

2025 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, 2026
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/ccaa/>).

RECOMMENDED CITATION

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EXECUTIVE SUMMARY

<p>5.7 million Acres Enrolled</p>	<p>Industry participants commit to implementing the CCAA conservation strategies for all oil and gas related projects on enrolled lands.</p>	<p><i>Biologically based</i></p> <p>MITIGATION FRAMEWORK</p> <p>Uniquely addresses impacts to habitat quality & quantity</p> <p style="text-align: center;">2:1 Mitigation Ratio</p> <p>Provides mitigation into perpetuity</p> <p><i>Voluntary</i></p> <p>CONSERVATION BENEFITS</p> <p>Provides conservation beyond the requirements of the permit</p> <p style="text-align: center;">Restored 10,404 Habitat Acres</p>
<p style="text-align: center;">●</p> <p style="text-align: center;"> </p> <p style="text-align: center;">●</p> <p style="text-align: center;"> </p> <p style="text-align: center;">●</p> <p style="text-align: center;"> </p> <p style="text-align: center;">●</p> <p style="text-align: center;"> </p> <p style="text-align: center;">●</p> <p style="text-align: center;"> </p> <p style="text-align: center;">●</p>	<p style="text-align: center;">CONSERVATION STRATEGY</p> <p>I. Avoid Habitat Impacts Projects exhibited an impressive 58% collocation rate with existing infrastructure to avoid new impacts to habitat.</p> <p>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.</p> <p>III. Remediate Habitat Impacts Participants may elect to restore previously impacted habitat to generate remediation credits to offset new impacts.</p> <p>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.</p>	

<p style="text-align: center;">MITIGATED IMPACTS</p> <p style="text-align: center;">19,953 Habitat Acres Impacted (cumulative since the start of the program in 2014)</p> <p style="text-align: center;">Habitat Quality = LOW Habitat Quality Score: 0.34 (range 0.0-1.0) with a stable trend of habitat quality</p> <p style="text-align: center;">Majority (76%) of impacts occur in low quality habitat (CHAT 3-4)</p> <p style="text-align: center;">Percentage of leks observed within 1.25 miles: 4% (64% of the habitat was surveyed)</p> <p style="text-align: center;">12,859 Debit Units</p>	<p style="text-align: center;">CONSERVATION OFFSET</p> <p style="text-align: center;">39,354 Habitat Acres Conserved (provided in 2025)</p> <p style="text-align: center;">Habitat Quality = HIGH Habitat Quality Score: 0.75 (range 0.0-1.0) with a trend of increased habitat quality</p> <p style="text-align: center;">Majority (98%) of conservation occurs in high quality habitat (CHAT 1-2)</p> <p style="text-align: center;">Percentage of leks observed within 1.25 miles: 80% (99% of the habitat was surveyed)</p> <p style="text-align: center;">36,626 Credit Units</p>
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● Credits Exceed Debits by 65% ●

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 follow 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. Advisory committees help inform the LPCIC by 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, 2025, to December 31, 2025.

Financial Audit

The SRF financial operations are audited annually through an independent third-party accounting firm according to Government Auditing Standards. Since the organization's establishment in 2014, there have been no material findings identified in any financial audit. The 2024-2025 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 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 2025 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, 2026). The review is publicly available on WAFWA's website (<https://wafwa.org/ccaa/>).

What's New in 2025

- August 12, 2025, the U.S. District Court for the Western District of Texas issued an order vacating the final listing rule for both the northern and southern DPSs of the lesser prairie-chicken (State of Texas, et al.). For CCAA operations, this allows the ability to open enrollment of new lands by existing Participants. All other operations and program requirements remain the same.
- The CCAA webpage changed to <https://wafwa.org/ccaa/>.

ENROLLMENT

Industry participation¹ remains high with 107 oil & gas companies committed to implementation of the CCAA's conservation strategy of avoiding, minimizing and mitigating impacts within the CCAA's covered area². See Appendix D for a listing of participants. The program was last open to new Participants in 2019, by WAFWA/SRF Executive Board decision.

Enrollment Changes in 2025:

- Eight enrollments were terminated resultant from bankruptcy or company dissolution.
- Eight companies that no longer operate in the CCAA coverage area voluntarily terminated their enrollment.

