructure.

- **Intermediate Buffer:** Requires that oil and gas operators use Enhanced BMPs as defined by 317b, including berming from 301 to 501 feet, 5 miles upstream of the ordinary high water mark on classified surface water supply segments reservoir and critical drinking water infrastructure.

- **External Buffer:** Requires that oil and gas operators use BMPs from 501 feet to 1/2 mile, 5 miles upstream of the ordinary high water mark on classified surface water supply segments /reservoir and critical drinking water infrastructure. These BMPs include lined pits, downstream notification of accidental releases near public water systems, etc.

The proposal also expressed support for the ½ mile NSO buffer on all Gold Medal Streams. It also allowed for a variance to the setbacks and BMPs; however, it was noted that the bar for the state variance is set very high and a variance has yet to be granted under 317B.

See Appendix D for this proposal.

Rationales for support of the proposal:

The proposal would protect public drinking water source areas from potential contamination in the event of an accidental release of pollutants; it would broaden protections to include areas above reservoirs, which are not currently protected under 317b. Proponents of the proposal cited that because it is an expansion to a vetted and agreed upon state rule, it had a higher chance of being adopted by the BLM and accepted by industry. This proposal will set a minimum baseline of protection and the regulations can increase from there during the Application for a Permit to Drill process.

Rationales for opposition to the proposal:

Those who opposed this proposal said that the 300 foot Internal Buffer Zone was not restrictive enough and should be increased to reflect the 500 foot NSO of the existing Park County regulations. Many of those that opposed this proposal did so in favor of the more restrictive Upper South Platte Water Conservancy District and Center of Colorado Water Conservancy District proposal described below. There was also concern that the variance allowed under 317b would be granted and the source water not be adequately protected. Although variances under the state 317b rule have not yet been granted, this proposal for South Park would not be part of the state's current 317b rule; under this proposal, variances would be governed and granted by the BLM rules, and there was concern that these may be less stringent than the state's rules.

Rationales for abstention or uncertainty of support vs. opposition:

A participant preferred a 300 foot closed for leasing stipulation instead of NSO. Another stated that in most scenarios, development will occur outside of the 500 foot buffer anyways. Another participant was concerned that other mineral rights would be affected; it was clarified that the proposal only applies to oil and gas development.

ii. Water Proposal #2: 500 foot NSO Setbacks for All Water Bodies *(proposal provided by Upper South Platte Water Conservancy District and Center of Colorado Water Conservancy District)*

This proposal would reinforce Park County's current land use regulations that stipulate NSO within 500 feet of any water body without variances. Water bodies are defined as, "A perennial or intermittent river, stream, lake, reservoir, pond, spring or wetland, but does not include irrigation ditches or roadway drainage ditches." The proposal also supported a ½ mile setback on all Gold Medal fisheries.

The proposal also recommended inclusion of other specific sections of Park County's regulations; these regulations stipulate that all oil and gas wells must use:

1. A closed loop system (*see discussion of this specific proposal in section D, below)*
2. Green hydraulic fracturing materials (this needs more definition)
3. Pit liners and removal of all material including the liner
4. Removal of all hazardous materials including drill cuttings

The districts also support water quality monitoring of all aquifers found in groundwater wells and water bodies within a 1 mile radius of any oil and gas operation, including pre-drilling, during drilling and post drilling at intervals of 1 and 5 years plus any time a groundwater well owner or surface water owner has found chemicals associated with oil and gas operations in ground or surface water.

See Appendix E for this proposal.

Rationales for support of the proposal:

Supporters of the proposal stated that since all water flows into the drinking water sources, all water bodies need to be protected. Proponents cited that their respective boards and constituencies directed them to support the County regulations that are currently in place. A participant noted that there is groundwater and surface water interaction and therefore it is necessary to protect more than 5 miles upstream of a reservoir. Supporters also cited an EPA analysis (**see Appendix F**) that showed 500 feet was consistent in a variety of other settings. (*Note that the EPA analysis was not prepared specifically for these workshops; it was shared as a resource rather than as proposal, and thus was not subject to discussion of level of support).* A supporter explained the need for an NSO buffer to protect water quality and to meet water quality standards in all perennial water bodies within the MLP area, in addition to the five-mile distance upstream of reservoirs. This includes protection of water quality for other designated uses, beyond the water supply designated use for the reservoirs and the intake points. These other uses include agriculture, aquatic life, and recreation.

Some who supported this proposal opposed the first proposal because they felt the first proposal was not protective enough. Some who supported – and some who provided – the first, less stringent proposal also supported and/or preferred this second proposal.

Rationales for opposition to the proposal:

There was concern that, due to the lack of opportunity for variance, this proposal did not provide flexibility in choices that relate to the on-the-ground conditions. There was also a concern that if 500 feet NSO were extended to all water bodies, then – due to the density of water bodies in the area – there would be very few places where development could actually occur. There was also a conversation regarding the definition of 'all water bodies' and concern about the definition being too expansive.

Rationales for abstention or uncertainty of support vs. opposition:

There were questions surrounding the language regarding 'all water bodies' and whether that would include intermittent streams; some felt intermittent streams could be drilled near when they were not flowing. A participant noted that s/he would support this proposal if it were clarified that the 500 foot NSO be utilized on all 'live water,' but not the full watershed as this may be too restrictive. A participant noted that 500 foot NSO limits use of good locations to drill from that will not necessarily result in contaminants entering the streams.

D. Waste Containment and Reduction: Recommendation to Require Closed Loop Systems during the Drilling Phase, without waivers *(proposed by Park County)*

This proposal recommended that all drilling on BLM lands within the MLP require closed loop systems. This proposal did not have unanimous support, however it had broad support with one opposition.

Rationales for support of the proposal:

Closed loop systems are a best practice that is commonly implemented. Closed loop systems include pitless drilling, practices to contain and control fluids and solids, and practices to reduce waste. Closed loop systems are 100% above ground and this is often cheaper for industry. Closed loop systems are fully contained, fully matted, fully encased, and include secondary containment to reduce leakage. It is appropriate to use this best practice in the South Park MLP where there has not been drilling before.

Rationales for opposition to the proposal:

Reasons for opposition included that there is no one-size-fits-all solution, and there should not be a blanket requirement without any exception. There may be situations under which exceptions are appropriate; flexibility is important.

Rationales for abstention or uncertainty of support vs. opposition:

There were no abstentions to this proposal.

SECTION 4: Conclusion

The South Park Master Leasing Plan Workshops were successful in achieving goals regarding public and stakeholder engagement, enhanced relationships and understanding, enhanced knowledge and access to a common set of data and facts, development of stakeholder-driven recommendations to the BLM, and creation of awareness of stakeholder interests and perspectives relevant to a broader set of issues.

The workshops resulted in 3 primary outputs that will better enable stakeholders and the public to engage with and contribute to BLM's formal planning process:

1) Multi-stakeholder proposals for the protection of resource interests, which can be further refined for the formal BLM planning process
2) Publicly available, online map layers, data and resources relevant to the South Park MLP
3) This summary report, which synthesizes stakeholder interests and concerns in the South Park MLP area as well as initial stakeholder perspectives on draft proposals for the MLP

At the close of the workshops, participants reflected on the value of the process for its inclusiveness of diverse participants and its impact in enabling understanding of different interests and values, enhancing communication, increasing overall interest in the South Park community, enhancing collaboration and coalition-building, and identifying proposals for the MLP. Although full consensus was not reached on the proposals, the process did identify several proposals with broad support among participants. The process also helped to identify rationales for opposition, support, and uncertainty that can help inform future review and refinement. Further, even where there was disagreement on specific mechanisms and proposals to address various resource interests, there was general support for underlying principles of resource protection.

The completion of the workshops is only the beginning of stakeholder involvement in the South Park Master Leasing Plan effort. It is anticipated that participants will continue to engage with each other and with the BLM through the upcoming South Park Master Leasing Plan process. The stakeholder workshops are expected to help inform this upcoming dialogue and, ultimately, decision-making regarding the South Park Master Leasing Plan.

Appendix A: South Park Master Leasing Plan Workshop Participants

The meetings were convened by Coalition for the Upper South Platte and The Keystone Center. Facilitation and note-taking were provided by Julie Shapiro and Matthew Mulica, The Keystone Center. Mapping support was provided by Jara Johnson and Carrie Adair, Coalition for the Upper South Platte.

Participation in the workshops does not imply consensus nor agreement of all participants on any or all issues. Some invitees participated in an informational capacity, e.g., contributing to discussions but refraining from stakeholder decisions, negotiation or consensus building. Non-participating observers were also allowed at each meeting, and observer attendance included attendance from private citizens, public entities, and other organizations.

South Park Master Leasing Plan - Stakeholder Workshop Participants					
Organization	**First**	**Last**	**October 6, 2014**	**November 10, 2014**	**February 24, 2015**
Invited Attendees					
Aurora Water	Richard	Vidmar			X
Bureau of Land Management	Keith	Berger	X	X	X
Center of Colorado Water Conservancy	Briggs	Cunningham	X	X	X
Colorado Cattlemen's Association	Dave	Harvey	X		X
Colorado Department of Public Health and Environment	John	Duggan	X	X	X
	Kent	Kuster		X	
Colorado Geological Survey	Peter	Barkmann	X	X	X
	Lesley	Sebol		X	
Colorado Oil and Gas Conservation Commission	Greg	Deranleau		X	
Colorado Parks and Wildlife	Tom	Schreiner	X	X	X
	Reid	DeWalt	X	X	X
Colorado Springs Utilities	Kim	Gortz			X
	Eric	Howell	X	X	
Colorado Wildlife Federation	Suzanne	O'Neill	X	X	X
Denver Water	Don	Kennedy	X	X	X
	Shelia	Pelczarski	X	X	

South Park Master Leasing Plan - Stakeholder Workshop Participants					
Organization	**First**	**Last**	**October 6, 2014**	**November 10, 2014**	**February 24, 2015**
Diamond T Services, Bar Star Energy LLC, Bar Star Land LLC	James	Ingalls	X		X
Great Old Broads for Wilderness	Misi	Ballard	X	X	X
National Wildlife Federation	Bill	Dvorak	X	X	
	Meghan	Cornwall			X
Office of U.S. Senator Bennet	Noah	Koerper	X		
Park County	Tom	Eisenman	X		X
	Gary	Nichols		X	
Park County Advisory Board on the Environment	Terry	O'Neill	X	X	X
State Land Board	Pete	Milonas		X	
The Wilderness Society	Juli	Slivka	X	X	X
Trout Unlimited	Aaron	Kindle	X	X	X
Upper South Platte Water Conservancy District	Lynda	James	X		X
U.S. Environmental Protection Agency	Gregory	Oberley	X		
	David	Fronczak			X
	Peter	Ismert			X
U.S. Forest Service	Amy	Titterington		X	X
Western Energy Alliance	Andrew	Glenn			X
	Brian	Meinhart		X	
Wild Connections	John	Sztukowski	X	X	X
Facilitation & GIS Team					
Coalition for the Upper South Platte	Carrie	Adair	X	X	
Coalition for the Upper South Platte	Jara	Johnson	X	X	X
The Keystone Center	Kim	Haller			X
The Keystone Center	Matt	Mulica	X	X	X
The Keystone Center	Julie	Shapiro	X	X	X

Appendix B: Wilderness Characteristics Proposal: Reinecker Ridge No Leasing

Wild Connections
FROM THE MOUNTAINS TO THE PRAIRIES

Lands with Wilderness Characteristics: Reinecker Ridge

Reinecker Ridge, Royal Gorge Field Office *Photo: John Sztukowski*

The intent of this report is to present objective data to illustrate that the area in question qualifies as Lands with Wilderness Characteristics (LWC), in accordance with Bureau of Land Management (BLM) Manuals 6310 and 6320. The information presented in this report meets the minimum standards for review of new information per Manual 6310, and accordingly BLM must review this information and make its findings and documentation of the review process available to the public as soon as practicable.

Lands with Wilderness Characteristics: Reinecker Ridge

BLM Royal Gorge Field Office, Front Range District
BLM Unit Identifier: CO-020-082 (Reinecker Ridge)

Submitted by:

Wild Connections
2168 Pheasant Place, Colorado Springs, CO 80909
info@wildconnections.org; (719) 686 - 5905

Prepared by:

John Sztukowski, Wildlands Inventory Coordinator, Wild Connections
john@wildconnections.org; (817) 939 - 4239

Report Date:

February 2015

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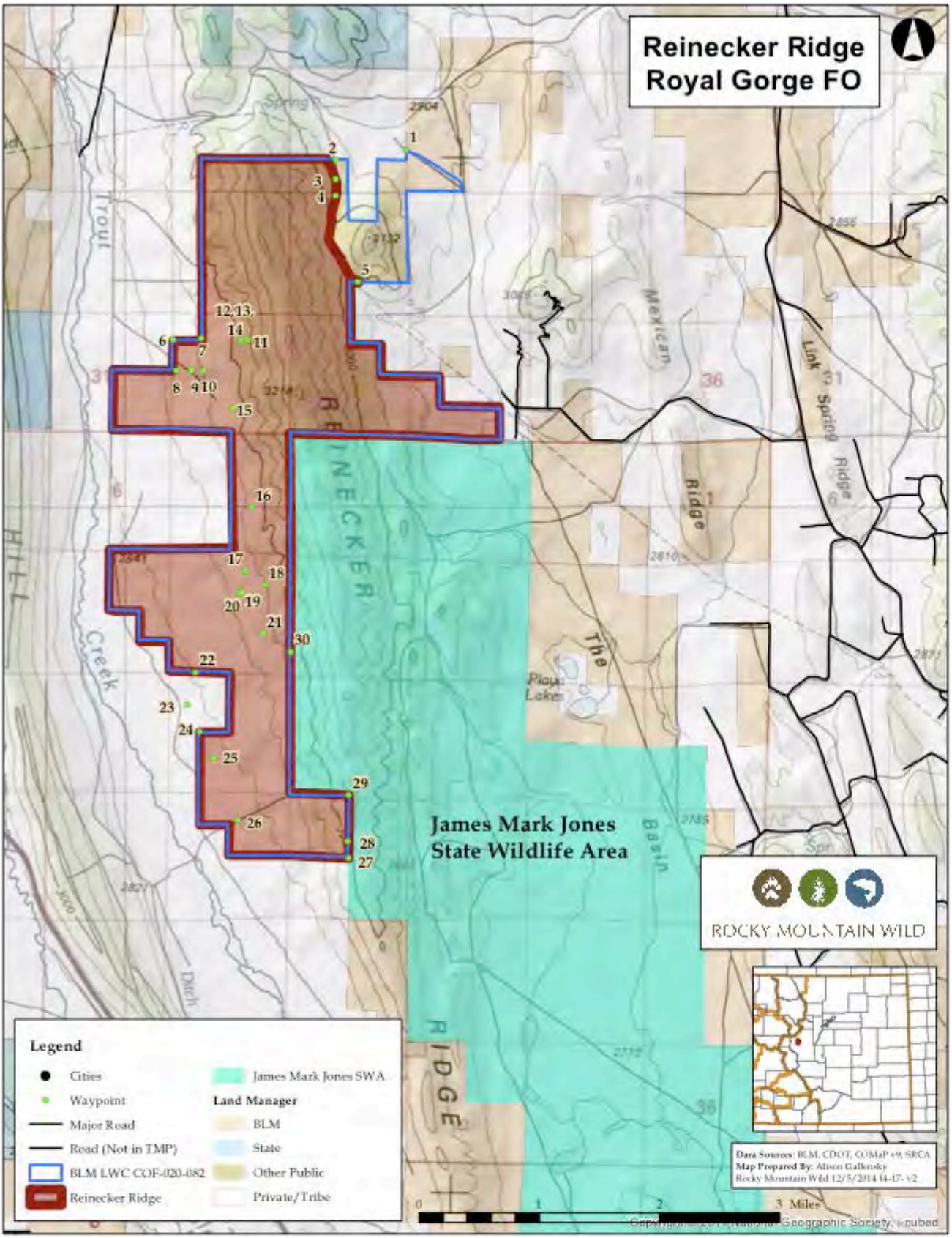


Overview

The Reinecker Ridge proposed Lands with Wilderness Characteristics (LWC) unit consists of approximately 4,300 contiguous acres in central Colorado. This unit is located less than four miles east of Fairplay, CO and contiguous with the James Mark Jones State Wildlife Area (SWA), in northwest Park County. This unit ranges from an elevation of approximately 9,300 feet up to 10,558 feet atop Reinecker Ridge South. The proposed LWC supports a diversity of vegetation and much wildlife, bolstered by ecosystems consisting of high elevation mixed forests and montane grasslands.

The Reinecker Ridge proposed LWC primarily encompasses Reinecker Ridge South, in addition to grasslands and mixed forests that lead up to the ridge from the east and west. The southern portion of Reinecker Ridge South resides in James Mark Jones SWA, a 17,429 acre protected natural area, which borders the unit to the southeast. The remainder of the unit is primarily bordered by private property, limiting public entrance to two roads accessed from the north. The northeast unit is bordered by the Colorado Springs Utility (underground) pipeline, with a public access route available via Reinecker Ridge Road from US 285 to the north. Gap Road, also via US 285, forms a boundary to the northwest of the unit for a short distance.

This unit has extraordinary biological values. It supports a diversity of plant and wildlife habitats, due to its topographic variety and assorted ecosystems. Montane grasslands are abundant in this unit, supporting an array of wildflowers and shrubs. These grasslands lead up to the north-south ridge itself, which boasts groves of mixed forests, consisting of aspen, subalpine fir, ponderosa pine, bristlecone pine, and limber pine. The entirety of the Reinecker Ridge proposed LWC is an area with significant and very high levels of biodiversity, as identified by the Colorado Natural Heritage Program (CNHP), due to unique fen wetland, rare plant communities, rare plants, and the breeding ground for the globally vulnerable Mountain Plover.

