

**U.S. Department of Agriculture  
Forest Service  
White River National Forest  
Supervisor's Office  
900 Grand Avenue / P.O. Box 948  
Glenwood Springs, CO 81602**

**Statutory Categorical Exclusion Determination and Decision Document**  
*2008 WillSource Enterprise 1-13 Compressor and Pipeline Burial Statutory Categorical Exclusion  
CO-140-2008-118 SCE*

**Introduction:** WillSource Enterprise, LLC, proposes to install a compressor with related facilities on the existing WillSource 1-13 well pad and bury sections of two existing pipelines located on the White River National Forest. WillSource drilled the 1-13 well in 2001 and re-entered to deepen the 1-13 in 2004, the 1-20 well was also drilled in 2004. WillSource has had these wells shut-in until pipelines and compression facilities could be installed. In 2005 WillSource installed two steel pipelines (one for water and one for gas) running from the 1-20 location to the existing Gunnison pipeline with a tie-in at the 1-13 and a future tie-in for the 1-17. In 2007 WillSource constructed the 1-17 well location, re-constructed the access road and installed the water and gas pipelines running from the 1-20 future tie-in to the 1-17 well location. WillSource currently has an approved Sundry Notice for a temporary surface line running to an Encana take-away and has a temporary contract with Gunnison Pipeline to transport gas. The compressor is needed to deliver the gas to either the Gunnison pipeline or through the surface pipeline. These facilities would process fluid minerals from WillSource leases to transfer lines for public consumption. No new surface disturbance is anticipated to accommodate the facilities on the 1-13 well pad.

**Location:** Township 9 South, Range 91West, Section 13, NWSE, 6<sup>th</sup> PM, Mesa County, Colorado

**Proposed Action:** The proposed new compressor and related facilities such as a dehydrator, separator and tanks would be located on the existing WillSource 1-13 well pad, resulting in no new surface disturbance. The existing WillSource 1-13 pad was constructed in 2000 and has one shut-in natural gas well on the location. The pad is accessed and adjacent to Forest Service Road (FSR) 800. See attached project map. This proposal also includes burying a section of two existing surface pipelines across West Divide creek. These pipelines were constructed and buried in 2005 with a short section at West Divide creek crossing on the surface. Both pipelines would be buried in the same trench of approximately 60 feet in length.

**Lease Stipulations and Conditions of Approval:** The proposed action is in conformance with all the stipulations attached to Federal Lease COC 58839. Conditions of Approval (COAs) for the Sundry Notice's, by which WillSource requested authorization to use the existing 1-13 pad as the location for a compressor and associated facilities, and burying the section of two pipelines (the proposed action), are attached to this Decision Document.

**Applicable SCE:** The following category of categorical exclusions pursuant to Section 390 of the Energy Policy Act of 2005 applies to this proposal:

*Category 1: Individual surface disturbance of less than five (5) acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to NEPA has been previously completed.*

Category 4: *Placement of a pipeline in an approved right-of-way corridor, so long as the corridor was approved within five (5) years prior to the date of placement of the pipeline.*

**Rationale for Use of SCE:** The applicable factors for review in determining applicability for use pursuant to Section 390 Category 1 and 4 are the following five criteria, as explained in further detail below: (1) individual five acre disturbance threshold, (2) 150 acre un-reclaimed disturbance limit, (3) site specific analysis of oil or gas exploration/development in a NEPA document, (4) placement of a pipeline in an existing corridor, and (5) placement of a pipe within 5 years of approval or amendment.

1. Individual 5-acre disturbance threshold: The project would be limited entirely to an existing well pad.
2. 150-acre unreclaimed disturbance limit: The existing oil and gas disturbance on lease COC58839 consists solely of the 1-13 well pad, which occupies a total of 1 acre.
3. Site-specific analysis of oil or gas exploration/development in a NEPA document: The proposed location underwent NEPA analysis and completion of a Forest Service Handbook CE signed on June 27, 2000.
4. Placement of a pipeline in an existing corridor: The pipelines would be limited entirely to their existing corridor.
5. Placement of a pipe within 5 years of approval or amendment: Approval of the Sundry Notice to construct and bury these pipelines was August 2005 with construction occurring in 2005, the Decision Notice and Finding of No Significant Impact was signed in November 2003.