Enrolled Property (Privately Owned Lands)

The CCAA provided two enrollment options for industry Participants to address their operational needs. Participants could enroll parcels of privately-owned land on a per acre fee basis (Land Enrollment) or pay a one-time fee for oil and gas-related linear infrastructure such as pipelines 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 allows project submission anywhere within the CCAA covered area that is privately owned lands.

In 2025, enrollment in the CCAA totaled 5.7 million acres of privately owned land (Table 1). This demonstrates the oil and gas industry's commitment to the program - by voluntarily, contractual agreement - to ensure that any oil & gas related projects occurring on their enrolled lands will be mitigate 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	2,300,316	382,116	73	2,682,504	47%
Sand Sagebrush Prairie	1,857,761	99,730	0	1,957,491	34%
Shinnery Oak Prairie	576,568	185,156	0	761,725	13%
Shortgrass Prairie	275,539	36,608	0	312,147	6%
Total:	5,010,184	703,610	73	5,713,866	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 any 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 incentivizes collocation by not requiring mitigation (no fees to industry) for developing new projects in areas already impacted by infrastructure or development.

In 2025, Participants demonstrated their voluntary commitment of avoid impacts by having a 39% collocation rate. Meaning, 39% of the oil and gas projects submitted had no impact on the species or their habitat. This avoided, what could otherwise have been, habitat degradation or loss of 388 acres (Table 2). Since the start of the program, the collocation rate has been 58% which avoided impacts on 27,536 acres (Table 2). This demonstrates industry’s commitment to implementing discretionary conservation measures, 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
2025				
Mixed Grass Prairie	684	449	34%	235
Sand Sagebrush Prairie	124	86	31%	38
Shinnery Oak Prairie	155	55	64%	100
Shortgrass Prairie	35	20	43%	15
Total:	998	610	39%	388
2014-2025				
Mixed Grass Prairie	20,459	11,711	43%	8,748
Sand Sagebrush Prairie	8,396	3,877	54%	4,519
Shinnery Oak Prairie	15,260	2,105	86%	13,155
Shortgrass Prairie	3,481	2,367	32%	1,114
Total:	47,596	20,060	58%	27,536

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

Voluntary Conservation
Impacts Avoided on
27,536
Habitat Acres

Every collocated project is a conservation success!

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

⁴ Impact Acres - Potential Impact Acres not impacted by existing development.

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, 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 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 high-quality habitat is available to the public on WAFWA’s Southern Great Plains CHAT at www.sgpchat.org.

In 2025, an impressive 85% of new projects occurred outside of high-quality habitat. Since the start of the program, 76% of enrolled projects have avoided high-quality habitat. 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 CHAT 1-2	Percent CHAT 3-4
	CHAT 1	CHAT 2	CHAT 3	CHAT 4		
2025						
Mixed Grass Prairie	31	34	362	23	14%	86%
Sand Sagebrush Prairie	29	0	0	57	34%	66%
Shinnery Oak Prairie	0	0	0	55	0%	100%
Shortgrass Prairie	0	0	0	20	0%	100%
Total:	60	34	362	155	15%	85%
2014-2025						
Mixed Grass Prairie	2,423	1,370	6,184	1,734	32%	68%
Sand Sagebrush Prairie	545	0	378	2,954	14%	86%
Shinnery Oak Prairie	0	31	1,421	653	1%	99%
Shortgrass Prairie	428	86	593	1,260	22%	78%
Total:	3,397	1,487	8,576	6,601	24%	76%

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

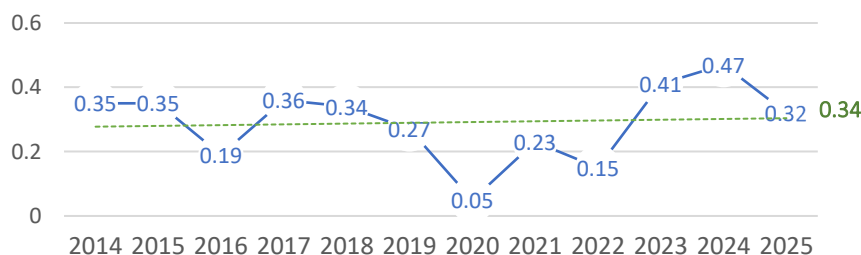
Voluntary Conservation
High Quality Habitat
76%
Avoidance Rate

II(b). By Evaluation of Habitat Conditions

Additionally, a rapid habitat assessment of each project provides a measurable and quantifiable measure of the habitat quality onsite and within 1-mile of the 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 provide a Habitat Score of 0.0 to 1.0, with 1.0 representing the highest quality habitat.