Other animal species, with high habitat and range values, can also be found in the Reinecker Ridge proposed LWC, including black bear, elk, mule deer, mountain lion, and the threatened and endangered species Canadian lynx. Deer, pronghorn, and bear were observed and documented within this unit. Local residents have observed additional species in the Reinecker Ridge unit, including moose, bobcat, goshawk, bald eagle, gold eagle, great horned owl, burrowing owls, and migratory snow owls.

Opportunities for solitude and primitive recreation are abundant in the 4,300 acre contiguous roadless area that forms the proposed Reinecker Ridge LWC. The high elevation mixed forests and grasslands provide extensive opportunity for solitude in the forms of isolation, remoteness, lack of visitation and vegetative screening. Primitive recreation abounds in all seasons, including hunting, backpacking, hiking, wildlife viewing, horseback riding, snowshoeing, and photography.

The BLM inventoried this unit (delineated by the blue line in the above map) in 2013, identified as unit COF-020-082 (Reinecker Ridge). The BLM's report claims that this unit does not have wilderness characteristics due to its size of 4,677.8 acres. While the unit is smaller than 5,000 acres, it can still qualify as lands with wilderness characteristics because "the area is of sufficient size as to make practical its preservation and use in an unimpaired condition" (BLM Manual 6310,

p 6) due to the fact that it is contiguous with the 17,429-acre James Mark Jones State Wildlife Area. The SWA borders much of the eastern portion of the unit and actually contains the majority of Reinecker Ridge itself. Since the BLM did not inventory this unit for wilderness characteristics outside of size, the following information, including qualities for naturalness, solitude, recreation, and supplemental values, can be considered new for the Reinecker Ridge proposed LWC.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of Wilderness Inventory Roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p 4). These were the parameters Wild Connections used to decipher the boundaries of the Reinecker Ridge proposed LWC. Only after the true boundaries of the contiguous roadless unit are identified can an objective and thorough assessment of that unit's wilderness characteristics be made.

In the spring of 2013, Wild Connections produced a preliminary boundary delineation for this unit based on the size and contiguity requirements stated in Manual 6310 (p 6). During the following months in the summer of 2013, Wild Connections' mapping teams visited the Reinecker Ridge proposed LWC several times to conduct in-depth, on-the-ground inventories of this unit. Our goal was to assess this area for wilderness characteristics, based on BLM's Manual 6310, and report our findings to the BLM's Royal Gorge Field Office in efforts to identify potential wilderness areas to expand "wildlands" corridors in central Colorado. Additionally we have reviewed the 2013 BLM RGFO inventory and boundaries and have made assessments and adjustments based on our in-depth field inventories.

Wild Connections' report offers new in-depth data and information, including photo, narrative, and geo-referenced data, supporting the Reinecker Ridge proposed LWC. The boundary delineations and narratives describing the wilderness characteristics found within this unit are detailed below. Waypoints (many with photos) are referenced throughout this report; the photos with geo-data, time and date stamp, description, and page number can be found at the end of the report, akin to the one shown below.

Reinecker Ridge (12) - S
View of snowcapped Mosquito Range from NW interior (p. 11)

Discussion of Wilderness Characteristics including Boundary Delineations

I. The Reinecker Ridge proposed LWC meets the minimum size criteria for roadless lands.

The Reinecker Ridge proposed LWC comprises approximately 4,300 contiguous roadless acres, which can be considered of sufficient size for practical management of an LWC area (BLM Manual 6310, p 6), and is contiguous with a greater area, James Mark Jones SWA, which is managed to retain its natural values, backcountry recreation experiences and wildlife habitat. With regard to route determination, this manual states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. A "way" that is used on a continuous and regular basis still does not constitute a road. Additionally, a vehicle route that was constructed by mechanical means, *but is no longer being maintained by mechanical methods* is also *not* a road. By comparison, a Wilderness Inventory Road (WIR) is a vehicle road that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p 11). Wild Connections' inventory of this area assesses routes that are or are not considered WIRs based on the above definitions from Manual 6310.

There are few public access points into the Reinecker Ridge proposed LWC, as much of the unit is bordered by private property. Reinecker Ridge Road accesses the northeast unit via Bar D Road (Waypoint 1), which is accessed from US 285 to the north. Bar D Road serves as the northeast boundary for the BLM's inventory of unit CO-020-082 (Reinecker Ridge). Reinecker Ridge Road

heads a short distance west from Bar D Road and comes to a junction for an unmarked undesignated route at Waypoint 2. A fence line marks the public – private boundary, as viewed in the photopoint.

The route south from Waypoint 2 meets the eastern boundary at Waypoint 3, where it overlays with the Colorado Springs Utility (CSU) pipeline, which serves as the eastern boundary in the northeast unit. The CSU pipeline is not visible on the ground. The route that parallels it shows considerable signs of revegetation as evidenced in Waypoint 4, taken further south along the route. However this route has right-of-way (ROW) access to service the CSU pipeline and will be considered a WIR, serving as the NE boundary along with the pipeline. The route and pipeline continue to Waypoint 5, where they exit the proposed LWC.

Gap Road provides the other public access point into the Reinecker Ridge proposed LWC, also accessed from US 285 to the north. Gap Road meets the unit to the northwest at Waypoint 6, where the road then heads west away from the unit. Waypoint 6 shows a junction where a couple of faint routes head east and south, both of which border the unit. The route to the east ends at a fence at Waypoint 7, where a social route heads south into the interior along a grazing fence, accessed by a barbed wire gate. As indicated in the photopoint, this route is barely discernible, does not appear to be constructed by mechanical means, maintained, nor continuous, and thus will remain in the proposed LWC as a way.

The route south from Waypoint 6 follows the boundary of the unit to Waypoint 8, which views the boundary route north. A social route picks up at Waypoint 8 and heads east into the interior. This route also does not appear to be constructed be mechanical means, nor maintained or continuous, as evidenced in Waypoint 10, and will remain in the unit as a way. The route continues east up Reinecker Ridge to Waypoint 11, where it ends into an open field at what appears may be a hunting outpost.

Back at Waypoint 10, another revegetated route heads south, paralleling Reinecker Ridge South. The condition of this route can be viewed in Waypoint 15 and further south at Waypoint 16, which appears to have not been constructed be mechanical means, nor maintained or continuous. A junction can be seen at Waypoint 17, in which both routes show heavy revegetation. The route that splits off to the east begins to head up the ridge, however ends approximately one-fifth of a mile at Waypoint 18. The route that heads south continues to Waypoint 22, where it exits the unit to the southwest into private property.

Another route picks up in the southwestern portion of the unit at Waypoint 24, marked by a fence and a barbed wire gate with a private property sign. This route loosely follows a ditch, as seen in Waypoint 25, ending at another fence with a barbed wire gate at Waypoint 26 in the southwest corner of the unit.

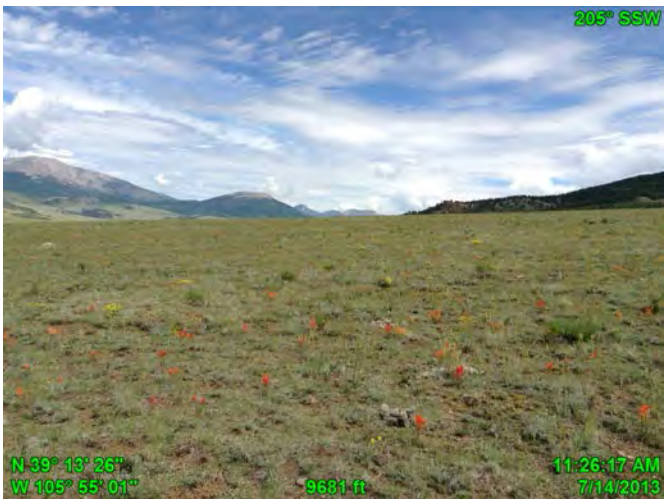
The James Mark Jones SWA borders the unit to the southeast. Waypoint 27 marks the southeastern boundary point of the unit, contiguous with the SWA. The James Mark Jones SWA boundary fence can be viewed in Waypoint 27. Waypoint 29 also marks a boundary corner in the southeast unit contiguous to the SWA, showing the boundary fence with a sign posted for the SWA.

The SWA fence line continues northward as the boundary to the proposed LWC, as exemplified in Waypoint 30, clearly displaying a sign for the state land boundary.

II. The Reinecker Ridge proposed LWC is primarily affected by the forces of nature.

The Reinecker Ridge proposed LWC is primarily affected by the forces of nature, with human impacts considerably unnoticeable within the unit. Motorized public access to the unit is limited to two public access points, with motorized use within the unit quite restricted. Other routes found within the unit showed a lack of motorized use and an overall apparent lack of regular use, with the forces of nature reclaiming many of the former roads. Human impacts that were observed in the proposed LWC were minor and will be detailed at the end of this section.

The proposed LWC offers a mixture of vegetation types, due to the topographic variety and diverse ecosystems found within this unit. Montane grasslands dominate much of the unit that leads up the ridge, east and west. This is exemplified in Waypoint 9, right, taken in the northwest section of the unit, displaying an assortment of wildflowers among the native grasses and brush, which is consistent throughout much of the unit. Mt Silverheels (left) and Little Baldy Mountain (center) can be viewed in the background.



Reinecker Ridge (9) - SSW
Wildflowers among brush and montane grassland in NW unit; View of Mt Silverheels (left) (p. 8)

Among the grasslands are high-elevation mixed forests with groves of aspen, subalpine fir, and ponderosa pine. Bristlecone pine and limber pine mix in as well in the higher elevation areas. Waypoint 19 illustrates the grassland that leads up to the mixed forests, which gives way to montane grassland in sections atop Reinecker Ridge. Waypoint 14 provides a closer look at the high-elevation mixed forests that are located along the ridge.

Wild Connections inventory of the Reinecker Ridge proposed LWC primarily revealed untrammeled naturalness, however there were some minor human impacts noted as well. The minor human impacts found within the unit consisted of former roads, gates, fences, signs, and a ditch, as documented in the previous section. Grazing also appears to be permitted within the proposed LWC. A salt lick was observed at Waypoint 20, in the center of the unit just west of Reinecker Ridge.

While there are a few minor human impacts spread throughout the proposed LWC, these are examples of "human-made features" that are considered substantially unnoticeable and thus do not hinder wilderness characteristics (BLM Manual 6310, p 6). Furthermore what was found and inventoried does not affect the natural integrity or the apparent naturalness of the unit overall (BLM Manual 6310, p 6-7).

III. The Reinecker Ridge proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The Reinecker Ridge proposed LWC offers many opportunities for solitude and primitive and unconfined recreation. Given the topographic variety, the few entry points, dearth of trails (motorized and non-motorized), and observed lack of overall use, there are vast opportunities for solitude. The many groves of mixed forests found throughout the unit provide excellent screening from unnatural sights and sounds. Waypoint 14, referenced in the previous section and taken in the northwest interior of the unit, shows an excellent example of the vegetative screening available for solitude. Furthermore, the lack of visitation to the unit provides outstanding opportunities for respite and remoteness just about anywhere in the proposed LWC.

Consisting of near 4,300 acres of contiguous unroaded wilderness land, the proposed LWC offers a variety of primitive and unconfined recreational opportunities as well. There are outstanding opportunities for hiking, biking, backpacking, camping, hunting, snowshoeing, wildlife viewing, bird watching, horseback riding, and photography. A horseback rider was observed just east of the unit in the James Mark Jones SWA. The James Mark Jones SWA, which offers similar wildlife habitat to the contiguous Reinecker Ridge proposed LWC, details hunting opportunities for deer, elk, pronghorn, and small game.

IV. The Reinecker Ridge proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Wild Connections inventory of the Reinecker Ridge proposed LWC indicates numerous supplemental values that contribute to the overall experience of visiting this area and provide additional evidence that this unit's unique qualities should be recognized and protected. The majority of these values support the area's regional ecological importance and rich biodiversity. The supplemental values presented below are not intended to be exhaustive, rather a summarization of some of the widely known significant values for which basic data was available to complement our on-the-ground inventory.

The Reinecker Ridge proposed LWC has extraordinary biological values and is part of a greater connectivity core. The Colorado Natural Heritage Program (CNHP) found that this area has significant and very high levels of biodiversity. This unit is encompassed within CNHP's biodiversity assessment of a greater South Park mega site, which should be considered as a Potential Conservation Area (PCA) due to: globally rare, unique rich fen wetlands; globally and state rare plants that have adapted to the rich fens, including the globally vulnerable Colorado Tansy-aster (*Machaeranthera coloradoensis*); rare plant communities including the globally imperiled wetland community *Festuca arizonica - Muhlenbergia filiculmis,* the world's largest grassland occurrence at 1.3 million acres; and the globally vulnerable Mountain Plover (*Charadrius montanus*) and its breeding ground. The Mountain Plover, a bird found to have high occurrence in the area, is listed as Colorado Department of Wildlife (CDOW) specie of concern, a

species of most concern by the US Wildlife Conservation and Restoration Program's (WCRP) Comprehensive Wildlife Conservation Strategy (CWCS), Colorado BLM sensitive, and a Partnership in Flight Priority Bird.

High habitat and range values for many wildlife species have been identified in the Reinecker Ridge proposed LWC. Rocky Mountain Wild's (RMW) Assessment of Biological Impact (ABI) documented the following mammals and associated values within the unit: Canadian lynx (*Lynx canadensis*) potential habitat; mountain lion (*Puma concolor*) overall and peripheral range; black bear (*Ursus americanus*) overall range; mule deer (*Odocoileus hemionus*) concentration area, overall range, resident population, summer range, winter range, winter concentration, severe winter range; pronghorn (*Antilocapra americana*) overall range, winter range, and migration patterns; elk (*Cervus Canadensis*) overall range, resident population area, migration patterns, summer range, and winter range; and Gunnison's prairie-dog (*Cynomys gunnisoni*) overall range.

The most notable animal species affiliated with the proposed LWC is the Canadian lynx, which is listed as a threatened species by the US Fish and Wildlife Service (FWS), an endangered species by the CDOW, and a species of most concern by the US Wildlife Conservation and Restoration Program's (WCRP) Comprehensive Wildlife Conservation Strategy (CWCS). Gunnison's prairie-dog is also listed as a species of most concern by WCRP's CWCS, as well as listed as Colorado BLM sensitive.

Many animal species or indications of the species were also observed in the Reinecker Ridge proposed LWC. Deer, elk, and pronghorn tracks and scat were observed throughout the unit. A herd of deer was spotted in the western portion of the unit along Reinecker Ridge at Waypoint 23. A mother black bear and two cubs were also observed in the western portion of the unit along the ridge at Waypoint 21 (right), as they made their way through patches of aspen groves.

Reinecker Ridge (21) - SSW
Black bear with cubs in central interior, W side of Reinecker Ridge (p. 10)

Longtime local residents (Jim and Annie Halpin) have observed many of the above and additional species in the proposed Reinecker Ridge LWC, most markedly the Canadian lynx and moose. Other notable species observed include bobcat, mountain lion, ermine, goshawk, bald eagle, gold eagle, great horned owl, burrowing owl, and migratory snowy owls. Reinecker Ridge is also on the flyway for the frenzied migration of sandhill cranes.

There are exceptional scenic views from within the proposed LWC, given the high elevation of the unit and surrounding landscape. Waypoint 28 views the nearby Mosquito Range from atop Reinecker Ridge, displaying (from right) Mt Silverheels, Little Baldy, and Boreas Mountain, among other mountains. Waypoint 12, taken a couple months earlier, views the Mosquito Range

snowcapped. Other mountains and ranges are visible from atop Reinecker Ridge as well. Waypoint 13 views the Sangre de Cristo Mountains (left) and the Buffalo Peaks of the Mosquito Range (near right), with the Sawatch Range in the background (right).

The 4,300 acre proposed wilderness also noteworthy for its geology. Reinecker Ridge itself is from the Tertiary Age, consisting primarily of sandstone and shale. The lower elevation areas east and west of the ridge, albeit still above 9,000 feet, is from the Cretaceous Age, formed principally of shale rock in this region. The above geological data was obtained from the United States Geological Survey's (USGS) Mineral Resources on-line spatial data, selected for Colorado's geology.

Summary Conclusion

Based on Wild Connections' on-the-ground inventories, the proposed Reinecker Ridge LWC qualifies as Land with Wilderness Characteristics (LWC) in accordance with BLM's Manual 6310. While the unit is less than 5,000 acres, it can still qualify as lands with wilderness characteristics because it is "of sufficient size as to make practical its preservation and use in an unimpaired condition" (BLM Manual 6310 p 6). The size for this unit is sufficient as it not only is just under the minimum threshold, but the preservation and management will be practical with the contiguous 17,429 acre James Mark Jones State Wildlife Area. Given the size of the unit, lack of significant human impacts, disparate topography, diverse ecosystems, and abundant wildlife, the Reinecker Ridge proposed LWC offers outstanding wilderness characteristics - including apparent naturalness and outstanding opportunities for solitude and primitive and unconfined recreation.

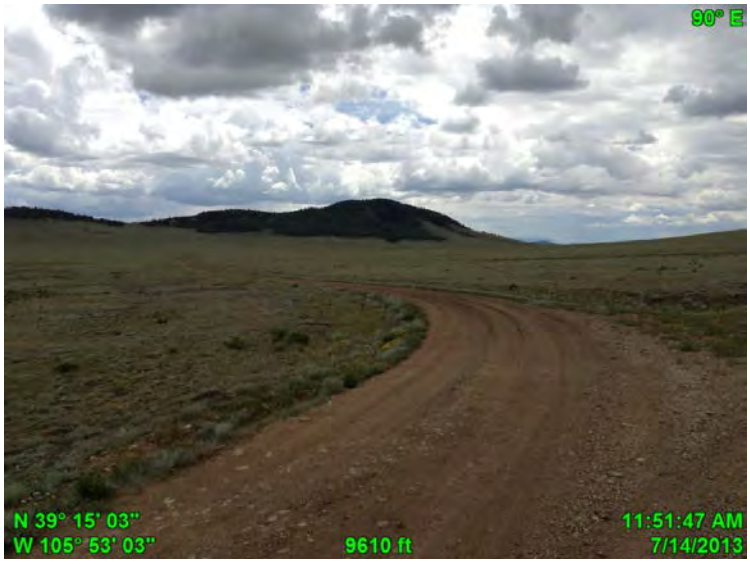
While much of the proposed LWC consists of untrammeled wilderness, human impacts were found. As referenced, former roads, fences, gates, signs, and a ditch were observed within the unit. Signs of grazing were also observed within the proposed LWC. Nevertheless these are minor human impacts, consistent with BLM Manual 6310, as the natural integrity and the apparent naturalness of the proposed LWC in total are not compromised.