**Additional Information:** Air emissions from oil and gas development, including compressors, on National Forest System lands within the BLM Glenwood Springs Field Office boundaries—including the WillSource 1-13 location, were addressed in the BLM's Roan Plateau Planning Area Resource Management Plan Amendment and Environmental Impact Statement. Environmental assessments conducted by the White River National Forest for similar or larger compressor facilities on NFS lands have consistently resulted in a finding of no significant impact relative to air quality.

**Decision:** In review of the project proposal for the compressor and associated facilities at the existing WillSource 1-13 location, the burial of a section of two existing pipelines, the COAs to be attached to the Sundry Notice's, Section 390 requirements of the Energy Policy Act of 2005, along with other applicable laws and regulations, I find that:

1. The proposed project conforms to the requirements for approval pursuant to SCE Category 1 and 4.
2. Air emissions have been adequately addressed in an existing NEPA analysis.
3. NEPA documentation has been previously prepared, and no further NEPA is required.

Further, approving the proposed action is consistent with the White River National Forest Land and Resource Management Plan; federal oil and gas lease terms, conditions and stipulations; and the Mineral Leasing Act of 1920, as amended by the Federal On Shore Oil and Gas Leasing Reform Act of 1987; and implementing regulations at 36 CFR 228, Subpart E.

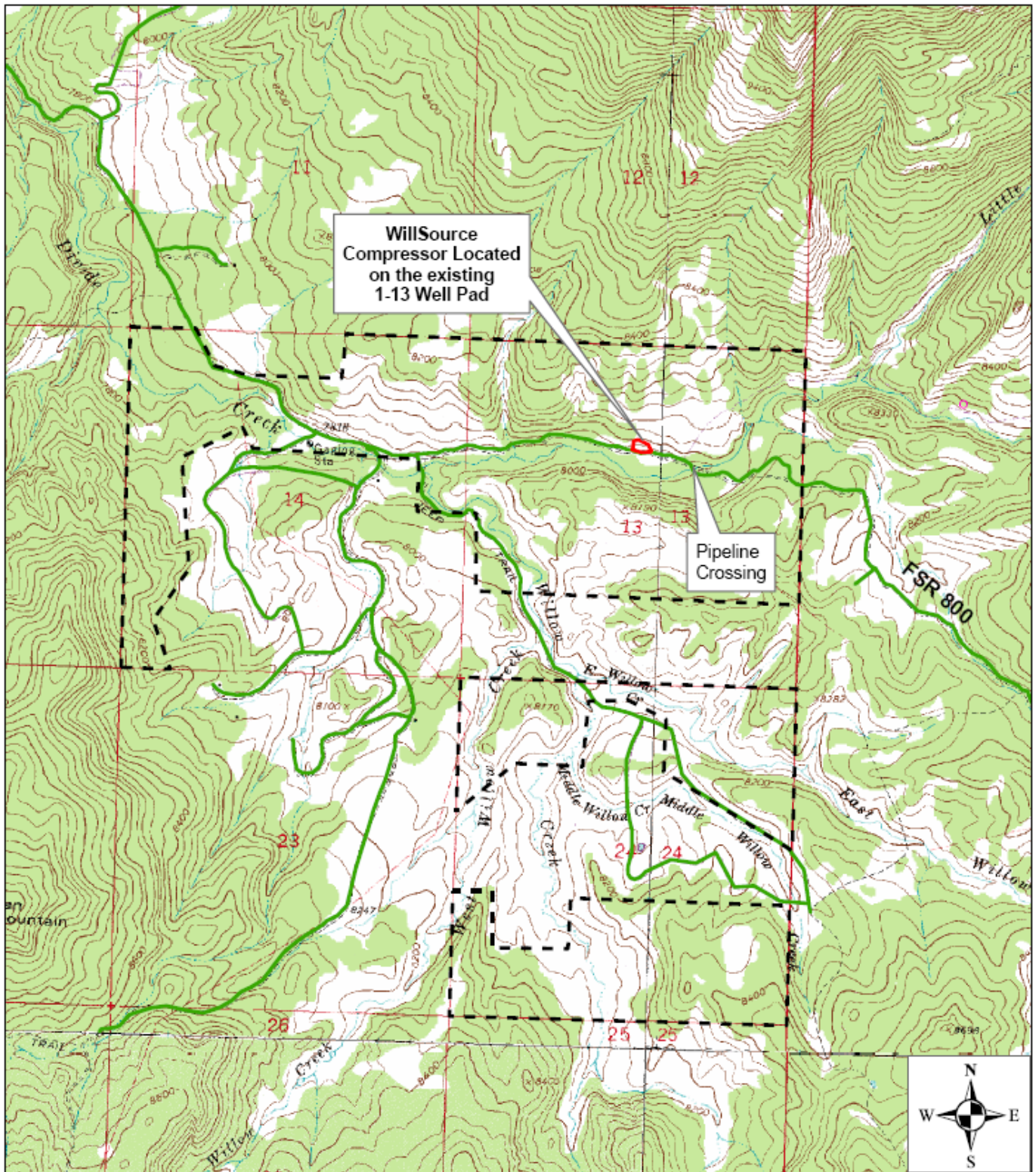
Therefore, it is my decision to approve the proposed construction with the attached conditions of approval of a compressor and associated facilities on the existing WillSource 1-13 well pad and burial of a section of two pipelines through West Divide creek. The Conditions of Approval are identified under authority given 36 CFR 228.107(2)(ii), and are attached.

