2024 Annual Report

Range-wide Oil and Gas Candidate Conservation Agreement with Assurances (CCAA) for the Lesser Prairie-Chicken

Permit #TE27289B-0
(2014-2044)


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Submitted to the
U.S. Fish and Wildlife Service
on March 31, 2025
by the
Western Association of Fish and Wildlife Agencies
&
WAFWA Species Restoration Fund

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The Range-Wide Oil and Gas Candidate Conservation Agreement with Assurances for the Lesser Prairie-Chicken (LPC) in Colorado, Kansas, New Mexico, Oklahoma, and Texas (CCAA) is a voluntary conservation strategy that establishes a mitigation framework which is administered by the Western Association of Fish and Wildlife Agencies (WAFWA) and permitted by the U.S. Fish and Wildlife Service (Service). Established in 2014, the CCAA is a partnership between the states of New Mexico, Colorado, Kansas, Oklahoma and Texas, the oil and gas industry and private landowners. The CCAA is available on WAFWA's website (https://wafwa.org/initiative-programs/lesser-prairie-chicken/).

RECOMMENDED CITATION

WAFWA, 2025. The 2024 Annual Report for the Range-wide Oil and Gas Candidate Conservation Agreement with Assurances for the Lesser Prairie-Chicken. Western Association of Fish and Wildlife Agencies. Boise, Idaho.

Contents

EXECUTIVE SUMMARY

5.7 million
Acres
Enrolled

Industry participants commit to implementing the CCAA conservation strategies for all oil and gas related projects on enrolled lands.

CONSERVATION STRATEGY

Avoided Impacts
27,142
Habitat Acres

High Quality Habitat
75%
Avoidance Rate

Remediated
79
Habitat Acres

Mitigated
19,448
Habitat Acres

I. Avoid Habitat Impacts

Projects exhibited an impressive 58% collocation rate with existing infrastructure to avoid new impacts to habitat.

II. Minimize Impacts to High-Quality Habitat

When avoidance is not possible, projects are strategically located in low-quality habitat to minimize the effect of new impacts.

III. Remediate Habitat Impacts

Participants may elect to restore previously impacted habitat to generate remediation credits to offset new impacts.

IV. Mitigate Habitat Impacts

Remaining impacts are mitigated (offset) by the CCAA's conservation efforts at a 2:1 ratio to ensure a conservation benefit.

Biologically based

MITIGATION FRAMEWORK

Uniquely addresses impacts to habitat quality & quantity

2:1
Mitigation
Ratio

Voluntary

CONSERVATION BENEFITS

Provides conservation beyond the requirements of the permit

Restored
10,299
Habitat Acres

MITIGATED IMPACTS

19,448 Habitat Acres Impacted
(cumulative since the start of the program in 2014)

Habitat Quality = LOW
Habitat Quality Score: 0.35 (range 0.0-1.0)
with a stable trend of habitat quality

Majority (75%) of impacts occur in low quality habitat (CHAT 3-4)

Percentage of leks observed within 1.25 miles: 4%
(64% of the habitat was surveyed)

CONSERVATION OFFSET

49,925 Habitat Acres Conserved
(provided in 2024)

Habitat Quality = HIGH
Habitat Quality Score: 0.71 (range 0.0-1.0)
with a trend of increased habitat quality

Majority (98%) of conservation occurs in high quality habitat (CHAT 1-2)

Percentage of leks observed within 1.25 miles: 85%
(90% of the habitat was surveyed)

12,500 Debit Units — Credits Exceed Debits *by 71%* — **42,575 Credit Units**

Conservation Efforts are Greater than Impacts

INTRODUCTION AND BACKGROUND

Entities and Business Structure

The Western Association of Fish and Wildlife Agencies (WAFWA) is a 501(c)4 nonprofit organization representing the state and provincial fish and wildlife agencies from 24 states and Canadian provinces, an area covering nearly 3.7 million square miles of western North America. WAFWA holds the Federal Fish and Wildlife permit (# TE27289B-0) issued by the U.S. Fish and Wildlife Service (Service) on 02/28/2014 for the Range-Wide Oil and Gas Candidate Conservation Agreement with Assurances for the Lesser Prairie-Chicken in Colorado, Kansas, New Mexico, Oklahoma, and Texas (CCAA). WAFWA is the CCAA program administrator with responsibility to ensure activities under the CCAA are in-compliance with the terms and conditions of this 30-year permit and that operations are conducted following the CCAA Business Plan (WAFWA, 2021).

The Species Restoration Foundation (SRF) is a 501(c)4 nonprofit organization created by WAFWA solely to manage the financial operations of the CCAA. WAFWA and SRF share a principal interest in the success and governance of the CCAA by having a mutual Executive Board of Directors. The board is composed of the directors of each member agency and is the ultimate decision maker for the CCAA.

The LPC Initiative Council (LPCIC) is the governing body of the CCAA, comprised of the directors, or their designee, of the five-state fish and wildlife agencies within the LPC range, to provide support and oversight of the CCAA's administration. The LPCIC is informed by advisory committees providing a mix of expertise and experience. The LPC Program Director oversees the day-to-day operations.

Annual Report

WAFWA provides the Service with an annual report regarding the implementation of the CCAA by March 31st of each year. Provided in this report are the key findings for the reporting period of January 1, 2024, to December 31, 2024.

Financial Audit

The SRF financial operations are audited annually through an independent third-party accounting firm according to Government Auditing Standards. Since the organization was created in 2014, there have been no material findings identified in any financial audit. The 2023-2024 financial audit and accompanying IRS form 990, provides findings that the CCAA is financially sustainable at its current rate of use. The audit results and accompanying IRS form 990 are publicly disclosed and available on WAFWA's website (www.wafwa.org/about-us/).

Third-party Annual Programmatic Review

An independent third-party consultant annually reviews the WAFWA/SRF program operations to evaluate conservation performance and compliance with the terms of the CCAA. This process supports a predictable feedback loop for continued adaptive management and improvement. The 2024 programmatic review provides findings that the annual report herein fairly reflects the expenditures and conservation achievements of the program and has passed all compliance points of the CCAA (Dillon, 2025). The review is publicly disclosed and available on WAFWA's website (https://wafwa.org/initiative-programs/lesser-prairie-chicken/).

What's New in 2024

- 10-Year Review (2014-2024)

  Under the CCAA's adaptive management principles (Section XV, CCAA), a ten-year review was conducted by WAFWA in 2024, to identify needed changes to the conservation strategy. The CCAA provides provisions for allowable changes and provides a process for identifying when changes may be warranted. The findings did not support corrective actions under the 'changed circumstance' limitations of the CCAA (Section XVI, CCAA).

What's New in 2024 (continued)

- Maximum Allowable Use Cap

Through strategic discussions between the Service, Industry Participants, and WAFWA/SRF regarding the sustainable use of the CAAA over time, an in-depth review of the program's existing use restrictions was conducted by WAFWA that resulted in a collaborative decision to establish a new use restriction.

In 2024, WAFWA/SRF voluntarily established a Maximum Allowable Use Cap, to ensure that a sudden surge in industry use of the CCAA (i.e., request for mitigation/offset units) would not overextend the CCAA's financial investments or diminish the long-term sustainability of the permit. Specifically, the maximum use of the CCAA by industry Participants will not exceed the cap established by WAFWA/SRF. The cap was established by WAFWA/SRF under a five-year programmatic review process, balancing the forecasted need for conservation offset units with a financial review of investment performance; to ensure that the trending long-term forecast of funding will be sufficient in meeting CCAA obligations.

To help communicate long-term assurances that investments are held sustainably to support conservation delivery, WAFWA/SRF established the Sustainable Investment Standard. Which is, the required base investment needed for the non-wasting endowment to ensure that the long-term return on the investment can support the annual CCAA expenditures, formulated below. The resulting Maximum Allowable Use Cap, as defined by the Sustainable Investment Standard, will be annually reported on in the Financial Summary of the annual report.

(((Conservation Cost x 20% Safety Net) x Endowment Multiplier of 20)
x 1-Yr. Conservation Reserve) + Administrative Fund Reserve

Overview of the CCAA's Use Restrictions

The new cap compliments the CCAA's existing policy on use limitations, as a comprehensive strategy to ensure the investments are maintained and function as intended throughout the 30-year permit duration.

1) Limit by Incidental Take Restrictions

The Service's permit authorizes incidental take, defined as an acreage limit that may be impacted by covered activities. This is a hard limit to the use of the CCAA, tracked in the Incidental Take section of this report.

2) Limit by Land Enrollment

Under the terms of the CCAA, Participants may only submit mitigation impact projects on enrolled lands. The period to enroll land is closed effective with the final ESA listing rule. Considering no additional land may be entered into the CCAA, this provides a hard limit to the use of the program. See the Enrollment section.

3) Limit by FACZ Thresholds

The CCAA restricts development in high quality habitat areas, referred to as FACZ's. Within each predefined FACZ reporting unit, thresholds are set on the maximum amount of development-related impact that may occur from any source (not just the CCAA's covered activities). This provides a hard limit to the use of the program.

4) Limit by Credit Availability

Participants may only utilize credits that are available at the time of mitigating an activity. WAFWA's obligations are to ensure the availability of necessary credits, and WAFWA has fulfilled this requirement since the start of the program. However, if industry Participants exceeds their stated forecasted need, and WAFWA is not able to secure additional offset units, this use cap is in effect until additional credits can be secured.