In 2025, the project impact areas (i.e., project footprint plus a buffer for indirect impacts) were determined to be of low-quality LPC habitat. The weighted average Habitat Score was 0.32 on a scale of 0.0-1.0. Since the start of the program, the Habitat Score is 0.34. This substantiates the fact that most impacts occur in areas of low-quality habitat (CHAT 3) or areas unlikely to provide habitat (CHAT 4). Refer to Appendix B for scores per ecoregion and year.

Figure 1. Habitat Quality (Habitat Score) Trend



Habitat Quality = LOW

0.34
(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) 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. Participants may use the remediation offset units they generate to offset project mitigation within the same ecoregion and CHAT Category. 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.

III (a). Remediation Credits

In 2025, there were no new remediation projects. Over the life of the program, Participants have remediated 79 acres, generating 31.70 offset units (Table 4).

Voluntary Conservation
79 Remediated
Habitat Acres

III(b). Remediation Debits

In 2025, WAFWA enrolled one project offset by remediation for 3.29 impact units (Table 4). Over the life of the program, 13.26 impact units offset by remediation (Table 4). There remains a surplus of 18.44 offset units to provide a conservation benefit until, or unless, used to offset new industry impacts.

Table 4. Remediation Ledger Summary

Ecoregion & CHAT Category	REMEDIATION (Credits)					IMPACTS (Debits)				UNIT BALANCE
	No. of Projects	Acres Restored	Habitat Score	Offset Units	No. of Projects	Impact Acres	Habitat Score	Impact Units		
2025										
Sand Sagebrush Prairie	CHAT 1	--	--	--	--	1	29	0.05	3.29	--
Total:		--	--	--	--	1	29	0.05	3.29	--
2014-2025										
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 project impacts are not 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 are easily balanced (1 Impact Unit is mitigated by 1 Offset Unit).

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) 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 2025, WAFWA enrolled 41 mitigation projects for 581 acres of potentially impacted habitat (Table 5). This added 356 Impact Units for a cumulative of 12,859 Impact Units offset annually by conservation into perpetuity (Table 5). See the Unit Ledger section for an accounting of the unit balance.

Table 5. Mitigation Ledger Summary

Ecoregion	No. of Projects	Impact Acres by CHAT Category					Impact Units
		Total	CHAT 1	CHAT 2	CHAT 3	CHAT 4	
2025							
Mixed Grass Prairie	31	449	31	34	362	23	335
Sand Sagebrush Prairie	3	57	0	0	0	57	0
Shinnery Oak Prairie	5	55	0	0	0	55	20
Shortgrass Prairie	2	20	0	0	0	20	0
Total:	41	581	31	34	362	155	356
2014-2025							
Mixed Grass Prairie	662	11,711	2,423	1,370	6,184	1,734	9,780
Sand Sagebrush Prairie	266	3,770	438	0	378	2,954	695
Shinnery Oak Prairie	488	2,105	0	31	1,421	653	1,765
Shortgrass Prairie	117	2,367	428	86	593	1,260	618
Total:	1,533	19,953	3,289	1,487	8,576	6,601	12,859

Voluntary Conservation
19,953 Mitigated
 Habitat Acres

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 the permit requirements.

Landowner Participation

In 2025, ten contracts with private Landowners secured dedicated conservation on 43,539 acres (Table 6). Secured by 10-year term agreements and permanent conservation easements through a ‘Certificate of Participation’. Enrollment into the program remains open as guided by the CCAA’s conservation strategy.