*Mary Morgan*

Mary Morgan  
Forest Supervisor  
White River National Forest

*10-7-08*

Date



T9S, R91W, Sec. 13, 6th PM, Mesa County, Colorado  
 White River National Forest Surface

2,000 1,000 0 2,000 Feet

Lease COC-058839 - - -

Figure 1. Existing WillSource 1-13 Pad and Pipeline Crossing Locations

## Surface Use Conditions of Approval

Operator Name and Well Number: WillSource, Compressor Facilities on the 1-13, burial of pipelines  
Legal Description at Surface: T9S, R91W, Section 13

**Administrative Notification:** At least 48 hours prior to construction, the operator shall notify the Forest Service representative of construction startup plans.

### **Well Pad, Production Facilities, and Pipelines**

1. The compressor(s), generator(s) and pump(s) shall be installed and operated at the site in a manner that, as a minimum, meets the Colorado Oil and Gas Conservation Commission's Noise Abatement regulation (No. 802) for Residential/Agricultural/Rural Zone which, in summary, requires a noise level not to exceed 50 db(A) between 7:00 pm and 7:00 am from a measurement distance of 350 feet from the noise source.
2. The compressor(s), generator(s), and pump(s) shall NOT be installed prior to receipt by the Operator of a construction permit from Colorado Department of Public Health and Environment – Air Pollution Control Division (APCD) air quality standards. Following installation, WillSource shall operate and maintain the facility in compliance with Prevention of Significant Deterioration (PSD) Increments and National Ambient Air Quality Standards (NAAQS) as applied and enforced by the APCD, and any additional emission or air quality standards that may be established by the APCD.
3. The paint color to be used on all surface facilities including the metal containment rings surrounding tank batteries, pipeline risers and gate installations is Shale Green (5Y 4/2).
4. If well production is established, WillSource and/or its operators will submit a diagram to the Forest Service showing the proposed compressor and production facilities.
5. All production tanks will be constructed of fiberglass or metal and will be fenced or covered to prevent wildlife access. Containment rings or berms will be placed around all tanks to contain at least 110 percent of tank capacity, and will be compacted and gravel surfaced (if determined necessary by the Forest Service).
6. All internal combustion engines associated with production facilities will be equipped with approved noise-reducing spark arresting mufflers.
7. If technically feasible/available (i.e., available cell coverage), the Operator will be required to set up production equipment with telemetric monitoring devices to help minimize winter travel.
8. The Operator must ensure that the active work areas are sufficiently secured and marked (e.g., moveable barricades signed with reflective safety material) at the end of each day to avoid accidents with the public. Such barricades must be placed in locations that allow an unsuspecting driver sufficient reaction time to stop.
9. Following pipeline installation, the Operator will be responsible for completely reconstructing Forest Service access roads to Forest Service standards identified in the road design and plans package previously approved.

10. Construction activities at perennial stream crossings shall occur during low-flow conditions (i.e. late summer/early fall) and shall consist of either a piped stream diversion or the use of a coffer dam and pump to divert flow around the disturbed area. The Operator will notify the Authorized Officer and obtain consent at least 48 hours prior to installation during an allowable timeframe of a low stream flow condition.

Pipeline installation beneath stream crossings shall consist of burying the pipeline at a minimum depth of 4 feet below channel substrate. Following burial, the channel grade and substrate composition shall be returned to pre-construction conditions.