ENROLLMENT

Industry participation[1] remains high with 123 oil & gas companies committed to implementation of the CCAA's conservation strategy of avoiding, minimizing and mitigating impacts within the CCAA's covered area[2]. See Appendix D for a listing of participants. Under the terms of the CCAA, new participant enrollment is not authorized as of the LPC's effective Endangered Species Act (ESA) listing date of March 27, 2023. However, the CCAA does ensure that ownership interest can be transferred after the listing decision.

Enrollment Changes in 2024:

- Decrease of four Participants, resultant from three voluntary terminations due to company merger/sale to a company that holds no interests in the CCAA covered area, and one company stated to be out of business.
- There was a net reduction of 27,422 enrolled land acres resulting from the above-mentioned terminations.
- No Participants were suspended or terminated due to compliance issues.

Enrolled Property (Privately Owned Lands)

The CCAA provides several enrollment options for industry Participants to address their operational needs. Participants could enroll defined parcels of private lands on a per acre fee basis (Land Enrollment) or pay a one-time fee for oil and gas related linear infrastructure such as pipelines, roads, or utility lines (Linear Enrollment). The land enrollment option commits Participants to submitting all oil and gas development projects on the Enrolled Property for the duration of the agreement. The linear enrollment option is restricted to the coverage option elected (i.e., the pipeline flat-fee enrollment option only allows coverage for pipelines and their directly associated infrastructure) but projects may be submitted anywhere within the CCAA covered area.

In 2024, the CCAA acreage enrollment totaled 5.7 million acres of industry-leased or controlled private lands. This demonstrates industry's commitment to the program by voluntarily, contractual agreement to ensure that any oil & gas related projects, which occur on enrolled lands, will be mitigated through the CCAA.

Industry's Commitment
Avoid, Minimize & Mitigate Impacts on *5.7 million* Acres

Table 1. Industry Acreage Enrollment

Ecoregion	Land Enrollment	Enrolled Buried Pipeline*	Enrolled Utility Lines*	Total Acres Enrolled	% Enrollment per Ecoregion
Mixed Grass Prairie	2,300,170	364,574	28	2,664,773	47%
Sand Sagebrush Prairie	1,857,866	99,742	0	1,957,608	34%
Shinnery Oak Prairie	576,568	185,121	0	761,689	13%
Shortgrass Prairie	279,702	36,609	0	316,311	6%
Total:	**5,014,306**	**686,046**	**28**	**5,700,380**	**100%**

*Pipeline/Utility enrollments are buffered by the CCAA's impact buffer distances to obtain acreage.

[1] Industry Participants - Industry companies with oil and gas related activities that have an executed CCAA Certificate of Inclusion (CI).
[2] CCAA Covered Area - Defined as the 2013 Estimated Occupied Range of the LPC plus a 10-mile buffer (EOR+10).

CONSERVATION STRATEGY

The CCAA conservation strategy provides incentives for industry Participants to avoid and minimize impacts to LPC while providing assurances regarding the effect, if any, that listing would have on their operations. The incentive promotes: I] avoidance of new oil and gas developments within potential habitat areas; II] minimization of new oil and gas developments in high-quality LPC habitat; and III] implementation of a biologically based framework to condition and mitigate impacts resulting from new oil and gas developments when avoidance is not possible.

I. Avoid Habitat Impacts (discretionary)
II. Minimize Impacts to High-Quality Habitat (discretionary)
III. Remediate Habitat Impacts (discretionary)
IV. Mitigate Habitat Impacts (required)

I. Avoid Habitat Impact (Voluntary)

The primary avoidance strategy of the CCAA is to promote the location of new oil and gas developments (projects) within areas already impacted by development, referred to as collocation. When not collocated, new developments have been determined under the CCAA to have some level of impact to the LPC by habitat loss/fragmentation or by noise and physical disturbance. Therefore, promotion of collocation (avoidance of impacts) is an essential component to the mitigation framework. As such, the conservation strategy incentives collocation by not requiring mitigation (no fees to industry) for developing new projects in areas already impacted by infrastructure or development.

In 2024, Participant's demonstrated their voluntary commitment to avoidance by having a 53% collocation rate. Meaning, over half of the new oil and gas projects had no impact on the species. This avoided, what could otherwise have been, habitat degradation or loss of 992 acres (Table 2). Since the start of the program, the collocation rate has been 58% which avoided impacts on 27,142 acres (Table 2). This demonstrates industry's commitment to implementing discretionary conservation and the effectiveness of the CCAA's incentivization strategy.

Table 2. Avoidance of Habitat Impacts by Collocation

Ecoregion	Potential Impact Acres[3]	Impact Acres[4]	Collocation Rate	Habitat Acres Avoided
2024				
Mixed Grass Prairie	1,468	778	47%	690
Sand Sagebrush Prairie	279	93	67%	187
Shinnery Oak Prairie	124	8	94%	116
Shortgrass Prairie	0	0	--	--
Total:	**1,871**	**879**	**53%**	**992**
2014-2024				
Mixed Grass Prairie	19,775	11,262	43%	8,512
Sand Sagebrush Prairie	8,272	3,791	54%	4,481
Shinnery Oak Prairie	15,097	2,048	86%	13,049
Shortgrass Prairie	3,446	2,347	32%	1,099
Total:	**46,590**	**19,448**	**58%**	**27,142**

Note: Table includes impacts that were remediated (Section III) and mitigated (Section IV).

Voluntary Conservation
Impacts Avoided on
27,142
Habitat Acres

Every collocated project is considered a conservation success!

[3] Potential Impact Acres - Includes the footprint of the project (direct effect) plus a defined buffer within which LPC habitat is deemed to be impacted because of the project (indirect effect). Buffer distances vary depending upon the activity, refer to the CCAA.

[4] Impact Acres - A review is conducted of the Potential Impact Acres to identify areas that have not already been impacted by developments.

II. Minimize Impacts to High-Quality Habitat (Voluntary)

When habitat avoidance is not possible, industry Participants utilize the WAFWA provided tools and assistance to avoid high-quality LPC habitat areas, whenever possible, as a way to minimize the impacts. The conservation strategy incentives minimization by design of a fee structure that charges higher costs for high-quality habitat.

II(a). By Strategic Location

Under the CCAA, high-quality habitat is defined as the geographic areas of greatest conservation value to the LPC; defined in the CCAA as focal areas (CHAT 1) and connectivity zones (CHAT 2). An interactive map of these areas is provided on WAFWA's Southern Great Plains CHAT at www.sgpchat.org to assist industry Participants.

In 2024, an impressive 88% of projects occurred outside of high-quality habitat. Since the start of the program, the percentage has been 75%. This demonstrates industry's commitment to implementing discretionary conservation and the effectiveness of the CCAA's incentivization strategy.

Table 3. Minimize Impacts to High-Quality Habitat (CHAT 1 & 2)

Ecoregion	Impact Acres[4] by CHAT Category				Percent	Percent
	CHAT 1	CHAT 2	CHAT 3	CHAT 4	CHAT 1-2	CHAT 3-4
2024						
Mixed Grass Prairie	63	30	580	105	12%	88%
Sand Sagebrush Prairie	10	0	0	83	10%	90%
Shinnery Oak Prairie	0	0	0	8	0%	100%
Shortgrass Prairie	0	0	0	0	--	--
Total:	**72**	**30**	**580**	**196**	**12%**	**88%**
2014-2024						
Mixed Grass Prairie	2,392	1,336	5,823	1,711	33%	67%
Sand Sagebrush Prairie	516	0	378	2,897	14%	86%
Shinnery Oak Prairie	0	31	1,419	598	2%	98%
Shortgrass Prairie	428	86	593	1,240	22%	78%
Total:	**3,337**	**1,453**	**8,212**	**6,446**	**25%**	**75%**

Note: Table includes impacts that were remediated (Section III) and mitigated (Section IV).

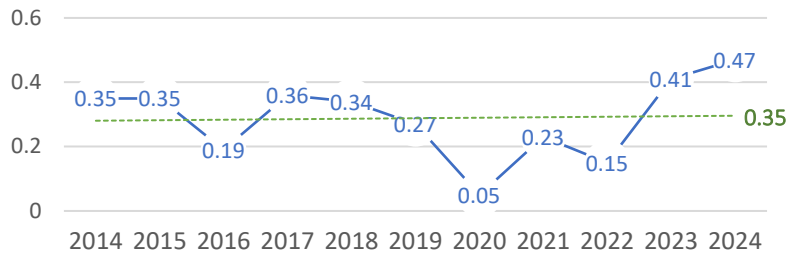
Voluntary Conservation
High Quality Habitat
75%
Avoidance Rate

II(b). By Evaluation of Habitat Conditions

In addition to using CHAT as a habitat quality indicator, a rapid habitat assessment is conducted for each project. Based on four variables: vegetation cover, composition of LPC preferred plant species, invasive woody plant occurrence, and the percentage of suitable habitat expressed as grassland within a one-mile radius. The results are represented as a Habitat Score of 0.0 to 1.0, with 1.0 representing the highest quality habitat.