Enrollment Changes in 2025

- One new contract (CZ090) enrolled 105 acres in the Shortgrass Prairie under a 10-year agreement. This cropland restoration enrollment adjoins a larger parcel (CZ091) to provide contiguous habitat values.
- Two contracts (CZ061, CZ062) in the Shortgrass Prairie expired on September 31, 2025, releasing 2,312 enrolled acres. A portion of this expired enrollment was re-enrolled under another 10-year agreement, for a total new enrollment (CZ091) of 640 acres. Note: CZ091 was contracted late in 2025, therefore habitat benefits and credits will start to be generated in 2026.

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 2025, 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 (see the Unit Ledger).

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). An annual field review of the conservation properties determines if habitat impacts have changed on the landscape. In 2025, the review confirmed 39,354 Habitat Acres, representing 90% of the total enrolled acreage is providing LPC habitat. The remaining enrolled acres (4,185 impacted acres) serve a valuable function as a habitat buffer, and 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 2025

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	18,867	18,476	0	159	232	98%
Sand Sagebrush Prairie	1	13,934	13,934	13,737	0	0	0	100%
Shinnery Oak Prairie	2	5,370	4,607	3,032	1,521	54	0	99%
Shortgrass Prairie	3	2,418	2,142	2,055	0	88	0	96%
TOTAL:	10	43,539	39,354	37,300	1,521	301	232	98%

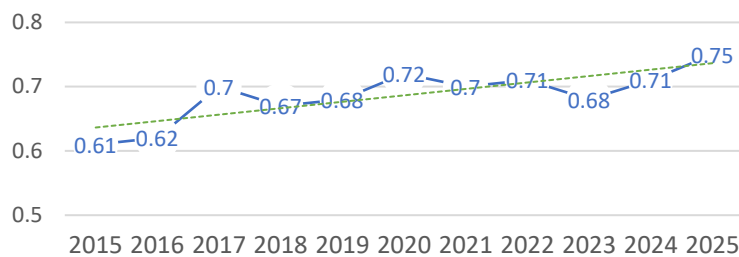
_____ 39,354 Habitat Acres Conserved _____

Habitat Conditions

A rapid habitat assessment of each conservation property provides a measurable and quantifiable measure of the habitat quality onsite and within 1-mile of the 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 provide 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 sites have the characteristics to achieve a 1.0 score, due to the natural ecology of the site. Therefore, each property is uniquely managed to reach its highest potential.

In 2025, the conservation properties demonstrate providing high quality habitat with a weighted average HEG score was 0.75 on a scale of 0.0-1.0 (Fig. 4). This shows a consistent, increasing trend in quality over time. Refer to Appendix C for Habitat HEG scores per ecoregion and year, and Table 8 for scores by conservation property.

Figure 4. Habitat Quality (Habitat Score) Trend



Habitat Quality = HIGH

0.75
(0.00-1.00)

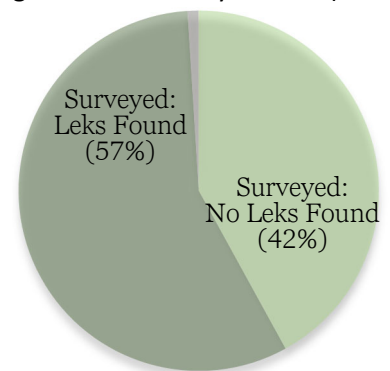
Habitat is of higher quality than the land it offsets

Lek Occurrence

WAFWA and our partnering state wildlife agencies voluntarily conduct ground-based, LPC lek surveys on the conservation properties following WAFWA-approved protocols (posted online at <https://wafwa.org/ccaa/>). This voluntary action helps inform the implementation of conservation measures. Specifically, those pertaining to addressing disturbances in the vicinity of active leks during the breeding season (March 1 – July 15). The results further demonstrate that the CCAA conservation properties are providing high-quality habitat and utilized by the lesser prairie-chicken.

In 2025, 99% of the enrolled acres were surveyed. The surveys identified 18 active leks⁵ onsite, with another 18 active leks located within a 1.25-mile radius (Table 8). The surveys identified that 8 of the 10 projects surveyed had one or more active leks within a 1.25-mile radius (80% occurrence rate). Refer to Appendix C for results per ecoregion/year.