The Operator shall obtain verification of nationwide general permit applicability from the U.S. Corps of Engineers prior to construction activities at stream crossings. Previous verification by the U.S. Corps of Engineers expired on March 18, 2007. In addition to obtaining permit verification, the operator shall comply to all conditions in the U.S. Corps of Engineers verification letter.

11. The pipeline trench must be sufficiently compacted during and following backfilling to prevent settling or the creation of a trough that could channel water. All roadside ditches will be reestablished following compaction.

### **Misc. General Requirements**

1. For winter activities over the long-term life of the well (s), the operator will be required to access the well (s) via snowmobile or snowcat. Except under emergency situations and approved by the Forest Service Authorized Officer, snow plowing is prohibited. WillSource and/or its operators must have all work associated with this project completed prior to December 1 and start-up would not be allowed until after April 1 each year. While the Forest Service may consider requests for an exception, in years of light snowpack, WillSource should not plan on exceptions being granted. WillSource would have to provide the Forest Service a written agreement between WillSource and the local snowmobile club before the Forest Service would consider changing this COA.
2. The operator shall regularly monitor and promptly control noxious weeds or other undesirable plant species as set forth in the Glenwood Springs Energy Office *Noxious and Invasive Weed Management Plan for Oil and Gas Operators*, dated March 2007. A Pesticide Use Proposal (PUP) must be approved by the Forest Service prior to the use of herbicides. Annual weed monitoring reports shall be submitted by **December 31**. Contact Beth Brenneman, Glenwood Springs Energy Office Ecologist, at 970-947-5232 or beth\_brenneman@blm.gov.
3. All vehicles and equipment that have extensive contact with the ground (e.g., track hoes and trailers) will require power washing prior to entering the project area the first time, and as necessary (i.e., if they acquire new dirt or mud while off the National Forest) prior to subsequent trips. Following cleaning, the operator or subcontractor must arrange to have equipment inspected by the Forest Service in the town of Rifle or Silt.
4. WillSource or its contractors will be responsible for fire prevention and suppression. These requirements for operations on Forest Service lands are found in the attachment titled "Fire Precautions."
5. WillSource and/or its operators will coordinate with the appropriate County, State, and Federal government agencies for obtaining all appropriate permits (e.g., road use, air quality etc.). Per Garfield County's request, WillSource and/or its operators must post the appropriate road bond with the County

Road and Bridge Department and comply with posted weight limits and/or overweight permit requirements. WillSource and/or its operators will be required to maintain and have any applicable permits on site and/or in their files throughout the life of the project. WillSource and/or its operators will be required to provide the Forest Service with any copies of required permits upon Forest Service request. Operations may be shut down if these are not provided within 3 days of request.

6. WillSource shall provide the Forest a Spill Prevention Control and Countermeasure Plan or similar document which conforms to the requirements of 40 CFR 112. Additionally, it must be tailored to this project to outline WillSource's or their operators' procedures for notification (i.e., who from construction, drilling, completion, etc. crews will be responsible for contacting the authorized Forest Service officer) cleanup, and disposal of chemical or hydrocarbon spills of any kind. Upon occurrence of a spill (production water, oil, fuel, or other chemicals) or pipeline leak, the operator shall take immediate containment and cleanup action and notify the Forest Officer at the earliest opportunity (it is possible for the sheriff's office to make quick contact, if necessary).
7. Fire Restrictions. The operator will comply with any fire restrictions in effect at the time of proposed operations. The Forest Service reserves the right to suspend operations during periods of high fire potential. Forest Service will provide the operator as much advance notice of anticipated closure orders as possible.
8. Fire Prevention. Fire extinguishers, at least 5 pounds ABC with an Underwriters Laboratory rating of 3A-40BC or greater, will be on or near each internal combustion engine used in association with this activity.
9. Spark Arresters. All gasoline, diesel and steam-powered equipment must be equipped with effective spark arresters or mufflers. Spark arresters must meet Forest Service specifications discussed in the General Purpose and Locomotive (GP/L) Spark Arrester Guide, Volume 1, April, 1988; and Multi-position Small Engine (MSE) Spark Arrester Guide, April, 1989. In addition, all electrical equipment must be properly insulated to prevent sparks.
10. Fire Reporting. Fires shall be reported to the Forest Service as soon as possible. The operator shall be held responsible for damage and suppression costs for fires started as a result of operations to the extent permitted by state and federal law.
11. Project employees shall be prohibited from carrying firearms or bringing dogs to the project area.