In 2024, the impact areas (i.e., project footprint plus an indirect effects impact buffer) were determined to be of low-quality LPC habitat. The weighted average Habitat Score was 0.47 on a scale of 0.0-1.0. Since the start of the program, the Habitat Score was 0.35. This substantiates that the majority of impacts are occurring in areas of low-quality habitat (CHAT 3) or areas likely not habitat (CHAT 4). Refer to Appendix B for scores per ecoregion and year.

Figure 1. Habitat Quality (Habitat Score) Trend



Habitat Quality = LOW
0.35
(0.00-1.00)
demonstrating avoidance of high-quality habitat

III. Remediate Habitat Impacts (Voluntary)

The CCAA promotes and incentivizes remediation to restore LPC habitat as part of the conservation strategy. To offset impacts, Participants may elect to mitigate impacts (Mitigation), or they may utilize the 'credits' available to them from their prior remediation efforts (Remediation).

How It Works: Participants remediate/restore an existing impact (i.e., a plugged well/pad, utility line, road etc..) to CCAA habitat quality standards. When WAFWA approves the successful completion of remediation, the Participant receives Remediation Offset Units (a credit) to their Habitat Conservation Fund Account that may be used, as needed, within the ecoregion, and CHAT Category, in which the remediation occurred. The Participant covers the expense of remediation, but they avoid having to pay mitigation fees when they offset impacts using their credits. Remediation follows mitigation methodology for ensuring that remediation efforts (credits) are greater than impacts (debits), by a 2:1 ratio, resulting in a conservation benefit for the species (for details see Section IV).

III (a). Remediation Credits

In 2024, there were two remediation projects to restore 37 acres of habitat by restoration of well pads, and two remediation projects to restore 5 acres by removal of overhead utility lines. In total, there were 42 acres of habitat restored in 2024, generating 0.67 offset units. Over the life of the program, 79 acres have been restored by industry Participants, generating 31.70 offset units.

Voluntary Conservation

79 Remediated Habitat Acres

III(b). Remediation Debits

In 2024, WAFWA enrolled 2 remediation projects for 10 acres of potentially impacted habitat. This added 0.53 Impact Units for a cumulative of 13.26 Impact Units offset by remediation. The remaining balance of 18.44 remediation units provides a conservation benefit until, or unless, used to offset new industry impacts.

- Industry Participants ensure that remediated projects follow all required CCAA Conservation Measures as a term of their agreement to participate in the program.

Table 4. Remediation Ledger (Credits to Debits)

Ecoregion & CHAT Category		REMEDIATION (Credits) No. of Projects	Acres Restored	Habitat Score	Offset Units	IMPACTS (Debits) No. of Projects	Impact Acres	Habitat Score	Impact Units	**UNIT BALANCE**
2024										
Sand Sagebrush Prairie	CHAT 1	1	19	0.03	0.53	1	10	0.16	0.53	0.00
Sand Sagebrush Prairie	CHAT 4	1	18	0.01	0.14	0	0	0.00	0.00	0.14
Shinnery Oak Prairie	CHAT 3	2	5	0.02	0.00	--	--	--	--	--
Total:		**2**	**42**	**0.02**	**0.67**	**1**	**10**	**0.16**	**0.53**	**0.14**
2014-2024										
Sand Sagebrush Prairie	CHAT 1	2	50	0.50	31.56	6	107	0.07	13.26	18.30
Sand Sagebrush Prairie	CHAT 4	1	18	0.01	0.14	0	0	0.00	0	0.14
Shinnery Oak Prairie	CHAT 3	5	11	0.54	0.00	--	--	--	--	--
Total:		**8**	**79**	**0.58**	**31.70**	**6**	**107**	**0.07**	**13.26**	**18.44**

Remediated impacts are offset by restoration of habitat previously converted to oil & gas development.

2:1 Ratio = Conservation Benefit

IV. Mitigate Habitat Impacts (Mandatory)

When CCAA covered projects impacted potential habitat which cannot be fully addressed through avoidance or remediation, the CCAA employs a biologically based mitigation framework that incorporates habitat quality and quantity to define the impact to habitat as an Impact Unit. That is, the mitigation framework does not evaluate impacts based merely on the acreage amount of disturbance, it uniquely addresses the quality of habitat impacted.

How It Works: The mitigation framework provides a 2:1 mitigation ratio to ensure that mitigation efforts are greater than impacts, resulting in a conservation benefit for the species. This 2:1 ratio is built into the final unit amount by the CHAT Multiplier. The CHAT multiplier for impacts is twice the value for offsets (see diagram below). In this way, the resulting unit values can be easily balanced (i.e., 1 Impact Unit will be mitigated by 1 Offset Unit). Often these are simply referred to as credits and debits.

Conservation Benefit 2:1 Ratio

Example: 1 acre of habitat impacted, with a habitat quality score of 1.0 in a habitat focal area CHAT 1, has an Impact Unit (Debit) of 2.5. Mitigation would require 2.5 Offset Units (Credits) which are generated in the same ecoregion occurring in an equal or higher CHAT score. It would take 2 acres of conserved habitat with a habitat quality score of 1.0, in a habitat focal area CHAT 1 to generate the necessary 2.5 offset units to provide mitigation.

	Impact Multiplier	Offset Multiplier
CHAT 1	2.5	1.25
CHAT 2	2.1	1.05
CHAT 3	1.8	0.9
CHAT 4	1.6	0.8

The 2:1 ratio is built into the unit value, so that: 1 Impact Unit is mitigated by 1 Offset Unit.

In 2024, WAFWA enrolled 60 mitigation projects for 869 acres of potentially impacted habitat. This added 730 Impact Units for a cumulative of 12,500 Impact Units offset annually by conservation into perpetuity (Habitat Conservation).

Table 5. Mitigation Ledger Summary

Ecoregion	No. of Projects	Impact Acres by CHAT Category					Impact Units	Offset Units	**UNIT BALANCE**
		Total	CHAT 1	CHAT 2	CHAT 3	CHAT 4			
2024									
Mixed Grass Prairie	48	778	63	30	580	105	690		
Sand Sagebrush Prairie	8	83	0	0	0	83	28	*Offset on the cumulative*	
Shinnery Oak Prairie	4	8	0	0	0	8	12		
Shortgrass Prairie	0	0	0	0	0	0	0		
Total:	**60**	**869**	**63**	**30**	**580**	**196**	**730**		
2014-2024									
Mixed Grass Prairie	631	11,262	2,392	1,336	5,823	1,711	9,446	20,570	11,124
Sand Sagebrush Prairie	263	3,712	438	0	378	2,897	695	11,600	10,905
Shinnery Oak Prairie	482	2,048	0	31	1,419	598	1,741	7,886	6,145
Shortgrass Prairie	115	2,347	428	86	593	1,240	618	2,518	1,900
Total:	**1,491**	**19,370**	**3,258**	**1,453**	**8,212**	**6,446**	**12,500**	**42,575**	**30,075**

Conservation Efforts are Greater than Impacts

Credits Exceed Debits by 30,075 Credits — by *71%*

HABITAT CONSERVATION

The CCAA conservation strategy ensures that conservation efforts are greater than impacts, resulting in a conservation benefit for the species. In addition to the 2:1 mitigation ratio and the voluntary conservation actions by industry Participants mentioned prior, the strategy concentrates resources to provide a conservation program of habitat restoration and enhancement on private lands throughout the species' range. This ensures that WAFWA is meeting its permit requirement of providing offset units to cover the impact units (offset units ≥ impact units) and fulfills WAFWA's voluntary commitment of ensuring a conservation benefit beyond what is required by the permit.

Landowner Participation

In 2024, thirteen contracts with private Landowners secured LPC dedicated conservation on 56,617 acres (Table 6). Voluntary enrollment is secured by 10-year term agreements and permanent conservation easements through a Certificate of Participation. Enrollment into the program remains open, as needed, to ensure the CCAA obligations are met. Enrollment is guided by the CCAA's conservation strategy.

Enrollment Changes in 2024

- One new contract was acquired in the Shinnery Oak Prairie to enroll 3,815 acres under a 10-year agreement.
- Four contracts expired on 09/30/2024, releasing 16,257 acres from enrollment.

Strategic Location

To implement the CCAA conservation strategy of ensuring conservation efforts are greater than impacts, WAFWA targets enrollment of large blocks of high-quality habitat in geographic areas of greatest conservation value to the LPC; defined in the CCAA as focal areas (CHAT 1) and connectivity zones (CHAT 2). In 2024, an impressive 98% of the conservation properties occurred within areas of greatest conservation value (Table 6). As importantly, WAFWA ensured that enrollment is strategically located in ecoregions that will balance the need for offset units.

Strategic Location

98%

in areas of greatest conservation value

Habitat Acres

Of the enrolled acreage, the CCAA only utilizes those acres considered to be LPC habitat unaffected by land conversion or by direct/indirect impacts resulting from developments such as oil & gas activities, transmission lines, communication towers, roads and buildings (Habitat Acres). A field review of the conservation properties is conducted annually to determine if habitat impacts have changed on the landscape. In 2024, the review confirmed 49,925 Habitat Acres, representing 88% of the total enrolled acreage. The remaining enrolled acres (6,692 impacted acres) serve a valuable function as a habitat buffer and are managed as LPC habitat, however from this point forward we only refer to the Habitat Acres for defining CCAA accomplishments.