Figure 5. Lek Survey Results (2025)



Conserved
18
Lesser Prairie
Chicken Leks

Active Lek
80%
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 lessee 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 permit requirements.

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 2025, WAFWA contracted for 105 acres of cropland restoration to native range on a newly enrolled property (CZ090), and 500 acres of light, shinnery oak suppression in Shinnery Oak Prairie (CZ089). Additionally, there were 45,565 acres enhanced by grazing management in 2025.

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
2025				
Mixed Grass Prairie	21,818	0	0	0
Sand Sagebrush Prairie	13,934	0	0	0
Shinnery Oak Prairie	5,370	500	0	0
Shortgrass Prairie	2,418	0	0	105
2025 Total:	45,565	500	0	105
2014-2025				
Mixed Grass Prairie	76,627	0	2,873	0
Sand Sagebrush Prairie	26,509	0	0	0
Shinnery Oak Prairie	20,802	9,631	6,176	629
Shortgrass Prairie	12,578	0	0	725
TOTAL:	136,516	9,631	9,049	1,355

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

*Voluntary
Conservation Benefit*

10,404 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 2025, conservation efforts on 39,354 habitat acres generated 36,626 offset units (Table 8).

Table 8. Conservation efforts to generate the 2025 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	15,987	0.91	1.0	96.3%	0	0	17,984
CZ063	Permanent	--	Range	1,758	1,740	0.72	1.0	98.4%	0	3	1,535
CZ065	Permanent	--	Range	968	968	0.90	1.0	85.0%	1	1	1,091
CZ066	10 Years	09/30/26	Range	172	172	0.90	1.0	81.5%	0	2	194
				21,818	18,867	0.89	1.0	95.8%	1	6	20,804
Sand Sagebrush Prairie											
CZ088	Permanent	--	Range	13,934	13,737	0.62	1.0	89.1%	11	6	10,659
				13,934	13,737	0.62	1.0	89.1%	11	6	10,659
Shinnery Oak Prairie											
CZ026	Permanent	--	Range	1,554	1,217	0.66	1.0	91.1%	0	1	941
CZ089	10 Years	09/30/34	Range	3,815	3,390	0.67	1.0	94.5%	4	3	2,698
				5,370	4,607	0.67	1.0	93.6%	4	4	3,639
Shortgrass Prairie											
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
CZ090	10 Years	09/30/35	Grass	105	88	0.13	3.0	47.3%	-	-	10
				2,418	2,142	0.57	1.1	62.6%	2	2	1,524
Total in 2025:				43,539	39,354	0.75	1.0	91.4%	18	18	36,626

* 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

45%
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 2025, more than 45% of offset units came from permanent conservation easements, surpassing the goal. This permanency of conservation contributes further to the voluntary conservation benefit of the species.

UNIT LEDGER

A data management system designed specifically for the CCAA monitors transactions in real time, ensuring privacy and allowing precise tracking and accountability of both impact units (debits) and offset units (credits).

- The tracking ledger ensures impact units are debited from the same ecoregion in which they occurred and credited in an equal or higher CHAT category. That is, mitigated impacts offset by conservation properties of equal or higher habitat quality.