Wild Connections' inventory has documented the necessary boundaries as well as the wilderness characteristics within the unit. This overview provides new information, including narrative, photo, and geo data, and supporting maps, documenting that the approximately 4,300 acre Reinecker Ridge proposed LWC meets wilderness criteria. This area possesses Lands with Wilderness Characteristic status and its wilderness values should be protected and preserved. It is imperative that the BLM recognize and protect these values in their lands management decisions, so that these unique and abundant wilderness qualities are sustained.

Reinecker Ridge Proposed LWC Waypoints

The following photographs correspond with the numbered Waypoints on the above Reinecker Ridge map and may be referred to in the report narrative describing the wilderness characteristics. The direction of view (16 point Cardinal) is indicated in the bolded caption. Below this is a short description of the photo, with the referenced page number(s) in parenthesis.

The photos are also watermarked with the direction (degrees and cardinal) in the top right, date and time in the bottom right, elevation in the bottom center, and the latitude and longitude in the bottom left.



Reinecker Ridge (1) - E
Bar D Rd at Reinecker Ridge Rd (p. 6)

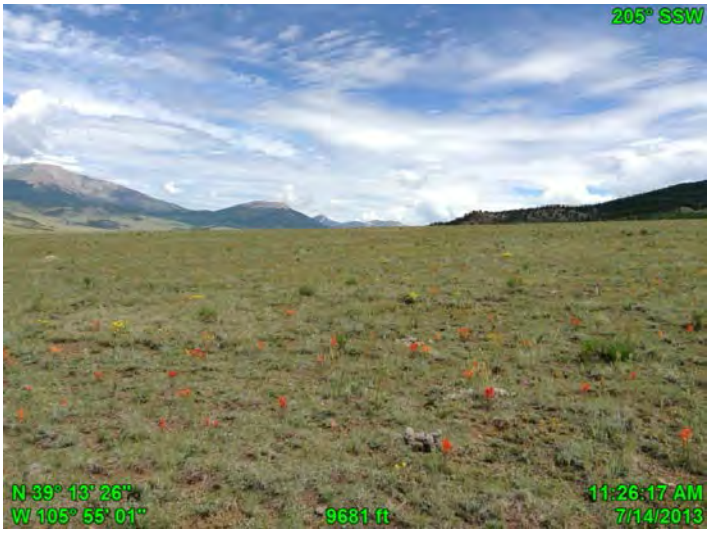
Reinecker Ridge (2) - SSW
Reinecker Ridge Rd at CSU pipeline access route, which becomes NE unit boundary (p. 7)

Reinecker Ridge (4) - S
CSU access route from Reinecker Ridge Rd shows considerable revegetation (p. 7)

Reinecker Ridge (6) - SSE
Boundary point at Gap Rd of NW unit (p 7)

Reinecker Ridge (7) - SSE
End of boundary rd E of Gap Rd; Way heads S into interior unit (p. 7)

Reinecker Ridge (8) - WNW
Boundary route S of Gap Rd; Way heads E into unit (p. 7)



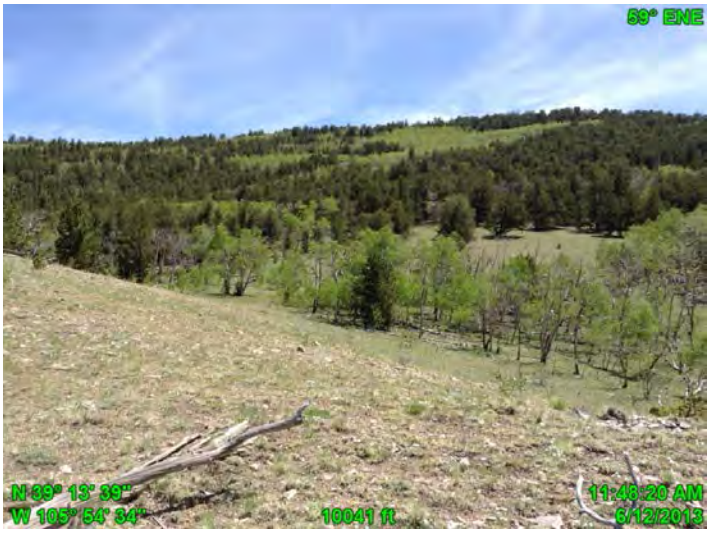
Reinecker Ridge (9) - SSW
Wildflowers among brush and montane grassland in NW unit; View of Mt Silverheels (left) (p. 8)

Reinecker Ridge (10) - E
Interior way shows heavy revegetation (p. 7)

Reinecker Ridge (11) - NNE
End of E way into likely hunting outpost (p. 7)

Reinecker Ridge (12) - S
View of snowcapped Mosquito Range from NW interior (p. 11)

Reinecker Ridge (13) - SSW
View of the Sangre de Cristo Mountains (left) and Buffalo Peaks (right) from the unit's NW interior (p. 11)



Reinecker Ridge (14) - ENE
High elevation mixed forest of aspen, bristlecone pine, and ponderosa pine atop Reinecker Ridge (p. 8,9)

Reinecker Ridge (15) - SE
Revegetation of N-S route in W unit (p. 7)

Reinecker Ridge (16) - SE
Revegetation of N-S route in W unit, further S (p. 7)

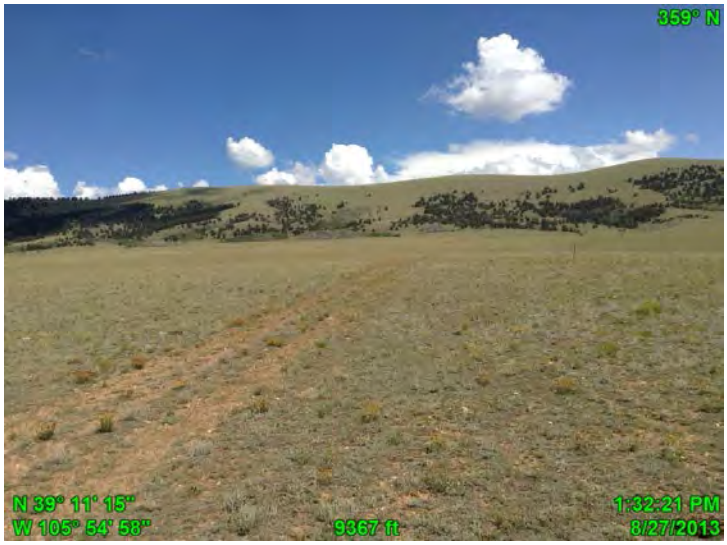
Reinecker Ridge (17) - ESE
Route junction at N-S route in W unit (p. 7)

Reinecker Ridge (18) - SE
End of way E of junction from N-S route in W unit (p. 7)

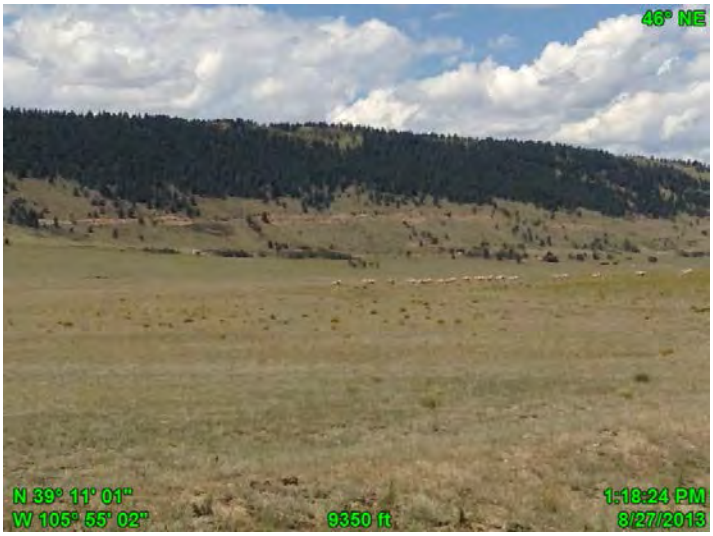
Reinecker Ridge (19) - NNW
Grasslands leading up to high elevation mixed forests and montane grasslands atop Reinecker Ridge (p. 8)

Reinecker Ridge (20) - SSW
Salt lick in central interior, W of Reinecker Ridge (p. 8)

Reinecker Ridge (21) - SSW
Black bear with cubs in central interior, W of Reinecker Ridge (p. 10)



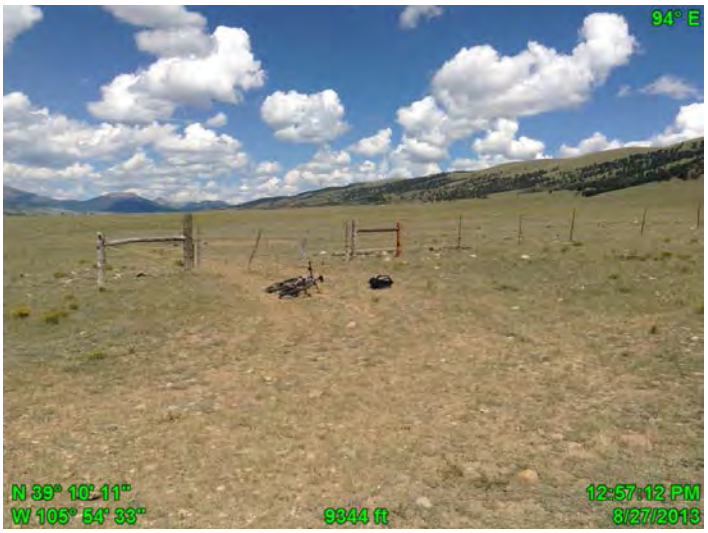
Reinecker Ridge (22) - N
N-S route in W unit exits unit to the SW (p. 7)



Reinecker Ridge (23) - NE
Herd of deer in W unit, Reinecker Ridge in background (p. 10)

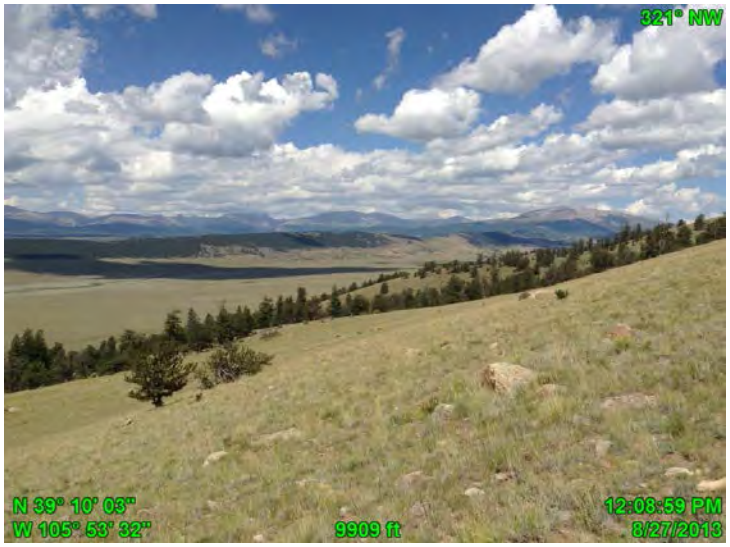
Reinecker Ridge (24) - ENE
Way from private property into SW unit (p. 7)

Reinecker Ridge (25) - SSE
Way loosely follows ditch in SW interior (p. 7)



Reinecker Ridge (26) - E
End of SW way at fence with gate (p. 7)

Reinecker Ridge (27) - NNW
SE boundary contiguous to James Mark Jones SWA atop Reinecker Ridge (p. 7)



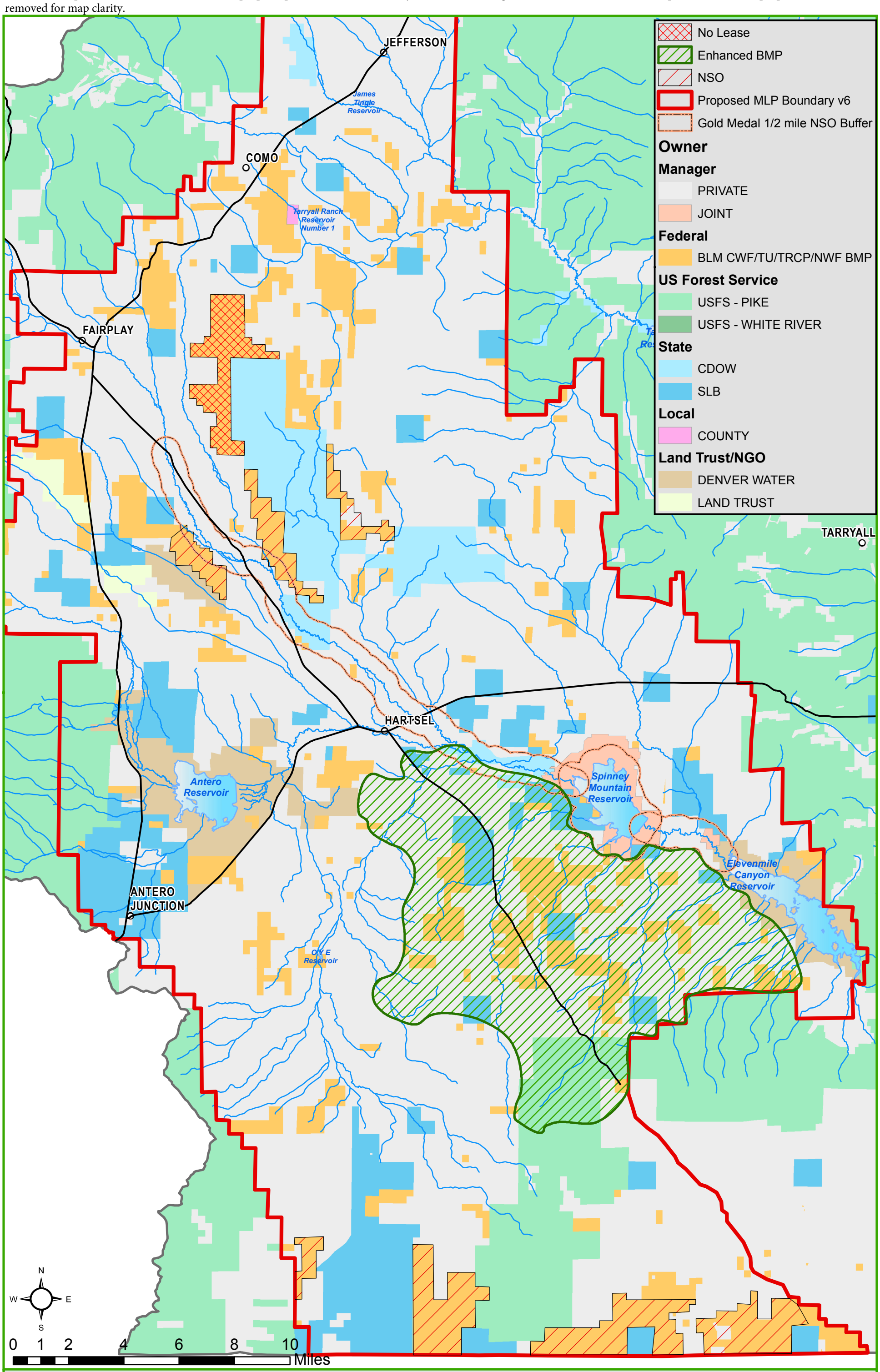
Reinecker Ridge (28) - NW
View of Mosquito Range from atop Reinecker Ridge (p. 11)

Reinecker Ridge (29) - SW
SE boundary point contiguous to James Mark Jones SWA, marked by fence with signs (p. 7)

Reinecker Ridge (30) - ESE
E boundary contiguous to James Mark Jones SWA, marked by a fence with state land signs (p. 8)

Appendix C: Wildlife Proposal: NSO, No Leasing, and Enhanced BMPs Areas

Note: This map was edited to reflect the wildlife proposal presented at the February 2015 MLP meeting, water setback buffers that were presented in other proposals were removed for map clarity.



Colorado Wildlife Federation, National Wildlife Federation, Trout Unlimited, Theodore Roosevelt Conservation Partnership
Wildlife Proposal No Surface Occupancy, No Lease, and
Enhanced Best Management Practices Areas within the South Park MLP Date: 3/20/15 v4

Appendix D: Water proposal #1 (Expansion of Colorado 317B Rules for River and Reservoir Setbacks)

Draft Setback Proposal for Drinking Water Protection

Denver Water, Colorado Springs Utilities, Colorado Department of Public Health and Environment, Trout Unlimited, Colorado Wildlife Federation

2/20/2015

This document proposes setbacks from water bodies within the Upper South Platte Watershed. These setbacks are proposed to protect primary drinking water reservoirs located in the center of South Park and are submitted for stakeholder review as part of the South Park Master Leasing Plan workshop convened by the Coalition for the Upper South Platte and the Keystone Center. The formatting of this document was updated but the content is as presented at the February 2015 MLP meeting.

Contents

Background and Justification for Protection

The Bureau of Land Management (BLM) is tasked with coordinating diverse land use management to support wildlife, resource and mineral extraction, agricultural uses, and watershed health while protecting the natural environment and water quality. A recent South Park Master Leasing Plan (MLP) effort has conducted diverse stakeholder meetings in order to provide BLM managers a way to strategically plan for oil and gas leasing and address potential resource conflicts in the Upper South Platte watershed. These stakeholder meetings were independently convened prior to the official BLM public outreach efforts. The MLPs are created to establish a guiding framework for the development of a given area and provide a vision for how development will occur.