Table 6. Habitat Conserved in 2024

Ecoregion	No. of Properties	Total Acres	Habitat Acres					% Habitat CHAT 1 & 2
			Total	CHAT 1	CHAT 2	CHAT 3	CHAT 4	
Mixed Grass Prairie	4	21,818	18,865	18,474	0	159	232	98%
Sand Sagebrush Prairie	2	16,185	15,629	15,629	0	0	0	100%
Shinnery Oak Prairie	4	15,193	12,310	10,362	1,516	432	0	96%
Shortgrass Prairie	3	3,421	3,120	3,120	0	0	0	100%
TOTAL:	**13**	**56,617**	**49,925**	**47,585**	**1,516**	**591**	**232**	**98%**

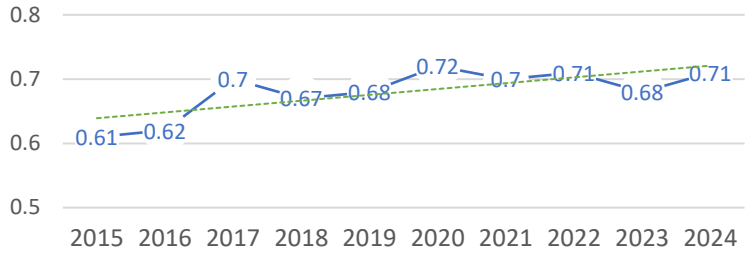
49,925 Habitat Acres Conserved

Habitat Conditions

In addition to using CHAT as a habitat quality indicator, a rapid habitat assessment is conducted in the field, annually, for each property. Based on four variables: vegetation cover, composition of LPC preferred plant species, invasive woody plant occurrence, and the percentage of suitable habitat expressed as grassland within a one-mile radius. The results are represented as a Habitat Score of 0.0 to 1.0, with 1.0 representing the highest quality habitat. It is important to recognize that not all evaluation units have the characteristics to achieve a 1.0 score, often due to soil structure, slope or for other reasons. Therefore, each property is managed to reach its highest potential.

In 2024, the quality of habitat on the conservation properties was determined to be of high-quality. The weighted average HEG score was 0.71 on a scale of 0.0-1.0. This shows a gradual increasing trend in quality over time. Refer to Appendix C for Habitat HEG scores per ecoregion and year.

Figure 4. Habitat Quality (Habitat Score) Trend



Habitat Quality = HIGH

0.71

(0.00-1.00)

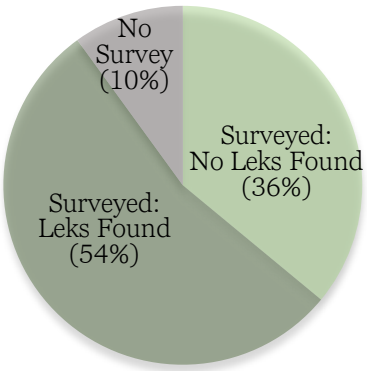
Habitat is of higher quality than the land it offsets

Lek Occurrence

WAFWA and our partnering state wildlife agencies voluntarily conduct ground-based, LPC lek surveys on the conservation properties following U.S. Fish and Wildlife Service protocols. This voluntary action helps inform when certain conservation measures will be required. Specifically, those pertaining to addressing disturbances or threats to the species in the vicinity of active leks during the breeding season (March 1 – July 15).

In 2024, 90% of the enrolled acres were surveyed. The surveys identified 14 active leks[5] onsite, with another 16 active leks located within a 1.25-mile radius (Table 8). The surveys identified that 11 of the 13 projects surveyed had one or more active leks within a 1.25-mile radius (85% occurrence rate). Refer to Appendix C for results per ecoregion/year.

Figure 5. Lek Survey Results (2024)



Conserved

14

Lesser Prairie Chicken Leks

Active Lek

85%

Occurrence Rate

[5] Active Leks: LPC leks recorded as active at least once within the previous five years.

Habitat Management

WAFWA works with the property owners and their leasee to develop a site-specific management plan for all enrolled acres focused on addressing LPC threats and improving habitat quality. The CCAA provides for two types of management plans: a Rangeland Management Plan to address LPC threats on native grazed rangelands, and a Planted Grass Management Plan to address LPC lands conversion back to native vegetation. Implementation of the WAFWA-approved management plan is a compliance requirement of the Certificate of Participation.

Restoration & Enhancement Activities

Under the CCAA, restoration is achieved by conversion of cropland to native vegetation, removal of abandoned or unnecessary infrastructure, and conversion of unsuitable grassland habitat due to the presence of exotic or invasive woody species to suitable habitats. Enhancement is achieved by implementing grazing systems designed to improve LPC habitat, use of grazing deferments, and suppression of shinnery oak to restore historical site conditions that existed prior to overgrazing. All restoration and enhancement areas include the removal of LPC threats such as installation of wildlife escape tank ladders and visual fence markers.

I. Restoration (Voluntary). Habitat restoration was largely completed in the early years of the program on the newly enrolled acreage, between 2015-2018, resulting in 10,299 acres of habitat restoration. As those 10-year agreements expire, new enrollment will prioritize sites that have restoration opportunities. Providing restoration is part of WAFWA's voluntary commitment of ensuring a conservation benefit beyond what is required by the permit.

II. Enhancement (Mandatory). As a term of enrollment, land with livestock will follow a WAFWA-approved grazing management plan that includes the CCAA requirement for deferments (rest) and limited utilization, among other conditions. This ensures that any grazing-related habitat-limiting factors are addressed, and that habitat conditions improve over time (i.e., enhancement). The desired and expected outcome is to promote rangelands managed sustainably for ranching operations, while providing healthy ecological processes and high-quality LPC habitat.

In 2024, WAFWA contracted for 859 acres of shinnery oak suppression and deferred grazing to enhance habitat on a newly enrolled property. In total, there were 56,617 acres enhanced by grazing management in 2024.

Table 7. Restoration and enhancement.

Ecoregion	ENHANCEMENT		RESTORATION	
	Grazing Management[1] to Improve LPC Habitat	Shinnery Oak Suppression to Improve LPC Habitat	Invasive Woody Vegetation Removal (mesquite, red cedar)	Crop Restoration to Native Grass
2024				
Mixed Grass Prairie	21,818	0	0	0
Sand Sagebrush Prairie	16,185	0	0	0
Shinnery Oak Prairie	15,193	859	0	0
Shortgrass Prairie	3,421	0	0	0
2024 Total:	**56,617**	**859**	**0**	**0**
2014-2024				
Mixed Grass Prairie	76,627	0	2,873	0
Sand Sagebrush Prairie	26,509	0	0	0
Shinnery Oak Prairie	20,802	9,131	6,176	629
Shortgrass Prairie	12,578	0	0	620
TOTAL:	**136,516**	**9,131**	**9,049**	**1,250**

[1] Grazing management is applied to all enrolled lands where grazing occurs (i.e., the total enrolled acres).

Voluntary Conservation Benefit — 10,299 Acres of Restored Habitat

Offset Units Generated

Offset units (credits) are generated when LPC conservation activities are implemented to the terms of the Certificate of Participation and the WAFWA-approved management plan. For each year a property is under agreement, it will generate offset units based on the LPC habitat quality (HEG score) of the habitat acres. This system is performance-based in the sense that higher quality habitat generates more offset units per acre which results in higher payments. The calculation to generate offset units is the same as impact units, where a 2:1 ratio ensures that mitigation efforts are greater than impacts, resulting in a Net Conservation Benefit for the species. Refer to section III Mitigation of Habitat Impacts for an overview of the 2:1 ratio calculation.

In 2024, conservation efforts on 49,925 habitat acres generated 42,575 offset units (credits).

Table 8. Conservation efforts to generate the 2024 offset units (credits).

Site	Term	Expiration	Plan Type	Enrolled Acres	Habitat Acres	Habitat Score*	CHAT Score*	% Suitable Habitat*	Leks Onsite	Leks w/in 1.25 mi.	Credits Generated
Mixed Grass Prairie											
CZ036	10 Years	09/30/34	Range	18,920	15,985	0.87	1.0	96.3%	0	0	17,323
CZ063	Permanent	--	Range	1,758	1,740	1.00	1.0	98.4%	0	3	2,125
CZ065	Permanent	--	Range	968	968	0.77	1.0	85.0%	1	1	927
CZ066	10 Years	09/30/26	Range	172	172	0.90	1.0	81.5%	0	3	194
				21,818	**18,865**	**0.88**	**1.0**	**95.8%**	**1**	**3[a]**	**20,570**
Sand Sagebrush Prairie											
CZ016	10 Years	09/30/24	Range	2,251	1,892	0.67	1.0	90.8%	0	0	1,585
CZ088	Permanent	--	Range	13,934	13,737	0.59	1.0	89.1%	5	5	10,016
				16,185	**15,629**	**0.60**	**1.0**	**89.3%**	**5**	**5**	**11,600**
Shinnery Oak Prairie											
CZ003	10 Years	09/30/24	Range	9,508	7,455	0.56	1.0	98.3%	3	8	5,101
CZ013	10 Years	09/30/24	Grass	316	280	1.00	1.0	99.1%	0	4	351
CZ026	Permanent	--	Range	1,554	1,217	0.66	1.0	91.1%	0	1	954
CZ089	10 Years	09/30/34	Range	3,815	3,357	0.63	1.0	95.5%	2	5	1,480
				15,193	**12,310**	**0.60**	**1.0**	**96.8%**	**5**	**6[a]**	**7,886**
Shortgrass Prairie											
CZ035	10 Years	09/30/24	Range	1,109	1,066	0.76	1.0	84.7%	1	0	1,015
CZ061	10 Years	09/30/25	Range	1,692	1,491	0.64	1.0	72.8%	2	0	1,186
CZ062	10 Years	09/30/25	Grass	620	563	0.45	1.0	38.2%	0	2	317
				3,421	**3,120**	**0.65**	**1.0**	**70.6%**	**3**	**2**	**2,518**
			Total in 2024:	56,617	49,925	0.71	**1.0**	92.4%	14	16	42,575

* Weighted averages by the conservation sites' habitat acres.