Ledger Summary

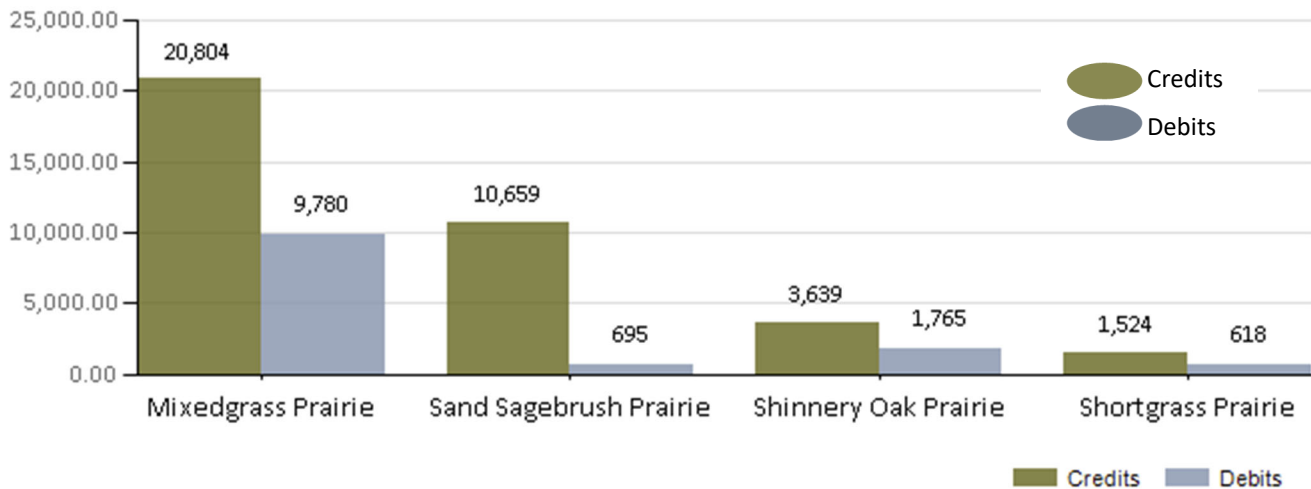
As of December 31, 2025, the credits generated exceeded the debits needed for each of the four ecoregions (table 9). Just 35% of the available credits were used, as shown in Table 9. The remaining credits will be transferred to 2026 and can be utilized for mitigation until July 31, 2026. At which point, any unused credits will expire, and the credits generated in 2026 will be applied to the ledger. This low credit utilization rate 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	20,804	-9,780	11,023	47%
Sand Sagebrush Prairie	10,659	-695	9,964	7%
Shinnery Oak Prairie	3,639	-1,765	1,874	49%
Shortgrass Prairie	1,524	-618	906	41%
2025 TOTAL:	36,626	-12,859	23,767	35%

35%
Low Credit Utilization Rate =
High Conservation Benefit

YEAR-END LEDGER BALANCE



Conservation Efforts are Greater than Impacts

Credits Exceed Debits
by 23,767 Credits

by **65%**

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 2025 financial audit and accompanying IRS form 990 provides findings that the CCAA is financially sustainable at its current rate of use to carry out its 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 2025, the SRF paid \$743,841 in habitat conservation payments to CCAA enrolled private landowners for implementing the terms of their CCAA Certificate of Participation. Since the start of the program, \$20.1 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
2025	\$440	\$42,971	--	\$621,316	\$79,114	\$743,841
Total:	\$613,602	\$2,325,697	\$1,958,069	\$12,787,058	\$2,403,685	\$20,088,109

\$20.1M
Conservation Expenditures

Financial Partnership Contributions

Beginning in 2021, owners of two properties with permanent conservation easements (CZ088 and CZ026) voluntarily gave up their annual conservation payments. This contribution guarantees that more than fifteen thousand acres of habitat will be permanently protected for the species, with no additional cost in the future.

Administrative Fund Expenditures

The CCAA operates under a voluntary, annual administrative budget of \$610,000. The 2021 Business Plan established a budget to provide staffing to manage the CCAA, contract support, insurance, software/licensing and other operational costs. As part of the CCAA’s adaptive management process (Business Plan, Section 4.5), an adjustment for the cost of inflation increased the budget effective July 1, 2025. The CCAA’s Business Plan’s annual administrative budget changed from \$500,000 to \$610,000. In 2025, the total administrative expenditure was \$501,887 (Financial Statements 2025).

Industry Paid Mitigation Fees

In 2025, Participants paid \$577,706 in mitigation fees for projects enrolled (Appendix B). The majority of the fees paid were by payment from the prepaid balance of the Participant’s Habitat Conservation Fund Account.

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:

$$\begin{aligned} &(((\text{Conservation Cost} \times 20\% \text{ Buffer}) \times \text{Endowment Multiplier of 20}) \\ &\quad \times \text{1-Yr. Conservation Reserve}) + \text{Administrative Fund Reserve} \end{aligned}$$

As of December 31st, 2025, the CCAA investment totaled \$49,653,729, demonstrating the CCAA investments were safely above the Sustained Investment Standard of \$28,744,803. 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 = \$28,744,803
2025 Investment Total = \$49,653,729

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. Certain avoidance and minimization measures are mandatory, while others may be implemented at the Participant's discretion. 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

Each year, WAFWA randomly reviews projects onsite to verify that conservation measures are implemented. Projects eligible for review include constructed projects and where the project has not been previously reviewed within the last three years. Of eligible projects to review, a random selection is made of up to 50 projects per ecoregion. 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.