The Upper South Platte watershed is a 2,600 square-mile watershed that reaches from the Continental Divide to Strontia Springs Reservoir, southwest of Denver. The watershed supports many uses including recreation, gold medal fisheries, wildlife, and drinking water supply reservoirs. The headwaters of the Upper South Platte watershed contains five major municipal supply reservoirs, including Antero, Spinney Mountain, Eleven Mile Canyon, Cheeseman, Strontia Springs and several other small reservoirs. These reservoirs supply drinking water to approximately one third of Colorado's residents.

Public drinking water sources are extremely valuable resources that deserve appropriate measures to prevent degradation from future land use activities. Contaminant impacts to drinking water resources not only increase public health risks but can also result in socio-economic impacts. Depending on the water service population and the extent of the impacts to water quality, the potential economic hardship to a public water system could be very costly. In addition, public drinking water resources are limited resources that are essential to communities and life processes, and should be provided with the highest level of protection.

Considering these factors, the Upper South Platte watershed and potential leasing area need to be carefully planned to protect the resources and the overall watershed health and function. Currently the State of Colorado has regulations through the Colorado Oil and Gas Conservation Commission (COGCC), referred to as Rule 317B (https://cogcc.state.co.us/RR_Docs_new/rules/300Series.pdf),that are focused on drinking water plant intakes or the last point of diversion prior to the treatment plant. The Upper South Platte watershed is a unique situation where water is stored, transported, and delivered through a series of conveyance structures, water supply reservoirs and then delivered to the water treatment plants for drinking water and other municipal and industrial uses. Although Rule 317B covers the Strontia Springs intake, the upstream pristine drinking water supply sources are not offered any protections under the rule because there are no direct use water supply designations on the upstream reservoirs.

Oil and Gas Master Leasing Plan Opportunities to Protect Valuable Resources

The Oil and Gas Master Leasing Plan aims to strategically plan and minimize unnecessary risk to sensitive environments and critical resource areas. The Colorado Oil and Gas Conservation Commission currently regulates oil and gas activities in relationship to general

oil and gas operations. However, the independently convened Oil and Gas Master Leasing Plan stakeholder group has formulated a few suggested preventative strategies to fill in some resource protection gaps in the Upper South Platte watershed. The Upper South Platte watershed is a critical water supply area for approximately one third of Colorado citizens and warrants additional protection measures to ensure a safe water supply and excellent water quality into the future.

Problem:

Contaminants from oil and gas surface events such as spills, pit and pipeline leaks, and nonpoint source runoff from surface disturbance have the potential to enter and impact surface water resources as well as environmental and recreational beneficial uses if these events occur in close proximity to water bodies. In headwater areas with drinking water supply reservoirs and infrastructure, Rule 317B does not offer protections for critical drinking water sources. Rule 317B regulates water quality protections only to water bodies immediately upstream of treatment plant intakes. Also, Rule 317B only addresses water supply use and does not offer upstream water quality protections for other beneficial uses, such as agriculture, recreation, and aquatic life.

If a contaminant release occurs into an identified drinking water supply reservoir or nearby upstream water supply infrastructure, the release could contaminate surface water and/or impact downstream water quality and drinking water operations. The potential risk to public drinking water supplies from oil and gas drilling activities in these upstream drinking water supply areas is elevated. Drilling exclusion zones and additional performance requirements are needed to protect water quality in these critically sensitive areas. Effective preventive measures are essential for water supply protection.

Solution:

If oil and gas surface activities are set-back from the immediate vicinity of surface water, wetlands, and designated source water protection zones, this provides an opportunity for accidental releases of pollutants to be detected and remediated before they reach water resources. If accidental releases are not detected, the setback provides a safety factor and some possibility of lessening the water resource impact prior to remediation. Setbacks also help prevent nonpoint source pollutants such as sediment from impacting surface waters and degrading ambient water quality throughout the watershed.

The existing 317b rule provides for the protection of designated Surface Water Supply Areas and Classified Water Supply Segments. The South Park MLP stakeholder group proposes expansion of the 317b rule to include source water supply river segments and reservoirs as well as critical supply infrastructure. For water supply protection, the proposed additional protection measures would require that oil and gas operations are located at a minimum distance of three hundred and one (301) feet from the ordinary high water mark on classified surface water supply segments /reservoir and critical drinking water infrastructure (internal zone). These protective measures would be required for a distance of five (5) miles upstream of a public water supply diversions, reservoirs, intakes, and public water system

infrastructure (see Figure 1). These respective distances are designed to minimize the impacts of contaminant releases in close proximity to drinking water surface supplies. In the event of an upset condition or contaminant release, these distances provide space and time for corrective actions to be implemented, and for water supply users to be notified of the event and take the necessary preventative actions.

The proposed five (5) mile upstream protection distance is consistent with Colorado State Statute 31-15-707 that allows municipal utilities to protect their waterworks from pollution sources five (5) miles from above the point at which water is diverted. This authority has been exercised by over thirty five (35) municipal governments across Colorado. The three hundred and one (301) foot minimum distance setback is based on an EPA Aquatic Buffer Ordinance recommendation that defines that storage of hazardous substances should be set back 300 feet from drinking water surface supplies.

The proposed protection measures would also include an intermediate buffer zone (301-500 feet) and an external buffer zone (501 ft – ½ mile) established in the provisions of COGCC Rule 317B. Specific language for Public Water System Protection begins on page 34 of the COGCC 300 rule series and protection requirements are detailed for each buffer zone through page 40. Closed pipelines for water supply transport (ex: Blue River Pipeline) will only have the internal and intermediate buffers and not the ½ mile external zone buffer applied.

Further, consider a designation of no surface occupancy (NSO) within and/or setback from other valued areas to preserve and protect significant resources and sensitive habitats. For example, one of the unique resources in the Upper South Platte Watershed is the exceptional fisheries and gold medal waters. Some of these Gold Medal waters extend into the 5 mile upstream protections that are recommended in this proposal and some do not. Further evaluation of these exceptional resources indicates that additional protections would be recommended for these Gold Medal waters.

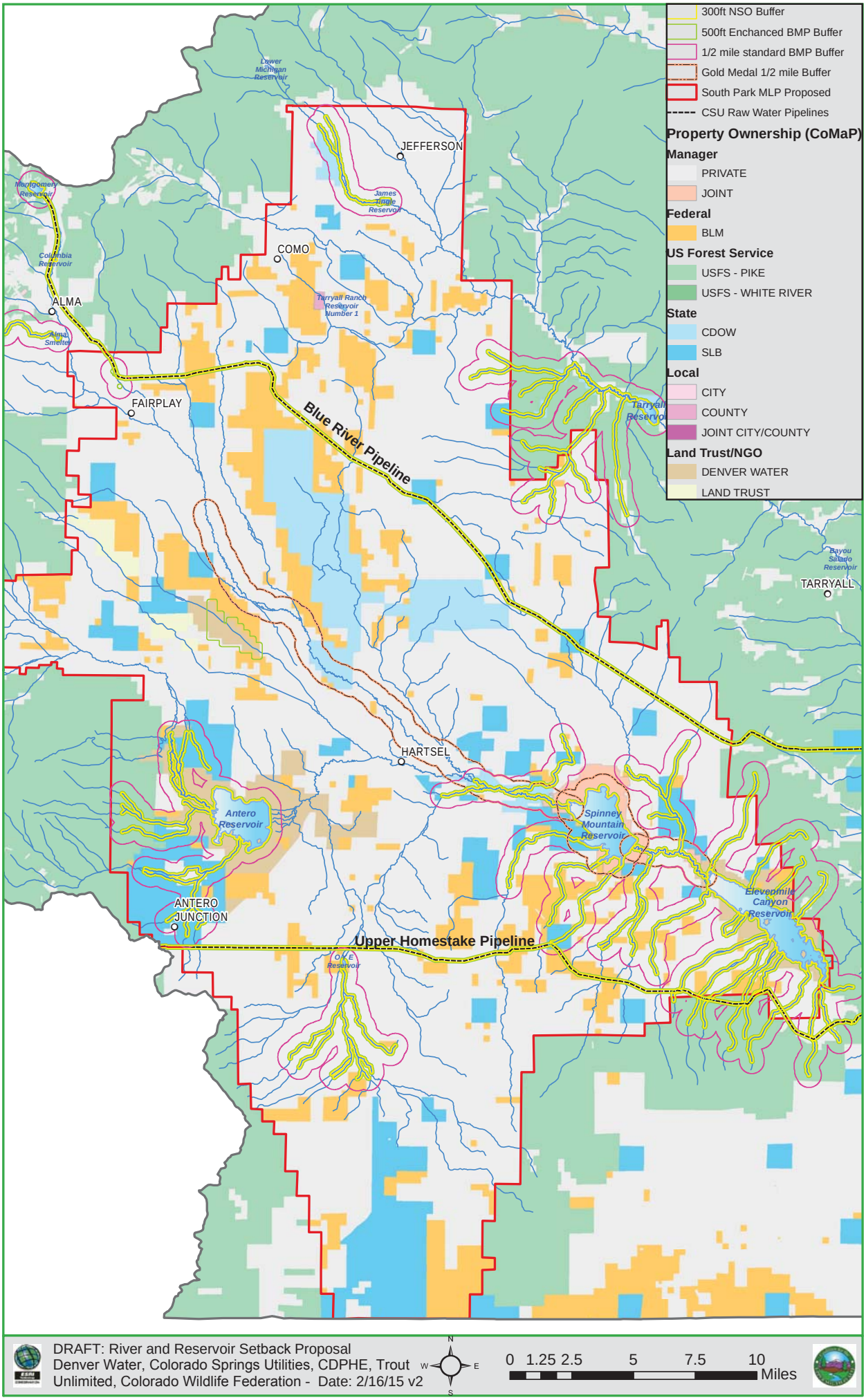
The protections proposed by this group would enact a NSO within stream channels, stream banks, and an area 2,640 horizontal feet (0.5 miles) either side of the ordinary high water mark (bank-full stage) of rivers/streams and Gold Medal reservoirs including the Middle Fork of the South Platte and Spinney Mountain Reservoir. This proposed NSO area is consistent with BLM visual resource management guidelines to protect exceptional fisheries, scenic values, visual impacts and riparian management based on impact analysis. The areas that this protection would apply to are defined on Figure 1.

The proposed drilling exclusion and enhanced best management zones are proposed to protect the Upper South Platte drinking water, fisheries resources, and other water uses from potential contamination that may degrade water quality below state and federal standards.

Additional Recommended Protections

This is an alternative recommendation to be considered by the BLM in addition to the alternative described above. The proposed 301 ft NSO buffer for first order or greater

perennial streams and drinking water reservoirs would be the minimum level of protection this group proposes for the South Park MLP for consideration in all proposed alternatives. Although, this minimal protection may not be adequate for the critically important water resources in South Park. The majority of the existing BLM Resource Management Plans and many United States Forest Service plans propose a greater NSO setback distance. Therefore the group further proposes oil and gas setbacks for protection of other beneficial uses by recommending NSO 500 feet from the ordinary high-water mark from streams, lakes, reservoirs, wetlands, and other riparian areas, 750 feet from water quality impaired water bodies, and 100 feet from ephemeral and intermittent drainages. These setbacks would be applicable to all stream segments and water bodies within the MLP area and not limited to drinking water reservoirs and five miles upstream of those reservoirs.


300ft NSO Buffer
500ft Enchanced BMP Buffer
1/2 mile standard BMP Buffer
Gold Medal 1/2 mile Buffer
South Park MLP Proposed
CSU Raw Water Pipelines
Property Ownership (CoMaP)
Manager
PRIVATE
JOINT
Federal
BLM
US Forest Service
USFS - PIKE
USFS - WHITE RIVER
State
CDOW
SLB
Local
CITY
COUNTY
JOINT CITY/COUNTY
Land Trust/NGO
DENVER WATER
LAND TRUST
Lower Michigan Reservoir
JEFFERSON
Montgomery Reservoir
James Tingle Reservoir
COMO
Columbia Reservoir
ALMA
Tarryall Ranch Reservoir Number 1
Alma Smelter
FAIRPLAY
Blue River Pipeline
Tarryall Reservoir
Bayou Salado Reservoir
TARRYALL
HARTSEL
Antero Reservoir
Spinney Mountain Reservoir
Elevenmile Canyon Reservoir
ANTERO JUNCTION
Upper Homestake Pipeline
Oke Reservoir
DRAFT: River and Reservoir Setback Proposal
Denver Water, Colorado Springs Utilities, CDPHE, Trout Unlimited, Colorado Wildlife Federation - Date: 2/16/15 v2
N
W
E
S
0 1.25 2.5 5 7.5 10
Miles

Appendix E: Water proposal #2 (500 foot NSO Setbacks for All Water Bodies)

BLM Master Leasing Plan proposal by Upper South Platte Water Conservancy District and Center of Colorado Water Conservancy District

On Feb. 11, 2015, the two districts met and decided to support Park County's Land Use Regulations for oil and gas operations for inclusion in BLM's South Park Master Leasing Plan, especially a 500 feet setback (no surface occupancy) from all water bodies (see definition below).
Reasoning: All surface water and all tributary groundwater eventually flow into a drinking water reservoir.

The districts also support the proposal of no surface occupancy within one half mile of all Gold Medal streams and lakes.

Park County's definition of water body:
A perennial or intermittent river, stream, lake, reservoir, pond, spring or wetland, but does not include irrigation ditches or roadway drainage ditches.
The districts support using this definition in SPMLP.

Other specific sections of Park County's regulations that should be included as stipulations in the SPMLP in order to protect water bodies and wildlife habitat are:
All oil and gas wells must use

1. A closed loop system,
2. Green hydraulic fracturing materials (this needs more definition)
3. Pit liners and removal of all material including the liner
4. Removal of all hazardous materials including drill cuttings.

The districts also support water quality monitoring of all aquifers found in groundwater wells and water bodies within a 1 mile radius of any oil and gas operation, including pre-drilling, during drilling and post drilling at intervals of 1 and 5 years plus any time a groundwater well owner or surface water owner has found chemicals associated with oil and gas operations in ground or surface water.
Reasoning: South Park's geology is very complicated and includes many areas of natural faults and fissures that could allow movement across geologic formations to impact water sources in a different geologic formation..
.
The districts will not support less stringent stipulations to the ones listed above.

The districts look forward to reviewing all proposed stipulations once they are received and deciding which ones to support.

Thank you,
Lynda James
On behalf of Upper South Platte Water Conservancy District and Center of Colorado Water Conservancy District

Appendix F: EPA Analysis: Example Fluid Mineral Setback/Buffer Stipulations for Surface Waters on Federal Lands/Minerals

Example Fluid Mineral Setback/Buffer Stipulations for Surface Waters on Federal Lands/Minerals

The purpose of the stipulations is to:
1) Maintain the proper functioning condition, including the vegetative, hydrologic and geomorphic functionality of the perennial water body.
2) Protect water quality and filtering values.
3) Provide a clean, reliable source of water for downstream users.
4) Benefit fisheries, amphibians, waterfowl, migratory birds, and other species dependent on aquatic and riparian habitats, as well as the habitat itself.
5) Scenic and recreation values

Resource Management Plan, Forest Plan, Environmental Impact Statement	**Stipulation (abbreviated)** **No surface occupancy (NSO), No surface disturbance (NSD), Controlled surface use (CSU)**	**Reference**
BLM		
Kemmerer Approved RMP and ROD; May 2010, (Wyoming)	NSO 500 feet: surface waters and riparian areas.	Appendix H, Page H-1; http://www.blm.gov/wy/st/en/programs/Planning/rmps/kemmerer/rod_armp.html
Fortification Creek RMP Amendment and ROD, August 2011 (Wyoming)	NSO 500 feet: surface waters and riparian areas (applied on a lease basis)	Appendix C, page 10, http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/bfodocs/fortification_creek/frmpa.Par.93837.File.dat/FRMPA.pdf
Grand Junction Field Office Draft RMP Dec. 2012, (Colorado)	NSO 1/4 mile: major rivers CSU 1/4-1/2 mile: major rivers NSO 328 feet: other perennial streams CSU 500 feet: other perennial streams	Pages 2-27 and 2-28: http://gvtrails.com/download/RMP/GJFO_Draft_RMP_EIS_Vol-I.pdf
Kremmling Proposed RMP/Final EIS; Feb 14, 2014, (Colorado)	NSO 325 Feet: Perennial streams, wetlands, springs, riparian NSO 50 feet: Ephemeral channels	Appendix B, page 3-37; http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/kfo-gsfo/KFO_PRMP_FEIS.html

White River Draft RMP; August 30, 2012, (Colorado)	NSO 500 feet: perennial waters, springs, wells, wetland/riparian areas. NSO 100 feet: ephemeral channels (inner gorge). CSU 500 feet: domestic wells.	Appendix A, page A-3; http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/white_river/ogdraftrmpa.html
Lander Field Office Planning Area ROD for Approved RMP and FINAL EIS; June 25, 2014, (Wyoming)	NSO 500 feet: perennial waters CSU 500 feet: domestic wells.	Appendix I; https://www.blm.gov/epl-front-office/projects/lup/18602/49179/53513/default.jsp?projectName=Lander+Resource+Management+Plan+Revision
Colorado River Valley Field Office Proposed RMP and Final EIS; February 14, 2014, (Colorado)	NSO 1/2 mile: major rivers (Colorado, Roaring Fork, Crystal, Frying Pan, Eagle, and Piney). NSO 328 feet: all perennial Streams, water bodies, riparian areas, and aquatic dependent species. NSO 1000 feet: for 5 miles upstream of public water supply intake.	Appendix B, pages B-16 through B-18; http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/kfo-gsfo/colorado_river_valley.html
Approved Rawlins/Continental Divide-Crestone RMP and ROD, Dec. 2008, (Wyoming)	NSO 500 feet: perennial waters, springs, and wetland and riparian areas, NSO 100 feet: inner gorge of ephemeral channels	Page 2-50, http://www.blm.gov/style/medialib/blm/wy/programs/planning/rmps/rawlins/rod.Par.91191.File.dat/05_Record_of_Decision_and_Approved_Rawlins_RMP.pdf
Moab Field Office Approved RMP and ROD, Oct. 2008 (Utah)	NSD: 100 meters of riparian areas and springs	Appendix A, Page A-5; http://www.blm.gov/ut/st/en/fo/moab/planning/rod_approved_rmp.html
Greater Natural Buttes Record of Decision; May 2012, (Utah)	No well pads in White River corridor viewshed up to 1/2 mile from White River; no well pads within 600 ft of White River in Indian country: no well pads located in 100-year floodplain of White & Green Rivers.	Page 3-2; http://www.blm.gov/style/medialib/blm/ut/vernal_fo/planning/greater_natural_buttes/record_of_decision.Par.86388.File.dat/Cover_ROD.pdf
Price Field Office Approved Resource Management Plan and Record of Decision; October 2008 (Utah)	NSO 330 Feet: perennial and intermittent streams; riparian areas.	Appendix R-3; http://www.blm.gov/ut/st/en/fo/price/planning/rod_approved_rmp0.htm
Little Snake Field Office Oil and Gas Lease sale Feb. 2015, (Colorado)	NSO 2500 feet: major rivers NSO 325 feet: perennial streams, wetlands, springs, seeps CSU 500 feet: perennial streams, wetlands, springs, seeps NSO 50 feet: ephemeral intermittent channels	Page 34; http://www.blm.gov/style/medialib/blm/co/information/nepa/little_snake_field/2014_documents/2014-0031-ea/30-day_comment_period0.Par.26938.File.dat/DOI-BLM-CO-N010-2014-0031%20EA_Updated102814.pdf