[a] Total lek occurrence within an ecoregion is lower than the sum; one or more conservation sites share occurrence with the same lek.

Conservation Benefit: Permanent LPC Conservation

35%
Permanent Conservation

The CCAA conservation strategy targets at least 25% of the offset units to be generated from permanent easements to support long-term lesser prairie-chicken conservation.

In 2024, this goal was met and exceeded by having over 35% of the offset units generated from permanent conservation easements. This permanency of conservation contributes further to the voluntary conservation benefit of the species.

UNIT LEDGER

Transactions through the CCAA are tracked by WAFWA in real time with a data management system designed specifically for the CCAA to safeguard confidentiality and to ensure appropriate tracking and accountability of the impact units (debits) and offset units (credits). This tracking "ledger" ensures impact units are debited from the same ecoregion in which they occurred and credited in an equal or higher CHAT category.

Ledger Summary

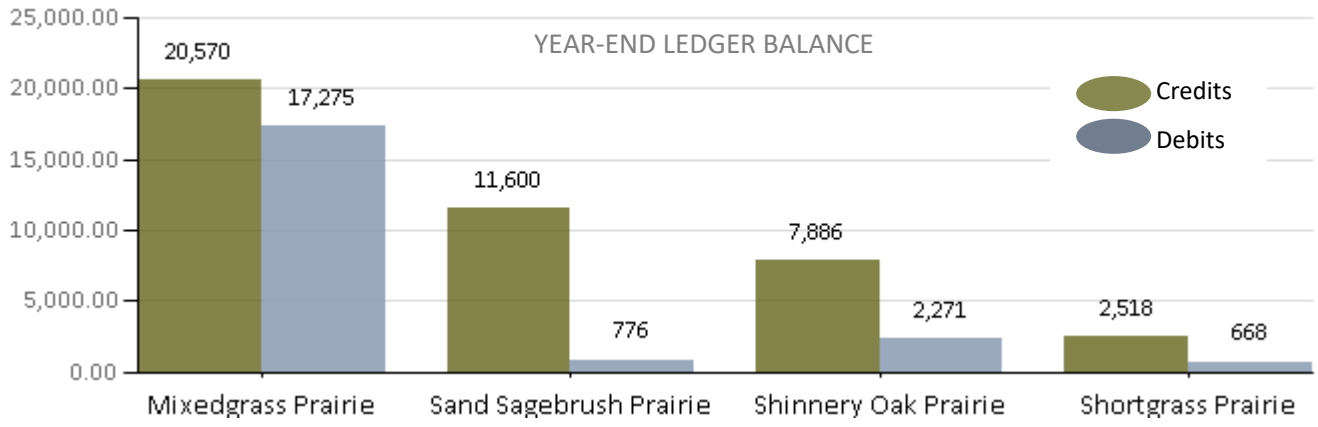
As of December 31, 2024, the credits to debits were balanced for each of the four ecoregions. Across the ecoregions, 49% of the available credits were utilized. The remaining credits were carried over into 2025, to be available until July 31, 2025. At which point, any unused credits will expire, and the new credits generated in 2025 will be applied to the ledger. There were 27,334 unused credits that expired on July 31, 2024 (Appendix A). This demonstrates the program's voluntary commitment of ensuring conservation efforts are greater than impacts (Net Conservation Benefit). Refer to Appendix A for a year-end review since the inception of the program.

Table 09. Year-end ledger of mitigation debits and credits.

Ecoregion	Credits	Debits	Balance	Utilization Rate
Mixed Grass Prairie	20,570	-17,275	3,295	84%
Sand Sagebrush Prairie	11,600	-776	10,824	7%
Shinnery Oak Prairie	7,887	-2,271	5,615	29%
Shortgrass Prairie	2,518	-668	1,850	27%
2024 TOTAL:	**42,575**	**-20,990**	**21,584**	**49%**

49%

Low Credit Utilization Rate = High Conservation Benefit



Conservation Efforts are Greater than Impacts

Credits Exceed Debits by 30,075 Credits

by *71%*

FINANCIAL SUMMARY

WAFWA and SRF focus on growing the conservation endowment to provide support for the budgeted administrative and management costs of implementing the CCAA and to provide the liquidity required to secure the necessary annual conservation offset units as prescribed in the CCAA. The WAFWA/SRF fiscal year 2024 financial audit and accompanying IRS form 990 provides findings that the CCAA is financially sustainable at its current rate of use to carry out it's obligations to the CCAA (available online at www.wafwa.org/about-us/). Considering the audit's financial information is provided on WAFWA's fiscal (July 1 to June 30), we provide herein an annual summary.

Conservation Expenditures

In 2024, the SRF paid $778,325 in habitat conservation payments to CCAA enrolled private landowners for carrying out the terms of their CCAA Certificate of Participation. Since the start of the program, $19.3 million has been spent on conservation efforts. See Appendix C for a summary by ecoregion.

Table 10 - Habitat conservation payments, summary by payment type and year.

Year	Sign-up Incentive	Restoration Payment	Permanent Easement Acquisition	Annual Payment (Agreements)	Annual Payment (Easements)	Total
2015	$327,492	$498,508	$33,500	$980,886	$9,007	$1,849,393
2016	$25,321	$803,608	--	$1,094,175	$9,627	$1,932,731
2017	$243,562	$536,950	$1,924,569	$1,606,763	$473,254	$4,785,097
2018	--	$262,666	--	$1,573,251	$447,914	$2,283,831
2019	--	$110,831	--	$1,558,993	$471,988	$2,141,811
2020	--	$46,773	--	$1,652,965	$502,558	$2,202,296
2021	--	--	--	$1,606,369	$125,381	$1,731,750
2022	--	--	--	$819,791	$118,728	$938,519
2023	--	--	--	$617,200	$83,315	$700,515
2024	$16,787	$23,390	--	$655,350	$82,798	$778,325
Total:	**$613,162**	**$2,282,726**	**$1,958,069**	**$12,165,741**	**$2,324,571**	**$19,344,268**

$19.3M
Conservation Expenditures

Financial Partnership Contributions

Starting in 2021, annual conservation payments were voluntarily forfeited for two properties under permanent conservation easements (CZ088, CZ026). This contribution ensures that over fifteen thousand acres of habitat are managed for the species into perpetuity without further expense.

Administrative Fund Expenditures

The CCAA operates under a voluntary, annual administrative budget of $500,000. The budget was established by WAFWA/SRF in the 2021 Business Plan as sufficient to cover the management of the CCAA for the near future. The budget provides for staffing to manage the CCAA, contract support, insurance, and software/licensing costs.
In 2024, the total administrative expenditure was below budget, with expenses of $440,440.

Industry Paid Mitigation Fees

In 2024, Participants paid $1,185,436 in mitigation fees for projects enrolled (Appendix B). Most of the fees paid were by payment from the Participant's prepaid balance of their Habitat Conservation Fund Account. In 2024, $19,856 was received by SRF for mitigation fee payment, the remainder ($1,165,580) was by use of prepaid funds.

Sustainable Investment Standard

To support long-term assurances that CCAA investments are held sustainably to support conservation delivery, WAFWA/SRF voluntarily established a Sustainable Investment Standard in 2024. This tracks the investment's performance and use against its objectives, accounting for variances in market performance, and identifies a threshold at which an excessive draw-down of funds may diminish the long-term sustainability of the CCAA.

The Sustainable Investment Standard is established using a five-year programmatic review process that was conducted in 2024, effective for the reporting period of 2024-2028. Variables accounted for in the Sustained Investment Standard include: 1] annual conservation cost (see Financial Summary - Conservation Expenditures) plus a 20% buffer, 2] 1-Year's reserve of conservation costs plus the 20% buffer, 3] the investment required to provide the conservation costs at an assumed 5% rate of return on investments (expressed as an Endowment Multiplier of 20), and 4] the nondepleting administrative investment (established in the 2021 Business Plan as $10 million) to support CCAA administrative costs (see section Financial Summary - Administrative Funds).

Sustainable Investment Standard - The required base investment needed for the non-wasting endowment to ensure that the long-term return on the investment can support the annual CCAA expenditures, formulated as follows:

(((Conservation Cost x 20% Buffer) x Endowment Multiplier of 20)
x 1-Yr. Conservation Reserve) + Administrative Fund Reserve

As of December 31st, 2024, the CCAA investment totaled $38,444,509, demonstrating the CCAA investments were safely above the Sustained Investment Standard of $29,613,785. Additionally, fiscal year investment totals are verified in the Financial Audit, publicly disclosed and available on WAFWA's website (www.wafwa.org/about-us/).