In 2025, all reviewed industry projects were found to be in compliance with the terms of their enrollment. The random sample resulted in 41 projects to be reviewed. Sixteen (16) projects were not yet constructed and were deferred to the 2026 compliance season. One project was a dry hole. Of the resulting 24 projects reviewed, all were found to be implementing the required conservation measures, see table below.

Table 11. Industry Compliance (2025)

Compliance Review Questions	No. of Responses		
	YES	NO	N/A
Is the location of the project mapped accurately within CCAA standards?	24	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.	24	0	--
Is there sufficient evidence that the breeding season (March 1 and July 15) restrictions are being followed?	24	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	24
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	24
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	24
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	24
If a transmission project, are all poles in CHAT 1-3 monopole?	0	0	24
Were there any compliance issues found?	0	24	--

*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 2025, 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 2025, WAFWA identified 10 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 addressed with the participant and agreed that we'd utilize his remaining pre-paid fees to cover the cost then provide the company with a voluntary termination. This company currently has a 'Suspended' enrollment.

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 2025, 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 2025, 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 2025, 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 2025, the acres impacted through the CCAA total 19,953 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.

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- WAFWA, 2025. Financial Statements. Western Association of Fish and Wildlife Agencies. Boise, Idaho.
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APPENDICES

Appendix A. Running Ledger of Mitigation Debits to Credits

LEDGER - Mixed Grass Prairie

	YEAR-END BALANCE		
	Credits	Debits	Balance
2014	4,542	-2,638	1,904
2015	28,820	-10,006	18,814
2016	40,042	-7,352	32,690
2017	56,409	-8,293	48,116
2018	55,380	-8,513	46,867
2019	54,325	-8,651	45,674
2020	57,361	-8,651	48,710
2021	56,091	-8,652	47,439
2022	29,474	-8,683	20,821
2023	20,266	-8,756	11,510
2024	20,570	-9,446	11,124
2025	20,804	-9,780	11,023

LEDGER - Sand Sagebrush Prairie

	YEAR-END BALANCE		
	Credits	Debits	Balance
2014		-9	(9)
2015	8,488	-868	7,620
2016	8,385	-613	7,772
2017	8,607	-675	7,932
2018	8,552	-689	7,863
2019	8,379	-720	7,659
2020	9,032	-726	8,307
2021	8,682	-646	8,036
2022	12,743	-653	12,089
2023	10,479	-667	9,812
2024	11,600	-695	10,905
2025	10,659	-695	9,964

LEDGER - Shinnery Oak Prairie

	YEAR-END BALANCE		
	Credits	Debits	Balance
2014	288	-162	126
2015	10,060	-1,701	8,358
2016	7,649	-1,431	6,218
2017	8,881	-1,636	7,245
2018	7,637	-1,768	5,868
2019	8,238	-1,831	6,407
2020	8,744	-1,845	6,899
2021	7,512	-1,366	6,146
2022	7,702	-1,320	6,382
2023	6,447	-1,733	4,715
2024	7,886	-1,745	6,141
2025	3,639	-1,765	1,874

LEDGER - Shortgrass Prairie

	YEAR-END BALANCE		
	Credits	Debits	Balance
2014	147	-378	-231
2015	1,994	-805	1,188
2016	3,928	-526	3,402
2017	7,847	-522	7,325
2018	7,377	-667	6,710
2019	7,331	-667	6,664
2020	8,521	-667	7,854
2021	8,193	-631	7,562
2022	5,413	-618	4,794
2023	2,194	-618	1,575
2024	2,518	-618	1,900
2025	1,524	-618	906

Appendix B. Industry Impact by Year (2014-2025)

Mitigation. Summary of all mitigated impacts addressed in the CCAA.