Bighorn Basin RMP Revision Project: Draft RMP & Draft EIS; April 13, 2011; (Wyoming)	NSO 500 Feet: surface waters and riparian areas	Section H.3.1. 3.1 Surface Disturbance Mitigation Guideline; https://www.blm.gov/epl-front-office/projects/lup/9506/19700/20213/default.jsp?projectName=BB+RMP
Dillon Resource Management Plan Record Of Decision/Approved Plan; February 2006; (Montana)	NSO 500 feet: perennial streams	Appendix L; Page 153; http://www.blm.gov/mt/st/en/fo/dillon_field_office/rmp/rod.html
Desolation Flats Natural Gas Field Development Project, 2004, (Wyoming)	NSO 500 feet: perennial streams	Appendix B, page B-1, http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/desflats.Par.77883.File.dat/00rod.pdf
Pinedale Oil and Gas EIS ROD, July 2000 (Wyoming)	NSO 500 feet: surface waters, wetlands, floodplains NSO 100 feet: intermittent streams	Appendix A, http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/anticline.html
Jonah Infill Drilling Project, 2006 (Wyoming)	Avoidance 500 feet: perennial streams, wetlands, riparian Avoidance 100 feet: ephemeral channels	Appendix B, page B-6; http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/pfodocs/jonah.Par.2814.File.dat/00rod2_b.pdf
Atlantic Rim ROD, March 2007 (Wyoming)	Avoidance 500 feet: perennial streams	Appendix C, page C-4; http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/rfodocs/atlantic_rim/rod.Par.46558.File.dat/ROD.pdf
Hiline Draft RMP and EIS; 2013 (Montana)	NSO 500 feet: perennial streams	Appendix E, page 911; http://www.blm.gov/mt/st/en/fo/malta_field_office/rmp/hiline_rmp.html
South Dakota Draft RMP/EIS, June 14, 2013 (All of South Dakota)	NSO 300 feet: Riparian areas, wetlands, 100 year floodplains of rivers and streams and water bodies	Appendix E, Page 1003, http://www.blm.gov/style/medialib/blm/mt/field_offices/south_dakota/rmp/drmp.Par.59875.File.dat/Appendices.pdf
USFS		

San Juan National Forest Resource Management Plan, Final EIS, ROD, September 2013, (Colorado)	NSO 325 Feet: Perennial streams, wetlands, springs, riparian NSO 50 feet: Ephemeral channels CSU 325-500 feet: Perennial streams, wetlands, springs, riparian CSU 50-100 feet: Ephemeral channels	Appendix H, Page 11, http://www.fs.usda.gov/detail/sanjuan/landmanagement/planning/?cid=stelprdb5432707
Fish Lake National Forest, Oil and Gass Leasing Analysis, ROD/EIS, August 2013 (Utah)	NSO 300 feet: streams, lakes, reservoirs, riparian areas, wetlands, and springs	ROD, page ROD-11; http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/24321_FSPLT3_1452301.pdf
Dixie National Forest Oil and Gas Leasing, August 2011 (Utah)	NSO 300 feet: streams, lakes, riparian areas, wetlands, and springs	Page 6 and C-29, http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5325460.pdf
Pawnee National Grassland Oil and Gas Leasing Analysis, Final EIS, December 2014, (Colorado)	NSO on all lands.	Page 26, http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/95573_FSPLT3_2393686.pdf
Policy or Guidelines		
BLM Utah Riparian Management Policy	NSD 100 Meters: riparian areas	
Wyoming BLM Mitigation Guidelines for Surface-disturbing and Disruptive Activities	NSD 500 Feet: streams and riparian areas	Page A-2, http://www.blm.gov/pgdata/etc/medialib/blm/wy/wildlife/baldeagle.Par.4022.File.dat/be-appa.pdf

Appendix G: South Park MLP Stakeholder Workshop Meeting Summaries

i. **October 6, 2014**
ii. **November 10, 2014, *includes table of compiled stakeholder resource interests and initial management suggestions***
iii. **February 24, 2015**

South Park Master Leasing Plan (MLP) Stakeholder Workshops
Meeting I: October 6, 2014
Alma Town Hall

Meeting Summary

Purpose of Stakeholder Workshops

The South Park Master Leasing Plan (MLP) Stakeholder Workshops bring together invited stakeholders in discussion of data, facts, perspectives, and management suggestions related to the South Park Master Leasing Plan (MLP) under development by the Bureau of Land Management (BLM). The master leasing plan that is being developed for South Park will establish a guiding framework and vision for future oil and gas leasing and development on federal public lands managed by the BLM. Key issues are identifying and addressing resource conflicts, objectives for resource conditions and resource protections.

The workshops will engage public and private sector stakeholders including interests related to but not limited to: oil and gas development, wildlife/habitat conservation, water, homeowners, cattlemen and other agriculture interests, land management, and recreation interests. These meetings are independently convened by the Coalition for the Upper South Platte and The Keystone Center and are not a part of the formal BLM process.

South Park Master Leasing Plan Stakeholder Workshop Goals:

1. Engage the public and stakeholders in a formal and open process to learn about and provide feedback on the South Park Master Leasing Plan
2. Build relationships, trust, and understanding across diverse public and stakeholders
3. Build knowledge of and access to a common set of data and facts upon which Master Leasing Plan decisions would be made
4. To the extent possible, develop and propose to the Bureau of Land Management (BLM) a community-driven set of recommendations regarding the South Park Master Leasing Plan
5. Through discussions related to the South Park Master Leasing Plan, create awareness of stakeholder interests and perspectives that may inform leasing decisions on other lands

Meetings will culminate in synthesizing and sharing the range of interests and recommendations identified through discussions (e.g., in the form of a report available to participating stakeholders and the public that reflects the outcomes of discussion). The exact nature and content of such a deliverable will be directed by the participating stakeholders based on the discussions in the meetings. It may include a description of interests, areas of concern, data (e.g., mapping layers), and facts, and management recommendations (e.g., common ground recommendations and/or the range of recommendations identified by the stakeholders).

October 6 Workshop Outcomes- this meeting:

- Introduced the MLP process, why it is important, the BLM's timeline and decision process for the MLP, and how stakeholders can inform it.
- Reviewed the BLM's current leasing management framework for the area (as determined by the Resource Management Plan).
- Enabled stakeholders to share and discuss their interests and concerns related to leasing in the area, begin to understand where interests align and diverge and how this could impact potential stakeholder recommendations for the MLP, and begin to generate initial ideas regarding potential recommendations.
- Determine the data and data layers that are needed for the group to make an informed set of recommendations

Participation: Please see Appendix A for a list of participants and their contact information

Action Items:

- Tom Eisenman (Park County) will draft an email to the proper BLM representative in Washington D.C requesting that the SP MLP process not be delayed by the implementation of Planning 2.0; Tom will share the email and any stakeholders that wish to sign on are invited to do so.
- Keystone and the Coalition for the Upper South Platte (CUSP) will ask via email that stakeholders send info, documents, links, data and other resources; CUSP will organize a bibliography.
- Stakeholders will send map layers to CUSP and an interactive GIS-based map will be developed that includes the list of needed map layers found in section IV.A. of this summary (below).
    - CUSP will discuss with the BLM GIS staff person at what scale the data layers need to be submitted and share this information with the group.
    - Keystone/CUSP will send the link to the interactive map to participants for their use in the MLP commenting and the developing of recommendations through this workshop process.
- For the November 10th meeting, Keystone will organize presentations on Drilling 101 including the terminology, BMPs and Standard Industry Practices, cumulative impacts, and current standards and stipulations.
- Keystone/CUSP will develop and send out a homework assignment for participants in the form of a matrix that will capture recommendations related to the MLP.

Next Meeting: November 10th, 10am-3:30pm at the Alma Town Hall, subsequent meeting if needed will be December 8th

Meeting Notes:
October 6, 2014 South Park MLP Workshop Schedule

I. Review of purpose, objectives, and guidelines for workshops and meeting agenda

Julie Shapiro (Keystone Center) described the purpose of the workshops as bringing together interested stakeholders to discuss perspectives, facts, data and interests in order to identify the resources that stakeholders are concerned about and how resource conflicts can be addressed. She noted that the workshops do not constitute a Federal Advisory Committee, are not convened nor requested by the Bureau of Land Management and do not supplant the public comment period for the Resource Management Plan (RMP) or Master Leasing Plan (MLP). The group, she explained, will begin by first learning what a MLP is, then share interests and recommendations and then narrow toward consensus-based recommendations if possible.

II. Update on Master Leasing Plan Process and Baseline Condition – Keith Berger (BLM)

Keith Berger discussed the process for oil and gas leasing on BLM land and the purpose and process for the Master Leasing Plan. He explained that although the BLM has limited surface rights in the preliminary MLP geographic boundary (61,000 acres), it also has subsurface mineral rights (280,000 acres). Areas where BLM owns the mineral rights but not the surface rights are called split-estate. Keith explained the process that companies need to go through to lease parcels for oil and gas development on BLM land, what a MLP is and how it fits into the RMP.

A. What is the process that companies need to go through to lease parcels for oil and gas development on BLM land?

The process has three stages including:

1. Resource Management Plan (RMP)- planning for all activities over the entire field office (resource development, grazing, recreation – all multiple uses) large allocations
    - Last RMP developed in 1996
    - Sets which acres will be made available for development
    - Sets stipulations (i.e., Critical big game winter habitat) and restrictions such as timing
    - Stipulations are fairly broad
2. Annual lease sale
    - A company can nominate a parcel any time of the year
    - A lease sale will occur in November of every year
    - The first step is public scoping – concerns/issues with the nominated parcels
    - Then the BLM writes an Environmental Assessment (EA) and the public has the opportunity to review the draft
    - There is a protest period and then the EA is finalized
    - Then the sale occurs
3. If a company has bought a lease and would like to drill, it submits an Application to Permit Drilling (APD)
    - This begins another round of EA that is specific to the parcel
    - A site-specific analysis will be completed in this EA

B. What is an MLP and how does it fit into a RMP?

Keith Berger (BLM) explained that a MLP is a written strategic plan that states how oil and gas development will occur in a given area of BLM-managed land. It is a guiding document

that states what parcels are available for leasing and what areas are not available for leasing as well as the stipulations and restrictions for those areas that are available for leasing. The MLP makes the same decisions as an RMP but at a finer resolution and has the flexibility to include stipulations, specifics reclamation requirements, phased development, Best Management Practices (BMPs) and infrastructure requirements such as the need to utilize pipelines to limit impacts. The MLP will nest within the larger RMP and will either be an appendix to the RMP or contained throughout the document. Both developed through use of Environmental Impact Statements (EISs) that analyze a range of alternatives including a no action alternative that would essentially default back to the 1996 RMP.

The RMP will begin when the Notice of Intent (NOI) is published in the federal register. This was supposed to occur on Sept. 26 but it has yet to happen; it is determined at the federal level and out of the hands of the local field office. Once the NOI is published, a 60-day public comment period will begin that will include 6 public hearings throughout the state. These meetings will provide information to the public and also seek public comment. The Draft RMP is expected in late 2015 and the Final RMP is anticipated in early 2017.

Keith also noted in his presentation and during the question and answer session that:

- In Spring 2014, the Colorado BLM issued an Instructional Memo that stated that in areas that are formally going thru an MLP process there will be no action taken on nominated parcels (although currently there aren't any nominated parcels)
- The planning for the MLP only applies to BLM land and not to other lands within the boundary such as US Forest Service (USFS) or State Land Board – although these and several other state and federal agencies have been invited to become cooperating agencies
- The MLP may go back and remove areas from leasing that were leasable under the RMP
- There are no limits to the number of parcels that can be leased in a given sale although there is a limit on the number of parcels that they can actually process in a given year
- The BLM is utilizing a new planning approach, Planning 2.0, that will streamline their land use planning efforts
    - There is a set of decisions for each type of land use and in the past the decisions for these have been made fairly independent of each other
    - Planning 2.0 looks at these decisions more holistically and at a landscape level
    - It is not anticipated that Planning 2.0 will delay the SP MLP however there were stakeholder concerns on this topic
        - **ACTION** – Tom Eisenman (Park County) will draft an email to the proper BLMN representative in Washington D.C requesting that the SP MLP process not be delayed by the implementation of Planning 2.0; Tom will share the email and any stakeholders that wish to sign on are invited to do so

II. Sharing and Discussion of Stakeholder Interests, Concerns, and Initial Ideas related to the South Park MLP

All Participants were given the opportunity to speak briefly regarding their interests, concerns and initial ideas regarding the SP MLP. The following summarizes the interests we heard from the local, state and federal agencies, as well as the environmental, water, ranching, and industry sectors.

A. AGENCIES

The agencies that were represented have discrete and diverse mandates and interests. They are concerned with the potential environmental impacts of oil and gas development and need to balance the environmental concerns with the economic implications of development and the multiple-use mandate of public lands. Some of these agencies have a regulatory role such as the U.S. Environmental Protection Agency (EPA) and the Colorado Dept. of Public Health and Environment (CDPHE). Others such as Park County and Senator Bennet's office have an interest in ensuring that the diverse perspectives of their constituents are met. All expressed the need for the public to play an important role in commenting on the plan that will guide the future of development in South Park. They were supportive of the process and encouraged by the communication and discourse. Below please find descriptions of general themes from the agency sector.

- An agency representative stated that with any development there will be impacts and there is a need to minimize these impacts on the public lands. The resources that need to be considered include: water quality and quantity, air quality, wildlife, social and economic impacts, public health, environmental health, and cultural resources, among others.
- An agency representative stressed the need to balance public health and economic development. The representative thought it important to look at the work of other MLP processes and integrate their lessons learned so that the SP MLP can set a precedent that's defensible and applicable to other MLPs that occur in the future. It is important to agree to setbacks that protect water quality and are consistent with Colorado Oil and Gas Conservation Commission (COGCC) state regulations.
- It was suggested that setbacks of discharges be no closer than 5 miles upstream from drinking water intakes; 300 foot No Surface Occupancy (NSO) from streams; 300-500 foot setbacks for certain BMPs and stipulations; ½ mile setback from external zones and additional BMPs that are less restrictive as well as other groundwater setbacks. These setbacks were agreed to by industry and COGCC and can provide consistency although currently drinking water well setbacks are not in place.
- There was interest in protecting terrestrial and aquatic resources and the need to consider a basin-wide view of wildlife planning. A representative noted that hunting, fishing and wildlife watching brings millions of dollars to the area and this economic driver should not be impacted by oil and gas development.
- An agency representative noted that a geologic and groundwater map of the area had been developed and is available online. The mapping exercise has shown that we don't fully understand the complex geology of this frontier area so the MLP needs to broad in scope and flexible until exploratory bores can tell us more. The Niobrara Shale has traditionally been the source of development but as science and technology change over time and as petroleum prices rise, areas that have not been traditionally leased (such as the Belden Shale) may be attractive to industry.

- An agency representative stated they were most interested in air and water resources but also focused on the cumulative impacts of proposed projects. They are interested in seeing well thought-out plans on water quality and quantity including monitoring plans for potential impacts; source water protection plans that include setbacks; well structure design plans that are protective of aquifers; and BMPs for specific areas, both at the RMP and MLP levels. There are examples of past comment language that can be used and distributed to stakeholders as examples of the types of comments that are useful in EISs.
- A representative noted that they are supportive of the MLP effort and happy to see the process beginning and the stakeholders in the room communicating.