Sustained Investment Standard = $29,613,785
2024 Investment Total = $38,444,509

PARTICIPANT COMPLIANCE

Conservation Measures

The CCAA includes Conservation Measures (CMs) developed to 'avoid' and 'minimize' impacts on LPC and their habitat, and to 'mitigate' for any remaining habitat impacts. Some of the avoidance and minimization measures are required and some may be applied at the discretion of the Participant. If a Participant chooses not to implement a discretionary CM, such as the avoidance of an impact, then the Participant has agreed to mitigate that impact. If a Participant fails to implement a mandatory CM, and the issue cannot be resolved to the terms of the Certificate of Inclusion, then the Participant may be subject to the provisions of CCAA Section XXX for termination. WAFWA utilizes various trainings, quality assurance reviews, and compliance checks to help ensure Participants are effectively conducting both the discretionary and required conservation measures.

- Discretionary: Participants have demonstrated their continued commitment to implement voluntary conservation measures, as documented by the resulting conservation successes (Conservation Strategy).
- Mandatory: The following sections provide an annual overview of WAFWA's compliance review findings.

I. Annual Field Review of Randomly Sampled Mitigated Projects

WAFWA provides an annual, random field review of industry enrolled projects to ensure mandatory conservation measures are being implemented. Projects eligible for review include projects that have been in-part or wholly constructed and where the project has not been previously reviewed within the last three years. Of eligible projects to review, a random selection of up to 50 projects per ecoregion are selected. There is a limitation on reviewing no more than 10 projects, per company, in any given year. The review consists of a trained WAFWA representative meeting with the Participant at the project site. Starting in 2021, WAFWA elected to utilize an independent, third-party contractor to perform the reviews. A standardized reporting form is completed, along with photo documentation.

Independent 3rd Party Review

In 2024, all reviewed industry projects were found to be in compliance with the terms of their enrollment. The random sample resulted in 28 projects to be reviewed. One project was no longer under the control of the Participant. Ten were not constructed and were deferred to the 2025 compliance season. Of the resulting 17 projects reviewed, all were found to be implementing the required conservation measures, see table below.

Table 11. Industry Compliance (2024)

Compliance Review Questions	No. of Responses		
	YES	NO	N/A
Is the location of the project mapped accurately within CCAA standards?	17	0	--
Are all developments relating to this project and under the control of the Participant mitigated? Specifically, any project associated developments (i.e., new roads, utility lines etc.) that extend or have impacts beyond the project's impact buffer must be mitigated.	17	0	--
Is there sufficient evidence that the breeding season (March 1 and July 15) restrictions are being followed?	17	0	--
If the project is within 1.25 miles of an active lek*, are there WAFWA design-approved wildlife escape ramps in all project-associated, human-made water containment sources?	0	0	17
If the project is within 0.25 miles of an active lek*, are there WAFWA design-approved markers on all fence lines associated with this project and under the control of the participant?	0	0	17
If the project is within 1.25 miles of an active lek*, are the requirements for not applying broadcast herbicide use outside the facility boundary being followed by the Participant?	0	0	17
If the project is within 1.25 miles of a lek*, is the project compliant with respect to noise levels recorded at 30 feet from the facility boundary?	0	0	17
If a transmission project, are all poles in CHAT 1-3 monopole?	0	0	17
Were there any compliance issues found?	**0**	**17**	**--**

*If there is no current lek survey (no survey in the last 5 years), then the site is assumed to have a lek.

II. Operations During the Breeding Season

There are several avoidance and minimization Conservation Measures related to emergency and non-emergency operations occurring during the LPC breeding season (March 1 and July 15) that are within 1.25 miles of active leks. Participants are required to report to WAFWA within 30 days of an emergency operation, if it occurred during the LPC breeding season, and to annually report (by February 15) any non-emergency operations.

In 2024, there were no instances of emergency or non-emergency operations reported by Participants. Since the start of the program, there have been six (6) reports of emergency operations and 26 non-emergency operations occurring. All occurrences occurred within the first 5 years of the program.

Industry's Certificate of Inclusion (CI) Terms & Conditions

As a term of enrollment, Industry Participants have agreed to actively participate in the CCAA by following the conservation measures on projects as long as they are enrolled (as discussed above), periodically reporting, and by ensuring all of their oil & gas development activities occurring on enrolled lands are submitted to the CCAA. WAFWA periodically reviews each of these items, in addition to the other terms and conditions of enrollment.

I. Project Submittals

WAFWA voluntarily reviews state well permitting data for industry Participants; to help ensure their compliance with the requirement to submit all oil and gas related developments occurring on their enrolled land. This review was initiated by WAFWA in 2017 and has become part of the annual review process. In summary, WAFWA geospatially identifies if any state permitted wells have not been submitted for enrollment. If identified, WAFWA contacts the Participant to either initiate enrollment or to clarify the reason for non-enrollment (i.e., the well is no longer under the control of the Participant or is no longer planned to be constructed).

In 2024, WAFWA identified 8 well permits occurring on enrolled lands that were further reviewed with Participants. All but one project warranted non-enrollment. The one project identified as needing to be enrolled, was promptly enrolled by the participant and not considered to be a compliance violation.

II. Unpaid Enrollment Fees

If an industry Participant fails to remit the Enrollment Fee in accordance with the CCAA terms of Section XIII (Enrollment and Mitigation Fees), WAFWA may suspend the Participant's Certificate of Inclusion until paid. In 2024, there were no compliance issues with outstanding payments.

III. Reporting Requirements

Participant reporting requirements include: 1) notice of emergency or non-emergency operations during the breeding season when near an active lek (as mentioned above), and 2) report of intended next year's use of the program by October 1st of each year. In 2024, there were no compliance issues with reporting.

Landowner's Certificate of Participation (CP) Terms & Conditions

Compliance monitoring of conservation properties occurs 1) during annual field monitoring by WAFWA's certified Technical Service Providers (TSPs), 2) through pre- and post-grazing season reviews, and 3) by certification of completed restoration or enhancement activities. In 2024, no compliance issues were found occurring on the conservation properties, and no impacts/actions off-site were found to adversely affect habitat conditions onsite.

MORTALITY OR INJURY REPORT

There have been no LPC mortalities or injuries observed or reported since the start of the program in 2014.

INCIDENTAL TAKE

The permit issued to WAFWA/SRF by the USFWS (Permit # TE27289B-0) on 02/28/2014 stipulates that incidental take of LPC may not exceed 8,530 birds, as measured by the following habitat impacts:

a) If 10 years from the effective date of the permit (02/28/2024), more than 622,272 acres of habitat are developed by CCAA oil and gas activities within the Covered Area.
b) If at 20 years, more than 1,244,545 acres.
c) If at 30 years, more than 1,866,855 acres.

As of 2024, the acres impacted through the CCAA total 19,448 acres (Appendix B, Impact Acres). This represents 3% of the impacted acreage allowed by the CCAA permit in the first 10 years of the program and 0.99% of the total allowable impact over the 30-year life of the program.

POPULATION SURVEYS

I. Range-wide Aerial Surveys. WAFWA and its partners conducted aerial surveys for ten years (2012-2022) to estimate the annual range-wide population size of LPC and to evaluate trends in time. Annual survey reports can be found online at: https://wafwa.org/initiative-programs/lesser-prairie-chicken/.

II. Industry Lek Surveys. Annually, industry participants are encouraged through the CCAA conservation strategy to conduct LPC lek surveys following U.S. Fish and Wildlife Service approved protocols. This voluntary action helps inform when certain conservation measures will be required. Specifically, where lek surveys do not fully saturate the area of direct or indirect impact, industry Participants must assume leks are within the project area. In which case, all conservation measures are applied, including those related to restricting project activities during the breeding season. This incentives Participants to conduct surveys. Survey efforts are provided on WAFWA's Southern Great Plains CHAT at www.sgpchat.org.

III. Conservation Property Lek Surveys. WAFWA, at its discretion, utilizes the CCAA Conservation Fund to conduct LPC lek surveys on enrolled conservation properties. The results can be found in the Habitat Conservation section.

LITERATURE CITED

Dillon, J. 2025. Technical Memo - 2024 Program Audit for the Candidate Conservation Agreement with Assurances for the Lesser Prairie Chicken. Cedar Creek Associates, Inc. Fort Collins, Colorado.

FWS. 2014. Range-Wide Oil and Gas Candidate Conservation Agreement with Assurances for the Lesser Prairie-Chicken (*Tympanuchus pallidicinctus*) in Colorado, Kansas, New Mexico, Oklahoma, and Texas. 78 FR 76639.

Van Pelt, W.E., et.al. 2013. The Lesser Prairie-Chicken Range-wide Conservation Plan. Western Association of Fish and Wildlife Agencies. Cheyenne, Wyoming. 367 pp.

WAFWA, 2021. Updated Business Plan for WAFWA's LPC CCAA. Western Association of Fish and Wildlife Agencies. Boise, Idaho. 20 pp.