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	301	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
2025	31	684	449	0.40	2.8	85.8%	0	\$553,802	335	9,780
Total	662	20,459	11,711	0.43	2.6	84.6%	26	\$13,261,439	9,780	9,780
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	7	236	61	0.07	3.3	23.9%	0	\$4,682	8	653
2023	11	341	186	0.05	3.7	24.7%	0	\$10,263	14	667
2024	8	248	83	0.21	4.0	31.7%	0	\$21,769	28	695
2025	3	93	57	0.01	4.0	3.3%	0	\$302	0	695
Total	266	8,191	3,770	0.11	3.6	18.0%	2	\$381,894	695	695
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	--	--	--	--	\$0	0	1,315
2022	4	98	4	0.67	3.5	77.5%	0	\$4,871	5	1,320
2023	23	870	391	0.60	3.1	80.5%	0	\$448,051	412	1,733
2024	4	124	8	1.0	4.0	95.5%	0	\$14,366	12	1,745
2025	5	155	55	0.26	4.0	56.7%	0	\$23,601	20	1,765
Total	488	15,260	2,150	0.45	3.3	70.9%	0	\$1,666,160	1,765	1,765
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

2025	2	35	20	0.00	4.0	0.0%	0	\$0	0	618
Total	117	3,481	2,367	0.21	3.1	38.5%	10	\$516,790	618	618
2025 Total:	41	967	581	0.34	3.1	72.0%	0	\$577,706	356	12,859
TOTAL:	1,533	47,391	19,953	0.35	2.9	65.1%	38	\$15,826,283	12,859	12,859

* Weighted averages by the sites' evaluation units.

Remediation. Summary of all remediated impacts addressed in the CCAA.

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										
--	--	--	--	--	--	--	--	--	--	--
Total										
Sand Sagebrush Prairie										
2022	2	81	33	0.08	1.0	28.0%	0	\$0	8	8
2023	2	62	35	0.03	1.0	36.2%	0	\$0	2	9
2024	1	31	10	0.16	1.0	31.9%	0	\$0	1	10
2025	1	31	29	0.05	1.0	16.3%	0	\$0	3	13
Total	6	205	107	0.07	1.0	27.9%	0	\$0	13	13
Shinnery Oak Prairie										
--	--	--	--	--	--	--	--	--	--	--
Total										
Shortgrass Prairie										
--	--	--	--	--	--	--	--	--	--	--
Total										
2025 Total:	1	31	29	0.05	1.0	16.3%	0	\$0	3	13
TOTAL:	6	205	107	0.07	1.0	27.9%	0	\$0	13	13

* Weighted averages by the sites' evaluation units.

Appendix C. Conservation by Year (2014-2025)

Year	# of Contracts	Enrolled Acres	Habitat Acres	Habitat Score*	CHAT Score*	% Suitable Habitat*	Leks on or 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
2025	4	21,818	18,867	0.89	1.0	95.8%	7	\$628,536	20,804
Total	9	78,986	66,734	0.75	1.4	94.0%	--	\$11,644,357	<i>Expire Annually</i>
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
2025	1	13,934	13,737	0.62	1.0	89.1%	17	\$0	10,659
Total	2	42,315	37,910	0.68	1.0	88.2%	--	\$2,608,269	<i>Expire Annually</i>
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
2025	2	5,370	4,607	0.67	1.0	93.6%	8	\$29,979	3,639
Total	5	21,522	17,374	0.53	1.0	93.6%	--	\$2,696,591	<i>Expire Annually</i>

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CONT. Appendix C. Conservation by Year (2014-2025)

Year	# of Contracts	Enrolled Acres	Habitat Acres	Habitat Score*	CHAT Score*	% Suitable Habitat*	Leks on or w/in 1.25 mi	Conservation Payments**	Credit Units
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
2025	3	2,418	2,142	0.57	1.1	62.6%	4	\$41,916	1,524
Total	8	13,313	12,087	0.54	1.3	78.2%	--	\$1,137,412	<i>Expire Annually</i>
2025 Total:	10			0.75	1.0	91.4%	36	\$700,430	36,626
TOTAL:	24	156,137	134,137	0.69	1.2	91.2%	--	\$18,086,630	<i>Expire Annually</i>

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