B. ENVIRONMENTAL ORGANIZATIONS

The themes from the environmental organizations have been summarized together below. The environmental organizations have an interest in protecting public lands and the wildlife, fisheries and their habitats and migration corridors as well as water and air resources contained therein, from the impacts of oil and gas development. There is a general sentiment that there needs to be balance between conservation and development and that this can be accomplished through smart planning and the use of BMPs, restrictions, stipulations and setbacks from sensitive areas. Other themes include the need to specifically protect:

- 207 jobs and $7 M/year in recreation that relies on public lands in South park
- Native green back trout and their native watershed
- Wetlands
- Sensitive wildlife habitat and fisheries
- Wild and pristine characteristics
- Absence of roads
- Water quality and quantity
- Air quality
- Area from Off-road vehicles
- Rural lifestyle
- Dark skies
- Quality of life
- Area in the long-term
- Area from negative boom and bust economies
- Biodiversity
- High Creek Preserve – rare plants
- 34 CO Natural Heritage Program – tiered rare plant species and high biodiversity
- 7 state wildlife areas – Wilderness/wildlife linkages
- Connectivity – and major barriers to migration
- Areas from noise pollution
- BLM holdings north of Reinecker Ridge

Other themes included:

- Set a model here and be a leader for future MLP's around the West
- Setbacks:
    - There needs to be consistent and robust riparian set-backs
    - There needs to be different and better setbacks for fisheries – not only gold medal, green back and cutthroat

        - Setbacks could exceed COGCC guidelines and be South Park-specific
        - Need hard setbacks for oil and gas with no exclusions or BMPs that allow encroachment
    - Stipulations need to be rooted in BLM policies
    - Help the public participate – host workshops that educate the public on how to engage
    - Balance between oil and gas and conservation
    - Smart from the start energy planning
    - Contribute to the development that identifies the right places and parameters for development
    - Riparian setbacks – 300 feet for gold medal streams only
    - Document the info and data gaps that we are all working from

C. WATER INTERESTS

The themes from the water interests have been summarized together below. The water interests feel that it is important to protect water quantity and quality from the potential impacts of oil and gas development and the potential for spills. Their infrastructure, rights of way, water rights and dams and source waters are also important. Other general themes include:

- Protect the surface waters
- Protect water quality and quantity
- Setbacks are important to define - have setbacks start at riparian area
- Protection of land around all reservoirs
- Dam safety and the potential for earthquakes caused by fracking
- Drought water supply
- Need to have groundwater setbacks
- Wetlands above and below reservoirs feed the reservoirs – so if there were spills it could have severe negative impacts
- The protection of floodplains
- Concern with long response time in the wake of a spills
- The protection of fens is of concern as is the general protection of wetlands
- Surface spills are a concern that are adjacent to reservoirs
- Protect their water rights and the water rights of constituents
- Stricter setbacks from waterways, riparian areas with no exclusions
- Environmental and recreational focus areas are recommended for protection or improvement
- Rare plants and biodiversity are of concern
- Source water protection around their reservoirs
- Water system infrastructure and operations of their systems
- Protect the ability to construct new facilities as some facilities and infrastructure are old
- Future water storage to capture conditional water rights
- Special use permits and right of ways for the pipelines
- Understand the constraints that may be opposed on them
- BMPs and monitoring plans are important to be included and be effective
- There is a need for more collaboration and coordination and partnerships
- Keep the important sensitive areas protected with setbacks and other rules and BMPs

D. CATTLEMEN

The cattle interests expressed that cattlemen generally co-exist with oil and gas development. They receive an economic benefit from development as some of them are provided free natural gas and/or an additional income source. It's important that there aren't too many layers of bureaucracy and there was a sense that there are currently enough safeguards to protect their interests. There are 20 ranchers in the valley and they have influenced the landscape for generations. Cattlemen support surface water source protection for cattle. They don't want to be forced to drill wells because the banks need to be protected from erosion. Overall, the ranching community would like to be supported.

E. INDUSTRY

Industry described their environmental and conservation interests and felt that with the proper BMPs and use of technology impacts from development can be minimized or even eliminated. It was stated that keeping the land protected is of utmost concern and that if the land cannot be protected then development should wait to occur until the right technologies can be put in place. Specific BMPs and technologies that can be employed included:

- Build non-permanent roads- access mats- 90% of grasses survive
- Downsize the impact – understand how to get the people, services and equipment in without major permanent impacts
- Minimize how many trucks go in through detailed planning
- Utilize temporary pipelines
- Do containment under the whole site to capture all fluid is captured including rainwater
- Spills are minimal, are small when they do occur and are well documented
- The technology is there to monitor leaks

ACTION- Keystone and CUSP will ask via email that stakeholders send info, documents, links, data and other resources in and CUSP will organize a bibliography

III. Observer Comments

Observers were given the opportunity to speak briefly. The following are the observer comments:

- There is a concern with possible uranium mining in the area and these types of comments can be addressed under the RMP
- Micro-earthquakes through the process of fracking is a concern- there is a suggestion that observing using seismology before, during and after is needed
  - Colorado does not have a good seismic monitoring system
  - SP could be a good candidate for increased seismic monitoring
- Cultural and archeological resources need to be protected
- Instead of debating the 100's of feet for setbacks- look at the resource that needs to be protected and then assess the level of protection that's needed for that resource
- A conversation ensued over which rules apply to what areas – what is the hierarchy/precedence of regulations and how are the enforced – local, state, federal
  - COGCC rules apply statewide

- There needs to be a logical basis for higher restrictive regulations or industry will push back
- The COGCC rules and RMP rules are minimums that will apply within the MLP
- MLP rules and guidelines will only apply to BLM lands and not private or state lands
- **ACTION** –a presentation will be given during the November 8th meeting outlining which rules and regulations apply to which areas and how those rules and regulations are applied and enforced

- There was a comment that the MLP language should be kept together within the RMP (carved out in a separate section) rather than being sprinkled though-out the RMP

IV. Review of Key Themes of Interests and Concerns; Identify and Begin In-Depth Discussion of Priority Issues and Geographic Areas and associated Recommendations

A. Review of map layers

The group reviewed and discussed the map layers and discussed historic wells as well as currently leased parcels, water quality data and wildlife data as well as fisheries layers. It was noted that the original map of the MLP boundary was developed by looking at the overlap between wildlife habitat and oil and gas potential.

ACTION – Stakeholders will send their map layers to CUSP and an interactive GIS-based map will be developed and the link will be sent to participants for their use in MLP commenting and the developing of recommendations through this workshop process.

- Participants identified the following list of additional map layers needed:
  - The BLM's Reasonable Foreseeable Development data layer
  - The current locations of all seismic stations for monitoring earthquakes
  - Migration corridors
  - Cultural resources
  - Pipelines
  - Small reservoirs (James Tingle, Smelter pipeline)- double check that all reservoirs are included
  - Source water protections, key diversion points – CDPHE will supply this layer
  - Wilderness Characteristics Inventory
  - Conservation easements – CO Coalition of Land Trusts may have this data layer
  - Heritage sites
  - Wetlands and fens
  - 2-tracks (small roads) – possibly use CO Tiger roads
  - Who has water to sell and where will the point of sale occur- reach out to the state engineer
  - BLM land adjustment planning map- id parcels for retention and possible exchange.
  - Soils- we have USGS data gateway, need NRCS layer
  - Elevation model –currently have 10M DEM
  - Surface spills –one participant stated there has been an average of over 400 spills per day statewide; however participants also discussed that there would not be spill layer data in South Park

- Tributary and non-tributary wells: There is DNR rules based on wells and well location rules – tributary vs non-tributary – note that all wells in SP have been designated as tributary and it's up to the lease to prove its non-tributary

ACTION- CUSP will discuss with the BLM – at what scale the data layers need to be submitted and share this information with the group

B. Review of key themes from morning presentations

The group reviewed what the MLP can consider and generated the following list:

- Available/not available for leasing
- Phased development
- Total acreage
- Stipulations
- Setbacks for streams vs reservoir
- Infrastructure
- BMPs (pads, access mats etc.)
- Cumulative impacts

ACTION –For the November meeting, Keystone will organize presentations on Drilling 101 including the terminology, BMPs and Standard Industry Practices for the November meeting, cumulative impacts, and current standards and stipulations

ACTION – Keystone/CUSP will develop and send out a homework assignment for participants to capture their recommendations for the MLP.

Appendix A
Participant list and contact information

First	Last	Organization	Sector
Participants			
Misi	Ballard	Great Old Broads for Wilderness	Environmental group
Peter	Barkmann	Colorado Geological Survey	Government
Briggs	Cunningham	Center of Colorado Water Conservancy	Water Provider
Reid	DeWalt	Colorado Parks and Wildlife	Government
John	Duggan	Colorado Department of Public Health and Environment	Government
Bill	Dvorak	National Wildlife Federation	Environmental group
Tom	Eisenman	Park County	Government
Eric	Howell	Colorado Springs Utilities	Water Provider
James	Ingalls	Diamond T Services, Bar Star Energy LLC, Bar Star Land LLC	Industry/Cattlemen
Lynda	James	Upper South Platte Water Conservancy District	Water Provider
Don	Kennedy	Denver Water	Water Provider
Aaron	Kindle	Trout Unlimited	Environmental group
Gregory	Oberley	U.S. Environmental Protection Agency	Government
Terry	O'Neil	Park County Advisory Board on the Environment	Government
Suzanne	O'Neill	Colorado Wildlife Federation	Environmental group
Juli	Slivka	The Wilderness Society	Environmental group
John	Sztukowski	Wild Connections	Environmental group
Dave	Harvey	Colorado Cattlemen's Association	Cattlemen

Observers			
First	**Last**	**Organization**	**Sector**
Diane	Ambrose		
Darcy	Campbell	Citizen/Former EPA	Citizen
Ramon	Castro	Save Our South Park Water	Environmental Group
Keith	Berger	Bureau of Land Management	Government
Annie	Halpin		
Jim	Halpin		
Noah	Koerper	Office of U.S. Senator Bennet	Government
Gary	Nichols	Park County	Government
Shelia	Pelczarski	Denver Water	Water provider
Tom	Schreiner	CO Parks and Wildlife	Government
Facilitation Team			
Carrie	Adair	Coalition for the Upper South Platte	
Jara	Johnson	Coalition for the Upper South Platte	
Matt	Mulica	The Keystone Center	
Julie	Shapiro	The Keystone Center	

South Park Master Leasing Plan (MLP) Stakeholder Workshops
Meeting II: November 10, 2014
Alma Town Hall

Executive Summary

Purpose of Stakeholder Workshops

The South Park Master Leasing Plan (MLP) Stakeholder Workshops bring together invited stakeholders in discussion of data, facts, perspectives, and management suggestions related to the South Park Master Leasing Plan (MLP) under development by the Bureau of Land Management (BLM). The master leasing plan that is being developed for South Park will establish a guiding framework and vision for future oil and gas leasing and development on federal public lands managed by the BLM. Key issues are identifying and addressing resource conflicts, objectives for resource conditions and resource protections.

The workshops will engage public and private sector stakeholders including interests related to but not limited to: oil and gas development, wildlife/habitat conservation, water, homeowners, cattlemen and other agriculture interests, land management, and recreation interests. These meetings are independently convened by the Coalition for the Upper South Platte and The Keystone Center and are not a part of the formal BLM process.

South Park Master Leasing Plan Stakeholder Workshop Goals:

1. Engage the public and stakeholders in a formal and open process to learn about and provide feedback on the South Park Master Leasing Plan
2. Build relationships, trust, and understanding across diverse public and stakeholders
3. Build knowledge of and access to a common set of data and facts upon which Master Leasing Plan decisions would be made
4. To the extent possible, develop and propose to the Bureau of Land Management (BLM) a community-driven set of recommendations regarding the South Park Master Leasing Plan
5. Through discussions related to the South Park Master Leasing Plan, create awareness of stakeholder interests and perspectives that may inform leasing decisions on other lands

Meetings will culminate in synthesizing and sharing the range of interests and recommendations identified through discussions (e.g., in the form of a report available to participating stakeholders and the public that reflects the outcomes of discussion). The exact nature and content of such a deliverable will be directed by the participating stakeholders based on the discussions in the meetings. It may include a description of interests, areas of concern, data (e.g., mapping layers), and facts, and management recommendations (e.g., common ground recommendations and/or the range of recommendations identified by the stakeholders).

November 10, 2014 Workshop Outcomes: At the November 10 meeting, participants…

- Discussed initial stakeholder recommendations regarding the South Park Master Leasing Plan
- Reviewed current state and federal standards and stipulations that apply to the South Park area, and how they relate to each other
- Reviewed how BLM considers cumulative impacts of oil and gas leasing
- Identified interests and next steps related to further developing and finding common ground on recommendations

Participation: Please see Appendix A for a list of participants and their contact information

Action Items:

- All- please contact Carrie Adair at carrie@uppersouthplatte.org if you would like a specific map configuration put together for your needs and indicate whether you would like it in Google Earth vs ArcMap
- Carrie will add the Air Pollution and Control Division Layer from CDPHE
- All- please continue to send resources and data layers to Carrie and Jara for uploading to the resources website
- The Keystone Center/CUSP will provide a meeting summary of this meeting and send it out for participant review along with a scheduling poll for a February 2015 meeting
- Participants planning on attending the third meeting will refine their recommendations based on the November 10 discussions
- The Keystone Center/CUSP will develop homework assignments/joint tasks for refining ideas regarding wilderness characteristics and other special areas (e.g., gold medal streams, conservation easements), water, wildlife, and cumulative impacts

Next Meeting: February 2015. Exact date to be determined based on results of scheduling poll

Meeting Notes:
November 10, 2014 South Park MLP Workshop Schedule

I. Welcome, Review of Purpose and Resources website: Julie Shapiro, (The Keystone Center) & Jara Johnson and Carrie Adair, (Coalition for the Upper South Platte)

Julie Shapiro welcomed the group and reviewed the meeting purpose, which was to capture the range of perspectives around the table and generate understanding among the various stakeholders. She explained that a third meeting would be held if desired, with a purpose to drill down further into management suggestions and build consensus, where possible, on recommendations to the Bureau of Land Management (BLM).

Jara Johnson and Carrie Adair reviewed the Resources website that had been set-up for the group. The website (http://cusp.ws/south-park-mlp/) houses an interactive map that is sharable, printable and has the ability to measure distance. It includes data layers requested by the group as well as those sent in to the Coalition for the Upper south Platte (CUSP) by participants. Carrie asked that participants send her requests if they would like configurations that include specific layers, labels and imagery toggled on. Beyond the interactive map, the resources site houses links for examples of regulations, stipulations and BMPs, Colorado oil and gas leasing backgrounds documents, as well as information on South Park water resources.

Action items:

- All- please contact Carrie Adair at carrie@uppersouthplatte.org if you would like a specific map configuration put together for your needs and indicate whether you would like it in Google Earth vs ArcMap
- Carrie will add the Air Pollution and Control Division layer from CDPHE
- All- please continue to send resources and data layers to Carrie and Jara for uploading to the resources website

II. Review of current oil and gas development standards and stipulations that apply to the South Park area

A. Colorado minimum standards and how do the state and federal standards relate to each other: Greg Deranleau, (Colorado Oil & Gas Conservation Commission, COGCC)

Greg Deranleau discussed the COGCC and the rules and regulations that it administers. The COGCC was created in 1951 to foster the responsible development of oil and natural gases while protecting public health, safety, and welfare including the environment and wildlife. It conducts field tests, administers leasing applications and conducts a public consultative process on all leases. It administers and ensures leasees are adhering to construction standards and water protection rules. It also administers rules and conducts testing to ensure that wells are engineered to regulated levels of integrity. Please see slides for specifics.

B. Current stipulations of the Royal Gorge Resource Management Plan Keith Berger, (BLM)

Keith Berger reviewed the oil and gas stipulations that BLM can apply during the Resource Management Plan (RMP) process, the site-specific stipulations that it can employ during the Application to Permit Drilling (APD) process and the unique set of stipulations that it can employ during the Master leasing Plan (MLP) process. He discussed how the various county, state and federal regulations interact. He noted that in a split-estate situation, an applicant who is drilling on federal lands has to apply for a COGCC permit as well as go through the federal process. This applicant also has to abide by all federal laws such as the Endangered

Species Act and also local laws in which counties have purview such as regulating impacts to roads. Keith also noted that the federal and COGCC rules often apply the same stipulations for congruency. The following notes and conversation themes were captured:

- If a land owner is concerned about specific ground water issues – can the land owner ask for specific additional testing to be done if site-specific data points toward the need for more data?
    - It would have to be done within the existing regulatory structure and this would be done during the Environmental Assessment (EA) process of the APD process.
    - This site-specific data can also feed into the public comment process of COGCC.
    - The State Land Board also has a public comment period.
- In a split estate situation, can the BLM apply surface stipulations to private lands? BLM can enforce federal laws (e.g., the Endangered Species Act (ESA) and the Federal Migratory Bird Act). However, big game winter range laws for and visual resource management rules cannot be enforced on private lands, but can be recommended.
- The question of whose regulatory authority has governance over different lands is complicated due to split estate. Regulators have authority to regulate only certain things.
    - In the case of split estates with federal subsurface mineral rights, there is an ability to include stipulations early in the process.
    - The State Land Board also has the ability to identify stipulations early in the process.
    - Federal regulations apply on federal land and also if they are programmatic – e.g., ESA and spill acts apply.
    - COGGC regulations are bound by oil and gas development. The State regulates air and water quality through CDPHE. The agencies try to keep these functioning in a cohesive manner.
    - Local government and counties have regulatory authority over certain things – e.g., truck traffic. Traffic on the roads is still the local government's authority. The county can restrict truck traffic generally on a county road, but if it tries to restrict oil and gas traffic specifically on a county road, it could end up with a regulatory conflict.

C. Overview of BLM Cumulative Impact analysis, Keith Berger (BLM)

Keith Berger described how the BLM analyzes and evaluates cumulative impacts of oil and gas development in its planning process. He described the 6 chapters of an Environmental Impact Statement (EIS) and said that an analysis of cumulative impacts fits into Chapter 4 – Environmental Consequences. This analysis of all impacts associated with each alternative analyzed in the EIS includes an evaluation of cumulative impacts. Keith noted that BLM is still determining where the MLP will fit into the RMP. Please see below for notes and conversation themes.

- 6 chapters of the EIS
    1. Purpose and need

2. Range of Alternatives that meets the needs of concerns they heard in public scoping
    - No-action alternative
    - Range of alternatives, often along a spectrum of interests
3. Affected environment, on a program level (timber, wildlife, fisheries, etc)
4. Environmental consequences: Impacts of each alternative
    - This is where cumulative impacts are captured
5. Consultation and coordination: who did BLM talk to and what did it do to incorporate this information
6. References

- The RMP uses Reasonable Foreseeable Development (RFP) to look forward 20 years and anticipate the likelihood of mineral development. This is always an estimate.