APPENDICES

Appendix A. Running Ledger of Mitigation Debits to Credits

Ecoregion	Year	Expired Credits	YEAR-END BALANCE		
			Credits	Debits	Balance
Mixed Grass Prairie	2014		4,542	-3,342	1,200
	2015	0	28,820	-16,067	12,754
	2016	-3,139	40,042	-16,035	24,006
	2017	-24,510	56,409	-17,112	39,297
	2018	-40,114	55,380	-17,333	38,047
	2019	-38,907	54,325	-17,471	36,854
	2020	-37,815	57,361	-17,471	39,890
	2021	-40,902	56,091	-17,472	38,619
	2022	-47,439	29,474	-17,473	12,001
	2023	-1,598	20,266	-17,546	2,720
	2024	-11,238	20,570	-18,236	2,334
Sand Sagebrush Prairie	2014			-9	(9)
	2015		8,488	-871	7,617
	2016	-7,269	8,385	-613	7,772
	2017	-7,763	32,805	-677	32,128
	2018	-32,121	30,765	-689	30,075
	2019	-30,071	32,795	-720	32,075
	2020	-32,075	34,045	-726	33,319
	2021	-33,259	34,031	-727	33,304
	2022	-24,858	23,264	-736	22,528
	2023	-12,103	23,382	-758	22,625
	2024	-14,186	24,663	-786	23,877
Shinnery Oak Prairie	2014		288	-162	126
	2015	0	10,060	-1,701	8,358
	2016	-7,812	7,649	-1,431	6,218
	2017	-6,178	8,881	-1,636	7,245
	2018	-7,187	7,637	-1,768	5,868
	2019	-5,792	8,238	-1,845	6,393
	2020	-6,393	8,744	-1,845	6,899
	2021	-6,907	7,512	-1,845	5,667
	2022	-5,894	7,702	-1,850	5,853
	2023	-2,092	6,447	-2,259	4,189
	2024	-4,718	7,886	-2,271	5,615
Shortgrass Prairie	2014		147	-411	(264)
	2015	-4	1,994	-861	1,133
	2016	-820	3,928	-617	3,311
	2017	-3,209	7,847	-633	7,214
	2018	-7,181	7,377	-667	6,710
	2019	-6,710	7,331	-667	6,664
	2020	-6,664	8,521	-667	7,854
	2021	-7,854	8,193	-667	7,525
	2022	-7,574	5,413	-668	4,744
	2023	-3,727	2,194	-668	1,525
	2024	-1,575	2,518	-668	1,850
	TOTAL:	-537,655	812,408	-208,678	603,730

Appendix B. Industry Impact by Year (2014-2024)

Year	# of Projects	Potential Impact Ac.	Impact Acres	Habitat Score*	CHAT Score*	% Suitable Habitat*	Leks w/in 1.25 mi	Industry Paid Mitigation Fees	Impact Units	Cumulative Impact Units
Mixed Grass Prairie										
2014	180	5,600	3,274	0.42	2.6	85.1%	9	$3,416,061	2,599	2,599
2015	299	9,346	5,655	0.42	2.5	85.6%	13	$6,079,395	4,684	7,283
2016	10	371	105	0.39	3.0	67.3%	0	$92,955	69	7,352
2017	53	1,656	908	0.53	2.8	78.0%	4	$1,296,426	941	8,293
2018	19	632	268	0.43	2.7	87.4%	0	$315,055	219	8,513
2019	6	186	80	0.64	2.4	91.1%	0	$156,195	109	8,621
2020	0	0	0	--	--	70.5%	--	$0	0	8,621
2021	2	62	7	0.05	4.0	59.5%	0	$632	1	8,622
2022	4	156	61	0.32	4.0	64.1%	0	$44,495	31	8,653
2023	10	297	127	0.45	3.3	88.6%	0	$156,726	103	8,756
2024	48	1,468	778	0.49	2.9	85.1%	0	$1,149,695	690	9,446
Total	**631**	**19,775**	**11,262**	**0.43**	**2.6**	**84.6%**	**26**	**$12,707,636**	**9,446**	**9,446**
Sand Sagebrush Prairie										
2014	45	1,367	629	0.06	3.8	5.7%	0	$4,441	7	7
2015	72	2,236	1,345	0.19	3.3	23.9%	0	$271,212	515	522
2016	22	683	338	0.07	3.6	14.6%	0	$28,993	53	575
2017	33	1,024	534	0.03	3.5	15.6%	0	$11,444	21	596
2018	16	497	136	0.07	3.8	32.7%	0	$7,238	12	608
2019	30	902	285	0.08	3.9	14.1%	2	$17,759	30	638
2020	12	372	71	0.05	3.9	5.5%	0	$3,494	6	644
2021	7	192	45	0.26	4.0	29.5%	0	$690	1	645
2022	9	316	94	0.07	2.5	25.3%	0	$9,243	16	661
2023	13	403	221	0.05	3.3	26.5%	0	$11,272	16	677
2024	9	279	93	0.21	3.7	31.7%	0	$21,769	28	705
Total	**268**	**8,272**	**3,791**	**0.11**	**3.5**	**18.5%**	**2**	**$387,555**	**705**	**705**
Shinnery Oak Prairie										
2014	47	1,453	162	0.56	3.4	89.0%	0	$146,512	162	162
2015	124	3,844	752	0.37	3.2	66.2%	0	$549,689	632	794
2016	71	2,203	222	0.29	3.3	54.0%	0	$98,322	112	906
2017	78	2,403	242	0.50	3.6	67.1%	0	$181,925	200	1,106
2018	77	2,372	169	0.41	3.5	77.6%	0	$112,836	119	1,225
2019	46	1,427	99	0.51	3.4	81.0%	0	$85,986	90	1,315
2020	9	310	0	0.00	0.0	0.0%	0	$0	0	1,315
2021	0	0	0	--	--	77.5%	--	$0	0	1,315
2022	4	98	4	0.67	3.5	80.5%	0	$4,871	5	1,320
2023	22	863	389	0.60	3.1	95.5%	0	$444,125	409	1,729
2024	4	124	8	1.0	4.0	89.0%	0	$14,366	12	1,741
Total	**482**	**15,097**	**2,048**	**0.45**	**3.3**	**71.3%**	**0**	**$1,638,633**	**1,741**	**1,741**
Shortgrass Prairie										
2014	31	950	783	0.24	3.0	40.5%	6	$166,374	209	209
2015	71	2,074	1,350	0.20	3.2	39.1%	3	$293,655	344	553
2016	5	155	83	0.11	4.0	14.3%	0	$12,344	15	568
2017	3	93	56	0.11	2.3	42.7%	0	$13,615	16	583
2018	2	62	34	0.41	1.6	68.1%	2	$30,154	34	617
2019	1	31	2	0.03	4.0	42.6%	0	$78	0	618
2020	0	0	0	--	--	--	--	$0	0	618
2021	0	0	0	--	--	--	--	$0	0	618
2022	2	81	39	0.01	4.0	17.6%	0	$569	1	618
2023	0	0	0	--	--	--	0	$0	0	618
2024	0	0	0	--	--	--	0	$0	0	618
Total	**115**	**3,446**	**2,347**	**0.21**	**3.1**	**38.8%**	**11**	**$516,790**	**618**	**618**
2024 Total:	**61**	**1,871**	**879**	**0.47**	**3.0**	**82.7%**	**0**	**$1,185,436**	**731**	**12,510**
TOTAL:	**1,496**	**46,590**	**19,448**	**0.35**	**2.9**	**64.8%**	**39**	**$15,244,650**	**12,510**	**12,510**

* Weighted averages by the sites' evaluation units.

Appendix C. Conservation by Year (2014-2024)