III. Introduction and discussion of participant recommendations regarding the South Park Master Leasing Plan

In between the first and second meetings, group members were asked to complete a homework assignment in which they filled out a framework that included Resource interests and specific locations where those interests apply, management suggestions to address those resource interests and finally data and information that informs the suggestions. The frameworks stakeholders sent in were compiled and categorized into the following:

- Air quality
- Cumulative impacts
- Noxious weeds
- Recreation
- Water – Surface, Ground
- Wilderness character
- Wildlife
- Workplace safety

During the meeting, participants **i**ntroduced their respective recommendations and the full group then discussed the interests and recommendations in detail. **Please see the attached spreadsheet for a record of those discussions.**

IV. Discussion of a next meeting

Participants discussed whether there was interest in holding a third meeting to attempt to build a consensus-based set of recommendations for the SP MLP. The group discussed the need to get the right people at the third meeting, noting that some county and industry representatives were missing at this meeting. There was discussion of alternatives for identifying consensus (e.g., using online polling). It was acknowledged that not all stakeholders may be interested in trying to work toward consensus and that full consensus may not be possible. It was discussed that consensus would not be a matter of majority vote but of identifying recommendations that could be broadly supported by the various sectors. Participants were asked to indicate whether they would definitely be interested in attending a next meeting; a majority of participants including representatives from each sector indicated interest.

There was also discussion of holding the meeting somewhere closer to the Front Range and holding it in January or February of 2015 to allow more time for preparation.

Action items:

- The Keystone Center/CUSP will provide a meeting summary of this meeting and send it out for participant review along with a scheduling poll for a February 2015 meeting
- Participants planning on attending the third meeting will refine their recommendations based on the November 10 discussions
- The Keystone Center/CUSP will develop homework assignments/joint tasks for refining ideas related to wilderness characteristics and other special areas (e.g., gold medal streams, conservation easements), water, wildlife, and cumulative impacts

Appendix A
Participant list and contact information

First	Last	Organization
Participants		
Misi	Ballard	Great Old Broads for Wilderness
Peter	Barkmann	Colorado Geologic Survey
Briggs	Cunningham	Center of Colorado Water Conservancy
Reid	DeWalt	Colorado Parks and Wildlife (CPW)
John	Duggan	Colorado Department of Public Health and Environment (CDPHE)
Bill	Dvorak	National Wildlife Federation (NWF)
Eric	Howell	Colorado Springs Utilities
Don	Kennedy	Denver Water
Aaron	Kindle	Trout Unlimited
Brian	Meinhart	Western Energy Alliance
Terry	O'Neill	Park County Advisory Board on the Environment
Suzanne	O'Neill	Colorado Wildlife Federation
Juli	Slivka	The Wilderness Society
John	Sztukowski	Wild Connections
Observers		
Jill	Abrell	Mosquito Range Heritage Initiative
Keith	Berger	Bureau of Land Management (BLM)
Ramon	Castro	Save Our South Park Water
Greg	Deranleau	Colorado Oil and Gas Conservation Commission
Kimberly	Haller	The Keystone Center
Annie	Halpin	Public
Jim	Halpin	Public
Greg	Johnson	Public
Kent	Kuster	Colorado Department of Public Health and Environment (CDPHE)
Gary	Nichols	Park County
Beth	Nielsen	Coalition for the Upper South Platte

Shelia	Pelczarski	Denver Water
Tom	Schreiner	Colorado Parks and Wildlife
Lesley	Sebol	Colorado Geological Survey
Facilitation & GIS Team		
Carrie	Adair	Coalition for the Upper South Platte
Jara	Johnson	Coalition for the Upper South Platte
Matt	Mulica	The Keystone Center
Julie	Shapiro	The Keystone Center

South Park Master Leasing Plan Stakeholder Workshops: Initial Stakeholder Management Suggestions

Stakeholder	**Interest category**	**Specific Location(s):** (be as specific as possible, or note if this is an area-wide concern)	**Resource Interests addressed by the management suggestion:** (e.g., oil and gas development, drinking water, fish and wildlife,	**Level of Priority for the specific resource interest:** (e.g., high, medium, low)	**Management Suggestions :** (e.g., closed, open, NSO, CSU, BMPs, infrastructure, phasing of leases, setbacks, timing, reclamation, etc.)	**Participant Feedback at Nov. 10 meeting** (reflects individual comments and the general discussion; does not represent consensus)
Center of Colorado Water Conservation District	Air quality	Area-wide	Air quality	Low	To minimize air pollution and hydrocarbon waste companies should be encouraged to minimize any flared gases. They should investigate using gas that would be flared to produce heat and/or electricity to be used on the site.	There may be regulations (regs) already in place. COGCC has green completions, but only in places where it's economically feasible (For info on Green Completions see slides 8-12 in https://cogcc.state.co.us/RR_Training/presentations/805_AirQuality.pdf). Producers have to be producing at an economically high level before pipelines and other infrastructure are built. Exploratory development would not usually be economically feasible enough to require additional regs. They do require flare-offs. The Air Pollution Control Division has non-attainment zones - but the only zone that is a non attainment zone (Nat'l ambient control zones) is the Front Range for ozone due to power plants and vehicles. CDPHE cannot ask the operator to do more than flaring. We may want to avoid analyzing/debating how these suggestions could be incorporated into the MLP.
Trout Unlimited	Cumulative impacts	BLM lands and minerals basin wide.	Long term oil and gas development.	High	Phased and clustered development: Leasing and development should be done in one distinct geographic area at a time. Disturbance thresholds and well densities should be established for each area and not exceeded during development operations. Further leasing and development into other geographic areas should be restricted until the reclamation/restoration process is underway and disturbance thresholds are reduced to acceptable levels. Pipelines and facilities should be centrally located and sited to minimize overall disturbance in South Park.	There could be a need to develop a map layer with all restrictions and stipulations so we can see what we are actually talking about from a landscape scale. There is a need to plan across the landscape as wildlife migrates across boundaries and development affects that migration patterns across landscape boundaries. There is a need to determine where to develop first and what reclamation needs to happen before the next area is opened up. There may be a need to gather more data on migration routes. A surface disturbance cap can be part of 'smart from the start' planning - how to plan energy development across the landscape. There's a good amount of data to develop a surface disturbance cap in South Park. The changing price and technology over time will make it difficult but is possible to include language on adaptive management. Surface development caps are different than phasing as caps address total disturbance at one point in time and is not bound to geography- this allows industry to develop where they would like from the beggining. Until there are holes in the ground it is difficult to put surface disturbance caps or phased development plans - there's a lot of unknowns. Phasing can make sense in narrow circumstances i.e. winter ranges. Adaptive management would be good but the devil is in the details such as how fast we can change and who's doing the monitoring. There are already many safeguards in place that are fairly robust. Represents the 'cumulative impacts' discussion.
Trout Unlimited	Cumulative impacts	BLM lands and minerals basin wide.	Cumulative impacts on fish and wildlife populations and overall development impacts on a landscape level. Consideration of impacts from development on neighboring public lands.	High	Conservation of migration routes and waterways that span into other field offices or adjacent public land agencies management territories. Manage to reduce overall impacts across jurisdictional boundaries. Plan to mitigate/prevent the overwhelming of nearby habitat if fish and wildlife are displaced by development activities.	

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The Wilderness Society	Cumulative impacts	South Park National Heritage Area	Visual resources, heritage resources	High	Phased development and BMPs should be put in place to preserve South Park's heritage resources.	
Great Old Broads for Wilderness	Cumulative impacts	Area Wide	Cumulative impacts on wildlife from industrialization of South Park (fragmentation of wildlife migratory & wintering ranges, noise, heavy truck traffic, lights)	High	Important wildlife areas closed to development	
Great Old Broads for Wilderness	Cumulative impacts	Area Wide	Quality of life for local residents (impacts to air, water, noise, light, road use)	High	BMP's required for all phases of development, industry responsible for infrastructure costs of quality of life mitigation efforts & other resulting externalities.	
The Wilderness Society	Cumulative impacts	Area wide	Balancing oil and gas development with conservation of natural resources and other land uses	High	A surface disturbance cap for the full MLP area should be considered to allow for development to move forward (without precise knowledge of where that development may occur) while balancing development with protection of wilderness-quality lands, important wildlife habitat, recreation opportunities, water and air resources and other values and land uses in South Park.	
Center of Colorado Water Conservation District	Noxious weeds	Area Wide	Noxious weeds	Medium	All vehicles and equipment used in all operations of drilling, collection and processing shall be cleaned at the state border to ensure they do no not contain noxious weed seeds. As long as the vehicles operate in the MLP area, they will be cleaned periodically.	The concern is that large vehicles come in from out of state and carry noxious weeds. Can we ensure that they are weed free? BLM and USFS have noxious weed control requirements. Is there an inventory completed of species present on a well pad prior to drilling, and is reclamation then inclusive of specific seed mixtures? Yes - and there is quite a bit of follow-through to determine whether it is successful. This includes site inspections. The State also has a final reclamation requirement; operator posts a deposit that is returned when site is satisfactorily reclaimed; a final inspection is required to get this done. In Garfield County, there has been a move to do interim reclamation to encourage seeds to get a foothold. There are BMPs that deal with minimized pad sizes and interim reclamation and these could be included in the MLP. State laws also have interim reclamation requirements when pad is still at full size. The State has 5 reclamation officers.

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Park County Recreation Development Office	Recreation	Multiple conservation easements held by eleven different entities (primarily land trusts). Specific locations are depicted on a composite CE map compiled by Gary Nichols.	Natural resource and open space values as defined in IRS Code §170(h) (26 USC §170). and Treasury Regulations §1.170A-14 (26 CFR 1.170A-14) for conservation easements. Resource interests include surface & ground water, wetlands, fish & wildlife, rare plant communities and recreation opportunities.	By definition, conservation easements are a high priority for perpetual resource conservation. Many easements were purchased with State and Federal funds.	Closed to oil and gas development with appropriate setbacks.	$18 million dollars has been utilized by the County and partners (CPW is the most active partner) to conserve approximately 30,000 acres of private land in South Park. This land was identified to have state or federal outstanding/significant properties and were documented as having known concentrations of important resources. These resources need to be protected. Many are in close proximity to public lands and don't hold the mineral estate. The easements are strategic to South Park - they all play a specific role in the protection of South Park and it tells a bigger story. It's centered around big game, major migration corridors, and areas near James Mark Jones. Lateral drilling is a possibility, but you have to do site specific analysis to see what is appropriate. Lateral drilling is not a silver bullet. You could have NSO and still develop. It doesn't have to be fully closed. Concerned about preserving resources in perpetuity. These are primarily surface resources but also could include groundwater and fens. There is a need to understand the potential impacts of lateral and directional drilling for these sites and also on public drinking water sites
Trout Unlimited	Recreation	BLM lands and minerals adjacent to Gold Medal streams, lakes, reservoirs.	Aquatic resources and angling opportunities, economic prosperity of Park County: These areas are critical for the Park County economy due to the sustainable recreational use for fishing and boating and critical to anglers in Park County and the Front Range – these waters serve some of the greatest number of cold water anglers in the entire western U. S.	High	NSO for at least ½ mile of these waters and/or a no drill zone extending from 11 Mile reservoir west beyond Antero reservoir and extending around all associated Gold Medal streams in the South Platte system to protect and enhance visitor experience in these areas.	The economic impact of anglers and people recreating in an area cannot be underestimated. People who come don't come to see drill pads, many people come to access the world-class recreational fishery. There is a need to think about how the recreational aspect plays into how we might develop this area. Current regs are 300 foot set back under COGCC rules. The county has a more restrictive 500 ft. ordinance. Proposal is that NSO be 1/2 mile so you don't see industrial activity. Don't know if that is the right distance, but what is the distance from industrial activity that would keep people coming back to fish? It's impossible to mitigate visual impacts at any distance, but consider mitigation measures like low profile tanks and paint schemes to make them blend in more. The recreational aspects of hunting and fishing are sustainable, are not boom and bust and have positive impact for the whole community. Gold medal stretches are different and special and there is a need to design a management scheme to ensure they will be there forever. It may be appropriate in some places to limit or prohibit development. Interest is noise, visual resource development and water quality. This also goes together with wilderness character. See what information is out there - sociological information on what distance and what degree of disturbance starts affecting experiences? BLM does some of this with outcomes-based recreation. There are differences in visual impact of different types and stages of development There are CPW studies on economic impacts - from 2008 it is $14 Million annually for South Park alone.
Center of Colorado Water Conservation District	Water - ground	Area Wide	Ground Water Quality	High	Baseline testing of water wells within a one-mile radius of single-rig drilling pad and a three-mile radius of multiple-rig drilling pad. With the testing results to be kept in confidence by testing company and water well owner.	Satisfied that this is addressed by earlier COGCC presentation. Do have the question about what if there is not a well in the area? A down gradient monitoring scenario could be helpful - that is already happening.

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Center of Colorado Water Conservation District	Water - ground	One well	Ground Water Quality	low	A test (or test program) should be done to settle the question of whether or not fluids injected at 10,000+ feet can contaminate an aquifer at less than 1000 feet.	This would be a useful experiment, but low priority. COGCC requires that a well be 'pressured up' - pressure testing before fracture stimulation to show that the well has integrity. COGCC also requires pressure monitoring once fracking begins. The question is pretty well answered from a COGGC perspective. The PSI that you are testing to depends on the formation. they test with approximately ~5000 PSI, more or less depending on the formation. In a well-developed well field there is a good sense of what it takes to fracture. In an exploratory setting you might run a higher range and then incrementally increase pressure during monitoring.
Center of Colorado Water Conservation District	Water - ground	Area Wide	Ground Water Quality	Low	A 99.9% level of Seismic resistance for casing rupture should be established. A seismic net able to detect earthquakes at the 99.9 % level at an active well bore should be emplaced. If 99.9% quake should occur at a bore site, drilling should be stopped and the casing inspected or tested for any failure.	We should be able to answer the question , 'what about earthquakes'? There was a concern about wastewater injection is causing earthquakes. Can a setback to faults address this? What are we going to do with produced and flow back water? this should be addressed in the MLP. COGCC has ways to deal with this. Federal government has delegated the state of CO to administer underground injection control program. COGCC reviews every permit for injection whether waste control or recovery. COGCC does a number of reviews for these permits. There was earthquake(s) in Weld County associated with injection of wastewater. Operator was operating outside of permit conditions and was fined. Now they are operating within permit conditions and there are no further problems occuring. There are not setback for injections. Have to have surface facilities set back from the water bodies. COGCC has denied permits where separation of target formation and other usable
Center of Colorado Water Conservation District	Water - ground	Area Wide	Ground Water Quality	Low	Seismic detectors to be installed in the counties where fracking or deep-well injection of used fracking water or contaminants is to be done. When seismic movements or temblors are detected fracking and injection operations will cease until such time as it can be shown that those operations are not caused by the seismic activity. In addition, all drilling, fracking, and injection wells will have their well casings inspected, by an independent authority, to insure that the integrity of their casings have not been compromised by the seismic activity.	There have only been 2 earthquakes recorded in Park County. These were detected by monitors in Teller County. No seismic monitoring currently in Park County.
Center of Colorado Water Conservation District	Water - ground	Area Wide	Ground Water Quality	High	No drilling within some (500 – 1300 ft. setbacks) distance from a water well.	The specific number of feet for setbacks should be determined by experts. Need to figure out what the correct setback is, possibly by utlizing a test well and tracer chemicals.
Trout Unlimited	Water - ground	BLM lands and minerals basin wide.	Groundwater resources	High. Water quality and quantity are perhaps the largest issue within the MLP process.	Groundwater monitoring at all well sites.	Ground water testing at up to four wells around the extracion well occurs pre-drilling and then after 6 months and after that, every three months for 72 months. Why the 3 month interval? More intensive monitoring occurs in the immediate-term to see if movement is catastrophic. Near term monitoring looking at something that would be pretty catastrophic if it moved in 3 months. But water doesn't move that fast in deep aquifers. Groundwater flow tends to be very slow unless you induce a high pressure gradient. If you don't have wells around, you're not required to monitor. Could require within the MLP that there be groundwater monitoring even if there are no drinking wells around. Water wells are not that cost prohibitive. If it's feasible, put the wells in. Consider adding uranium or radioactive monitoring in groundwater monitoring in South Park.