Year	# of Contracts	Enrolled Acres	Habitat Acres	Habitat Score*	CHAT Score*	% Suitable Habitat*	Leks w/in 1.25 mi	Conservation Payments**	Credit Units
Mixed Grass Prairie									
2014	2	23,305	--	--	--	--	--	--	4,542
2015	4	62,127	49,880	0.60	1.5	84.8%	0	$1,002,217	28,820
2016	4	61,185	50,471	0.69	1.6	94.4%	0	$1,156,262	40,042
2017	9	76,627	65,773	0.76	1.4	94.5%	13	$1,491,733	56,409
2018	9	76,627	65,090	0.75	1.4	94.4%	13	$1,377,357	55,380
2019	9	76,627	65,022	0.74	1.4	94.4%	6	$1,327,961	54,325
2020	9	76,627	65,163	0.77	1.4	95.4%	6	$1,457,776	57,361
2021	9	76,627	65,163	0.76	1.4	95.4%	5	$1,385,217	56,658
2022	9	76,627	65,163	0.79	1.4	95.4%	5	$716,773	29,474
2023	4	21,818	18,763	0.88	1.0	95.8%	8	$543,089	20,266
2024	4	21,818	18,865	0.88	1.0	95.8%	8	$557,437	20,570
Total	9	78,986	66,734	0.75	1.4	94.0%	--	$11,015,822	--
Sand Sagebrush Prairie									
2014	0	--	--	--	--	--	--	--	0
2015	1	12,689	9,012	0.75	1.0	83.1%	0	$171,009	8,488
2016	1	12,683	8,954	0.75	1.0	83.0%	0	$120,405	8,385
2017	2	42,309	22,692	0.69	1.0	91.4%	12	$625,217	32,805
2018	2	42,168	22,532	0.66	1.0	91.4%	15	$455,930	30,765
2019	2	42,168	22,536	0.70	1.0	91.5%	15	$486,026	32,795
2020	2	42,168	22,543	0.72	1.0	84.7%	15	$504,553	34,045
2021	2	28,598	24,616	0.72	1.0	84.7%	14	$128,669	23,747
2022	2	26,509	22,543	0.65	1.0	86.1%	10	$50,280	12,743
2023	2	16,185	15,634	0.54	1.0	89.3%	10	$36,452	10,479
2024	2	16,185	15,629	0.60	1.0	89.3%	10	$29,728	11,600
Total	2	42,315	37,910	0.68	1.0	88.2%	--	$2,608,269	--
Shinnery Oak Prairie									
2014	2	--	--	--	--	--	--	--	288
2015	4	17,707	13,788	0.61	1.1	94.4%	28	$592,717	10,060
2016	4	17,600	13,975	0.44	1.1	94.1%	21	$535,925	7,649
2017	4	17,613	13,975	0.52	1.1	95.3%	19	$604,139	8,881
2018	4	17,613	13,917	0.45	1.1	95.3%	20	$274,292	7,637
2019	4	17,613	13,917	0.48	1.1	95.3%	19	$204,683	8,238
2020	4	17,613	13,930	0.52	1.1	93.5%	19	$97,660	8,744
2021	4	17,613	13,930	0.45	1.1	93.5%	19	$80,996	7,512
2022	4	17,613	13,930	0.59	1.1	93.5%	29	$75,604	7,702
2023	3	11,378	9,014	0.59	1.0	97.3%	17	$71,674	6,447
2024	4	15,193	12,310	0.60	1.0	96.8%	20	$128,923	7,886
Total	5	21,522	17,374	0.52	1.0	94.8%	--	$2,666,612	--
Shortgrass Prairie									
2014	0	--	--	--	--	--	--	--	147
2015	2	5,142	5,052	0.39	1.8	82.3%	2	$49,951	1,994
2016	4	9,501	8,857	0.38	1.4	71.4%	6	$120,139	3,928
2017	7	13,192	11,722	0.56	1.3	81.3%	8	$139,439	7,847
2018	7	13,192	11,674	0.53	1.3	81.2%	9	$176,253	7,377
2019	7	13,198	11,652	0.53	1.3	81.2%	9	$123,142	7,331
2020	7	13,198	11,706	0.61	1.3	78.5%	9	$142,307	8,521
2021	7	13,198	11,706	0.59	1.3	78.5%	9	$136,869	8,193
2022	7	13,198	11,706	0.56	1.3	78.5%	9	$95,861	5,413
2023	3	3,421	3,126	0.56	1.0	70.6%	5	$49,300	2,194
2024	3	3,421	3,120	0.65	1.0	70.6%	5	$62,237	2,518
Total	7	13,208	11,999	0.54	1.3	78.5%	--	$1,095,496	--
2024 Total:	13	56,617	49,925	0.71	1.0	92.4%	30[a]	$778,325	**42,575**
TOTAL:	23	156,031	134,016	0.68	1.2	91.2%	--	$17,386,200	--

* Weighted averages by the conservation sites' habitat acres.
** Conservation payments include sign-up incentives, restoration payments, and annual management payments.

Appendix D. Industry Participants

#	Company Name	Status	#	Company Name	Status
1	Anadarko Minerals, Inc	Active	58	M&M Exploration, Inc	Active
2	Apache Corporation (Permian)	Active	59	Magellan Midstream Partners, LP	Active
3	Bailey County Electric Cooperative	Active	60	MarkWest Oklahoma Gas Company, LLC	Active
4	Beren Corporation	Active	61	Maverick Brothers Resources, LLC	Active
5	Berexco, LLC	Active	62	Maverick Natural Resources, LLC	Active
6	BP America Production Company	Inactive	63	McGinness Oil Company of Kansas, Inc	Inactive
7	Casillas Petroleum Corporation	Active	64	Meridian Energy, Inc	Active
8	Castelli Exploration, Inc	Inactive	65	Merit Energy Company, LLC	Active
9	Central Operating, Inc	Inactive	66	Mewbourne Oil Company	Active
10	Cimarex Energy Company	Active	67	MIDCO Exploration, Inc	Active
11	Cimarex Energy Company (West TX)	Inactive	68	Midcoast Operating, LP	Inactive
12	CKenergy Electric Cooperative, Inc	Active	69	Midnight Hour, LLC	Active
13	CMX, Inc	Inactive	70	Murfin Drilling Company, Inc	Active
14	Coats Energy, Inc	Inactive	71	Northfork Electrical Cooperative	Active
15	COG Operating, LLC	Active	72	Northwestern Electric Cooperative	Active
16	Continental Resources, Inc	Active	73	O`Benco IV, LP - O`Brien Resources, LLC	Active
17	Corlena Oil Company	Active	74	OGE Corporation	Active
18	CP Bloom Wind, LLC	Inactive	75	ONE Gas, Inc	Active
19	Crawley Petroleum Corporation	Active	76	ONEOK Partners, LP	Active
20	Culbreath Oil and Gas Company, Inc	Inactive	77	Oolite Energy Corporation	Active
21	DaMar Resources, Inc	Active	78	Osage Investors, LLC	Active
22	Daystar Petroleum, Inc	Active	79	Osage Oil, LLC	Inactive
23	DCP Midstream, LLC	Active	80	Oxy Oil and Gas	Active
24	Devon Energy Corporation (KS)	Active	81	Panhandle Topeka, LLC	Active
25	Devon Energy Corporation (OK)	Active	82	Pickerell Drilling Company, Inc	Active
26	Devon Energy Corporation (Permian)	Active	83	Pintail Petroleum, Ltd	Active
27	Devon Energy Corporation (Rockies)	Active	84	Pioneer Natural Resources USA, Inc	Active
28	Devon Energy Corporation (TX)	Active	85	Plains All American Pipeline, LP	Active
29	Diehl Oil, Inc	Inactive	86	Prairie Wind Transmission, LLC	Active
30	Diversified Production LLC	Active	87	QEP Energy Company	Inactive
31	Dorchester Minerals Operating, LP	Inactive	88	Questa Energy, Corporation	Active
32	Duncan Oil Properties, Inc	Active	89	Range Production Company, LLC	Inactive
33	Edison Operating Company, LLC	Active	90	Red Oak Energy, Inc	Active
34	Edmiston Oil Company, Inc	Inactive	91	RG Exploration, LLC	Inactive
35	Elevation Resources, LLC	Active	92	Rio Petroleum, Inc	Active
36	Empire Energy E&P, LLC	Inactive	93	Samson Lone Star LLC – Samson Resources Co.	Inactive
37	Energy Alliance Company, Inc	Inactive	94	Samuel Gary Jr. & Associates, Inc	Active
38	Energy Transfer Partners, LP	Active	95	SandRidge Exploration Prod., LLC	Inactive
39	EnerVest Operating, LLC	Active	96	Scout Energy Management LLC	Active
40	Enterprise Products Operating, LLC	Active	97	Slawson Exploration Company, Inc	Active
41	Farmers Electric Cooperative	Active	98	Southern Star Central Gas Pipeline, Inc	Active
42	Fasken Oil and Ranch, Ltd	Active	99	Southwestern Public Service/Xcel Energy Inc	Inactive
43	Greenbelt Electric Cooperative	Active	100	Strand Energy, LC	Inactive
44	Griffin Management, LLC	Inactive	101	Superior Pipeline Company, LLC	Inactive
45	Imperial American Oil, Inc	Inactive	102	Tabula Rasa Partners, LLC	Inactive
46	Jayhawk Pipeline, LLC	Inactive	103	Tandem Energy Corporation	Inactive
47	JMA Energy Company, LLC	Active	104	Tapstone Energy, LLC	Active
48	John O. Farmer, Inc	Active	105	Targa Resources Corp., Subsidiaries	Inactive
49	Jolen Operating Company	Active	106	Tengasco, Inc	Inactive
50	Kenneth W. Cory, Ltd	Active	107	Texakoma Exploration Production, LLC	Active
51	Kinder Morgan, Inc	Inactive	108	Texland Petroleum, LP	Inactive
52	Kirkpatrick Oil Company, Inc	Active	109	Thomason Petroleum, Inc	Active
53	Laddex, Ltd	Inactive	110	Toto Energy, LLC	Active
54	Landmark Resources, Inc	Active	111	Triad Energy, Inc	Active
55	Lea County Electric Coop., Inc.	Inactive	112	Tri-County Electric Cooperative	Active
56	Legacy Reserves Operating, LP	Inactive	113	Unit Petroleum Company	Active
57	Lyntegar Electric Cooperative	Active	114	Upland Operating, LLC	Active

#	Company Name	Status	#	Company Name	Status
115	Viking Resources, Inc	Active			
116	Vincent Oil Corporation	Active			
117	W.R. Williams, Inc	Active			
118	Ward Petroleum Corporation	Active			
119	Western Farmers Electric Coop	Inactive			
120	White Exploration, Inc	Active			
121	Williams Midstream	Active			
122	Younger Energy Company	Active			
123	Zinszer Oil Company, Inc	Active			

Status - Companies with an 'Active' status have an executed CCAA Certificate of Inclusion (CI) with no suspension or termination. An 'Inactive' status indicates the company does not have a mitigation balance and/or enrolled assets. A 'Suspended' status indicates there is a notice of non-compliance with the terms of the CI.