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Center of Colorado Water Conservation District	Water- ground	Area Wide	Ground Water Quality	High	Drilling company to provide equipment, training and qualification of hazardous materials (hazmat) teams as part of the fire or sheriff's departments in the counties prior to drilling production wells in those counties. There will be at least one hazmat team per 1000 square miles of county surface area or fraction thereof, with a minimum of one per county in addition to the hazmat teams the drilling company may have on staff. Thus Park County within 2100 square miles of surface area would get three hazmat teams.	Ensure workers who operate at drill sites know what they are doing and that response teams know what to do if a spill occurs- if this isn't already a reg. (HAZMAT)
Denver Water	Water - ground	The area surrounding Antero Reservoir	• Dam Safety • Drinking water • Water Quality • Groundwater • Water Quantity • Resource Category 1 Fen/Mire • Fish and wildlife • Recreation	High	• NSO Setbacks 500-1,000 feet from reservoir maximum water level • BMPs (see attached) • Phasing of oil drilling leases • Minimize permanent roads • Centralize stations only if least damaging alternative • Reclamation of sites back to the native vegetation and habitat	Some of these regs are already under 317B - but don't apply to ground water. see info at: https://cogcc.state.co.us/RR_Training/presentations/317B_SurfaceWaterProtection.pdf There are a lot of wetlands around South Park with shallow ground water resources. In the regulatory framework now, are there extra protections for special resources like fens? e.g., special setbacks for fens or designated critical wetland habitat or for reservoirs? If there is a contamination of shallow ground water associated with reservoirs, that water could go any direction, upstream or downstream and we need to understand that more fully. 500-1000 foot setbacks from maximum water level in reservoir - range is for discussion. Do we have studies that show the influence of shallow ground water on reservoirs? Typically we don't see in a lot of models showing groundwater discharging to surface water bodies; sometimes see the opposite of this. Are there setbacks for specific water bodies through COGCC? No, but the South Park Land Use Amendment did include some setbacks for fens. Do also have some setbacks for riparian and wetland vegetation. What about special plants - if it is T&E then the operator has to comply with the Endangered Species Act. Can BLM incorporate these setbacks in an MLP process that are not codified in federal, state or county regulation? YES. The ones that apply to the land use plan will get developed and codified through the NEPA process. It will eb hard to inclorporate rules in the MLP that is going to be specific enough to proteect every water body. There may be a need to include the minimum standards in the MLP and then utilze tiers that are more restrictive based on the specifc waterbody and on-the-groud situation.
Denver Water	Water - ground	The area surrounding Eleven Mile Canyon Reservoir	• Dam Safety • Drinking water • Water Quality • Groundwater • Water Quantity • Resource Category 1 Fen/Mire if present • Fish and wildlife • Recreation	High	• NSO Setbacks 500-1,000 feet from reservoir maximum water level • BMPs (see attached) • Phasing of oil drilling leases • Minimize permanent roads • Centralize stations only if least damaging alternative • Reclamation of sites back to the native vegetation and habitat	

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Denver Water	Water - ground	Four-Mile Creek Ranch	• Resource Category 1 Fen/Mire • Groundwater • Water quality • Water quantity • Fish and wildlife	High	• NSO Setbacks 500-1,000 feet from Denver Water property boundary • BMPs (see attached) • Phasing of oil drilling leases • Minimize roads • Centralize stations only if least damaging alternative • Reclamation of sites back to the native vegetation and habitat • BLM can have setbacks based on special resource area considerations – can these setbacks be based on property boundary? • Wetland bank is regulated through the Corps of Engineers	
Great Old Broads for Wilderness	Water - ground	Area Wide	Ground water	High	No development until South Park geology/hydrology is scientifically studied & appropriate protections are required according to what is learned.	Would it be feasible to require a basic ground water study for all oil and gas lease in the MLP (i.e. Groundwater flow regimes, etc.) Leave specifics open and flexible as sites would be different, but require a groundwater assessment in the MLP. COGCC is already using existing groundwater data in their APD process. Kind of wide open, have 4 monitoring points but what is it going to address? Is one going to monitor just water flows and/or quality or are you asking for info on the way water moves. Rather than emphasizing studying ground water the BLM focuses on protecting it. But are there ways to get to the bigger concerns. Well construction under COGCC standards should address this. Where is the appropriate balance?
Center of Colorado Water Conservation District	Water - ground/soil protection	Area Wide	Soil protection	High	All drill pad sites shall be fully lined with the lining protected by at least one-foot of suitable cover that will not allow penetrations, tears or degradation of the liner. Any ponds for drilling mud, fracking fluids, used fracking fluids or water contaminated by petroleum products, benzene or coal-based liquids or solids shall be have their own liners or and above the site liner.	COGCC construction standards currently address this.
Center of Colorado Water Conservation District	Water - quantity	Area Wide	Water usage	Low	To minimize hazardous waste and water injection disposal companies should be encouraged to clean up all water coming out of a well so that it can be re-used for fracking or even be used for industrial or agricultural purposes.	If it is possible, it will be done because water is expensive. *Significant quantities of water are another concern - getting them through purchasing or leasing water rights or transferring from other places.

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CDPHE	Water -ground and surface	Areas Wide Sensitive Drinking Water Protection Areas for Public Water Systems (SW intake locations, gw wells, gui wells, water supply reservoirs, key diversions/conveyance structures, public water system infrastructure)	Drinking Water with an implied water quality benefit to aquatic life habitat, recreation, sensitive riparian areas, etc.	High	SW supplies (including intakes, water supply reservoirs, second, third, and fourth order water supply conveyance streams) For 5 stream miles above diversions/reservoirs/intakes/public water system infrastructure? 300' Internal Zone (NSO) 301' – 500' Intermediate Enhanced BMP's (317B regulations + modified BMP's) 501'-1/2 mile External Buffer (317B Regulations) GUI sources (public DW wells designated as under the influence of surface water) 500' Internal Zone (NSO) 500' Internal Zone (NSO) 501' -1/2 mile Intermediate Zone (Enhanced BMP's + GW sampling as Brighton's COGCC order) GW sources (public DW wells <300 depth and/or depth to water <150') 500' Internal Zone (NSO) 501' -1/2 mile Intermediate Zone (Enhanced BMP's + GW sampling as Brighton's COGCC order) Public water system closed pipelines 300' Internal Zone (NSO) Source Water Protection Plan Areas Where PWS have developed protection plans (with a stakeholder process involving industry) individual PWS local concerns (ex: emergency response, etc.) for should be addressed in the lease stipulations.	There isn't a 'magic' answer for setbacks. Surface water: focus on gaps between existing protections and where we don't have protections. 317b applies to surface water intakes only. There are no protections upstream from a drinking water supply reservoir. The recommended protections 5 miles upstream - circles back to a state statute that was initially applied to surface water intakes and using this could make sense to protect reservoirs. Zones are tied to existing regs and discussions (300 feet NSO; 300-500 foot enhanced BMPs. Example - pitless drilling, additional containment of hazardous materials, closed loop systems). Similar tiers for Ground Water Influence zone and Ground Water sources. This includes perennial streams - not ephemeral streams. Ephemeral streams don't flow consistently. Doesn't include class 1 but does include classes 2, 3, 4. Any restriction will have a cost associated with it. If developers don't have anywhere else to go, then they get pinched so you don't have any options. Almost every stream segment in upper south plate is designated as water supply, but CDPHE proposal is specifically about upstream sources from specific water reservoirs. Suggestion: Take a visual - complete a GIS exercise to show what this would look like with an example of Antero, etc. CUSP could do this kind of exercise and show it at the next meeting.
Colorado Wildlife Federation/National Wildlife Federation	Water - surface	Streams, fens, wetlands, playas, springs on BLM lands	Fisheries, waterfowl, game, other wildlife; recreation	High	Setbacks; no open pits, tanks , ponds; re surface water and fish habitat: close loop systems	
Colorado Springs Utilities	Water - surface	Area of interest will be Montgomery Reservoir and the Homestake and Blue River pipeline corridors as identified with the attached map.	1) Public water supply operations and infrastructure 2) Development of future and or reconstruction of existing water supply infrastructure 3) Development of potential water supply storage options	High	With consideration to CSU's Blue River pipeline, and partnership with Aurora Water respective to the Homestake pipeline, CSU is most interested in the protection of water quality, supply, operation and maintenance of existing infrastructure, and potential future storage alternatives in the South Park area. We see the need to further identify and understand BMPs that will best protect these areas of interest, especially in proximity to pipelines. We see setbacks as an option but further analysis and understanding of lateral drilling beneath high pressure pipelines is needed. Consideration to restricting lateral drilling underneath major public water supply pipelines may need to be considered pending the depths of drilling and geology. Note, many sections of where these pipelines are located are under the authorization of Special Use Permits with the USFS and BLM and will need to be reviewed for any conflicts of use and mineral/gas operations and extraction. CSU recognizes the benefits of watershed health as a means to sustainable public water supplies, and understands other operations and energy opportunities can work if there is good coordination and collaboration to protect all parties interest.	Colorado Springs Utilities will want to be as coordinated as they can with Denver Water, etc. on setbacks...don't have groundwater and surface water collections in South Park,.. But may have them in the future… but do have 2 major pipelines in the South Park area. Pipelines 40 feet buried. Setback (500 foot) from pipeline. Right of ways - special use permit.

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Trout Unlimited	Wilderness character	BLM lands and minerals in and around the James Mark Jones State Wildlife Area. Any other BLM lands that exhibit wilderness characteristics should also be included.	This area is known for its primitive backcountry character, pristine condition and intact wildlife habitat. Singling out this are for an NSO or a no drilling area will be a priority.	High. Conservation of this area is one of the top priorities of sportsmen and wildlife interests	NSO or no drilling on the BLM lands and minerals that reside in the core backcountry area in and around James Mark Jones. Prioritize management to conserve and protect backcountry character and wildlife habitat.	James Mark Jones (JMJ) is a large area that is important for big game as well as recreation. It has documented T&E species, has been proposed as a backcountry recreational area and has the largest plover habitat in the area. It is similar to a gold water fishery and should get special consideration. Wild Connections has documented the info showing how important this area is to big game (they have provided the GIS layer for the "LWC (4,700 acres)"). Because there are so many overlapping values, it is logical to propose NSO, The suggestions for JMJ should tie in with how CPW is managing the area.
The Wilderness Society	Wilderness character	Reinecker Ridge	Lands with wilderness characteristics, recreation, wildlife	High	Closed to leasing, or NSO without exception, modification or waiver	
Wild Connections	Wilderness character	Reinecker Ridge proposed Lands with Wilderness character (LWC)	Lands with Wilderness Characteristics, wildlife, recreation	High	Closed to leasing, or NSO without exception, modification, or waiver	
Trout Unlimited	Wildlife	BLM lands and minerals in the southeastern corner of Park County near Guffey (Thirtyone Mile Mountain, Hammond peak, Baldy Mountain).	This area provides a good deal of winter range for big game (elk, mule deer, pronghorn) and is a key migration corridor from the high summer range to the west.	High. This area is one of the key big game areas in all of South Park. It makes sense to include it due those critical values.	This area is not currently within the proposed MLP boundary. Trout Unlimited proposes that this area be included and that the appropriate management scheme be identified and implemented.	Currently this area is out of the MLP area, there is quite a bit of BLM land and federal minerals. This is a large area for big game winter range and migration area. This is a high value area than the typical South Park basin. Should we expand the MLP area? This crosses two CPW regions as well as two counties.
Colorado Wildlife Federation/National Wildlife Federation	Wildlife	BLM lands in proximity to the James Mark Jones State Wildlife Area (JMJ SWA); migration corridor; Red Hill	Wildlife (elk winter concentration areas, migration, etc.; mule deer winter concentration, severe winter range) , oil and gas potential, recreation; bighorn sheep winter range – Red Hill/285	High	Closed/NSO in specific areas; in other areas within this description BMPs, phased leases, unitization to reduce footprint, timing, reclamation, etc.	CWF and partners went through all the different wildlife layers and determined areas where they overlapped. COGCC and CPW need to be in good communication regarding House Bill 1298 (HB). HB 1298 does not have NSO; it has RSO (Restricted Surface Occupancy). The restrictions are significant enought that many companies will avoid these areas. Plover is not currently in the COGCC wildlife layers. NSO may be too much and, per a participant comment, BLM is required per policy to use the least restrictive stipulation to address the issue. Because plover was not included in HB1298 it won't trigger consultation between COGCC and CPW if that is the only species, but if it overlaps with elk habitat it would trigger the consultation under the HB. Some of these areas are proposed because there is no substitution but timing stipulations might be ok (specifically calving and winter range etc.). During the "on" season with timing limitations drilling can be more intensive and potentially more impactive. A participant noted that these migration areas extend through the BLM area and do cover other lands.
Colorado Wildlife Federation/National Wildlife Federation	Wildlife	BLM land west + NW of Antero Res. at 285; Fourmile	Elk winter concentration area, severe winter range, migration; mule deer winter concentration, severe winter range	High	Closed/NSO in specific subareas; in other areas within this description BMPs, phased leases, unitization to reduce footprint, timing, reclamation, etc.	
Colorado Wildlife Federation/National Wildlife Federation	Wildlife	BLM lands east of Hwy 9 and South of Hwy 24; and area extending NW to BLM lands in proximity east of JMJ SWA	Wildlife (pronghorn winter concentration and migration), oil and gas potential	High	Closed/NSO in specific areas; in other areas within this description BMPs, phased leases, unitization to reduce footprint, timing, reclamation, etc.	

Stakeholder	**Interest category**	**Specific Location(s):** (be as specific as possible, or note if this is an area-wide concern)	**Resource Interests addressed by the management suggestion:** (e.g., oil and gas development, drinking water, fish and wildlife,	**Level of Priority for the specific resource interest:** (e.g., high, medium, low)	**Management Suggestions :** (e.g., closed, open, NSO, CSU, BMPs, infrastructure, phasing of leases, setbacks, timing, reclamation, etc.)	**Participant Feedback at Nov. 10 meeting** (reflects individual comments and the general discussion; does not represent consensus)
Colorado Wildlife Federation/National Wildlife Federation	Wildlife	BLM lands east of Badger Creek and State Land Board lands	Elk winter concentration area and elk production area, migration	High	Closed/NSO in specific areas; in other areas within this description BMPs, phased leases, unitization to reduce footprint, timing, reclamation, etc.	
Colorado Wildlife Federation/National Wildlife Federation	Wildlife	BLM lands at south edge of MLP draft boundary	Elk winter concentration area and elk production area, migration	High	Closed/NSO in specific areas; in other areas within this description BMPs, phased leases, unitization to reduce footprint, timing, reclamation, etc.	
Colorado Wildlife Federation/National Wildlife Federation/Great Old Broads for Wilderness	Wildlife	MLP-wide- upland nesting sites	Mountain plover nesting sites (uplands)	High	NSO in nesting areas or timing restrictions	
Center of Colorado Water Conservation District	Work place safety	Area Wide	Work place safety	Medium	All drill pads, fracking sites, and vehicles used to transport material that could cause contamination of land or water, shall be free from the use of drugs and alcohol, even legal ones, that may impair the ability of individuals to maintain the integrity of the site and the health and safety of the areas surrounding the drilling or production site or the roadways over which hazardous materials may be transported	There is no known driller that doesn't do drug testing. This is also regulated by OSHA and MSHA so no need for more regulation here.

South Park Master Leasing Plan (MLP) Stakeholder Workshop
Meeting 3: February 24, 2015
10 AM to 3:30 PM

Shawnee Community Center
57 CR 64, Shawnee, CO 80475

Meeting Summary
Prepared by The Keystone Center

Participants: See Appendix A.

Purpose of Workshops: The South Park Master Leasing Plan (MLP) Stakeholder Workshops bring together invited stakeholders in discussion of data, facts, perspectives, and management suggestions related to the South Park MLP under development by the Bureau of Land Management (BLM). The master leasing plan that is being developed for South Park will establish a guiding framework and vision for future oil and gas leasing and development on federal public lands managed by the BLM. Key issues identifying and addressing resources conflicts, objectives for resource conditions, and resource protections.

The workshops will engage public and private sector stakeholders including interests related to but not limited to: oil and gas development, wildlife/habitat conservation, water, homeowners, cattlemen and other agriculture interests, land management, and recreation interests. These meetings are independently convened by the Coalition for the Upper South Platte and The Keystone Center and are not a part of the formal BLM process.

South Park Master Leasing Plan Stakeholder Workshop Goals:

1. Engage the public and stakeholders in a formal and open process to learn about and provide feedback on the South Park Master Leasing Plan
2. Build relationships, trust, and understanding across diverse public and stakeholders
3. Build knowledge of and access to a common set of data and facts upon which Master Leasing Plan decisions would be made
4. To the extent possible, develop and propose to the Bureau of Land Management (BLM) a community-driven set of recommendations regarding the South Park Master Leasing Plan
5. Through discussions related to the South Park Master Leasing Plan, create awareness of stakeholder interests and perspectives that may inform leasing decisions on other lands

Meetings will culminate in synthesizing and sharing the range of interests and recommendations identified through discussions (e.g., in the form of a report available to participating stakeholders and the public that reflects the outcomes of discussion). The exact nature and content of such a deliverable will be directed by the participating stakeholders based on the discussions in the meetings. It may include a description of interests, areas of concern, data (e.g., mapping layers), and facts, and management recommendations (e.g., common ground recommendations and/or the range of recommendations identified by the stakeholders).

February 24, 2015 Workshop Outcomes: At the February 24, 2015 meeting, participants…

- Discussed refined stakeholder recommendations regarding the South Park Master Leasing Plan and establish level of support.

Overview of Discussion: Julie Shapiro of The Keystone Center opened the meeting by reviewing the objectives and meeting outputs, including information regarding the final report. Keith Berger, BLM representative, reviewed the timeline for the Notice of Intent for the South Park MLP; it is anticipated to be announced in the Federal Register in June 2015. Participants presented and discussed the refined proposals for the South Park MLP; proposals addressed topics of wilderness character, wildlife, water, and closed loop systems. Facilitators reviewed the timeline for evaluation of the final draft report and participants discussed key themes and take-aways from the process. *The stakeholder input proposals well as themes from discussion will be summarized in a final report on the process and are not detailed in this meeting summary.*

Outcomes and Action Items: The Keystone Center will draft a final report of the workshops inclusive of the stakeholder proposals as well as overarching themes of discussion. Participants will have the opportunity to review and provide comments on the draft prior to finalization.

Appendix A – Participant List, South Park MLP Stakeholder Workshop, February 24, 2015

Participants		**Organization**
First	**Last**	
Misi	Ballard	Great Old Broads for Wilderness
Peter	Barkmann	Colorado Geologic Survey
Keith	Berger	Bureau of Land Management (BLM)
Meghan	Cornwall	National Wildlife Federation (NWF)
Briggs	Cunningham	Center of Colorado Water Conservancy
Reid	DeWalt	Colorado Parks and Wildlife (CPW)
John	Duggan	Colorado Department of Public Health and Environment (CDPHE)
Tom	Eisenman	Park County
Andrew	Glenn	Western Energy Alliance
Dave	Harvey	Colorado Cattlemen's Association
James	Ingalls	Diamond T Services, Bar Star Energy LLC, Bar Star Land LLC
Peter	Ismert	US EPA
Lynda	James	Upper South Platte Water Conservancy District
Don	Kennedy	Denver Water
Aaron	Kindle	Trout Unlimited
Suzanne	O'Neill	Colorado Wildlife Federation
Terry	O'Neill	Park County Advisory Board on the Environment
Juli	Slivka	The Wilderness Society
John	Sztukowski	Wild Connections
Amy	Titterington	US Forest Service
Richard	Vidmar	Aurora Water
Facilitation & GIS Team		
Kim	Haller	The Keystone Center
Jara	Johnson	Coalition for the Upper South Platte
Matt	Mulica	The Keystone Center
Julie	Shapiro	The Keystone Center
Observers		
Peter	Binney	Representing National Wildlife Federation
David	Fronczak	US EPA
Tom	Schreiner	Colorado Parks and Wildlife