

U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson Street
Craig, CO 81625

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: CO-100-2007-032 DNA

CASEFILE/PROJECT NUMBER: COC58293 (Amendment)

PROJECT NAME: Duncan 3-5 Well Natural Gas Pipeline

LEGAL DESCRIPTION: T.12N., R.100W., Sec. 18, Lot 9, 6th PM Moffat County (see Attachment A)

APPLICANT: Questar Gas Management

A. Describe the Proposed Action

The proposed action is to approve an amendment to right-of-way (ROW) grant COC58293 to allow Questar Gas Management to construct a natural gas pipeline on public land from the Duncan 3-5 Well to a tie-in point on an existing pipeline ROW. The proposed pipeline would be located west of the old Hiawatha Camp Site, Moffat County, Colorado. The approximate date work would start is summer 2007 and the estimated duration of construction is three days.

Questar plans to install a 4½-inch O.D. natural gas pipeline beginning at the Duncan 3-5 well located in Lot 9, Section 18, thence approximately 508 feet south and tie into existing Questar pipeline right-of-way COC58293. The pipeline parallels the well access road and would cross an existing access road. Total surface disturbance would be less than 1 acre.

The requested temporary construction width is 50 feet, reverting to a 30-foot wide corridor 3 years after construction. The corridor would be cleared of vegetation and obstacles, with surface disturbance limited to that required to ensure a safe work area for equipment and workers. A backhoe or track hoe would be used to excavate the trench to a width of 20 inches. Trench spoils would be wind-rowed on the opposite side of the pipeline trench. The pipeline would be buried 30 inches deep as measured from the top of the pipe. Any road crossings would be buried to a minimum depth of 48 inches below the borrow area. Material Safety Data Sheets would be available for all chemicals, compounds and/or substances used during construction and production operations. Water bars would be installed as needed on the right-of-way. Above-ground facilities not subject to safety requirements would be painted Shale Green. All disturbed areas would be re-contoured and seeded with an approved mix. All disturbances would be maintained relatively weed-free for the life of the project through implementation of a noxious weed monitoring and eradication program.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Resource Management Plan and Record of Decision (ROD)

Date Approved: April 26, 1989

- Draft RMP/EIS February 1986
- Final RMP/EIS September 1986
- Colorado Oil and Gas Leasing and Development Final EIS January 1991

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

CO-016-95-066 Administrative Determination Review, Pipeline ROW COC58293, July 18, 1995

CO-100-LS-03-031 EA, Duncan 3-4, 2-5 and 3-5 Wells, August 4, 2003

CO-100-2006-072 CX, Section 390 CX for Duncan 3-5 Well, May 22, 2006

Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Environmental Assessment, March 1997.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

Yes, the current proposed action is substantially the same action as previously analyzed. The project area was specifically analyzed for wells and access roads in the existing NEPA documents and the proposed pipeline parallels the existing well access road.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Yes, the alternatives analyzed in existing NEPA documents are appropriate for the current proposed action. No new alternatives have been proposed to address additional issues or concerns. No new information has been identified that requires change or consideration of new alternatives.

3. Is the existing analysis valid in light of any new information or circumstances?

Yes. The proposed action would have no disproportionate impacts on minority populations or low-income communities (E.O. 12898) and is in compliance with the President's Executive Order, signed 1/10/01, which mandates evaluation of effects of actions and agency plans on migratory birds.

Resource conditions continue to meet objectives and goals. No new, threatened or endangered plant or animal species have been identified on the site. The surface disturbing activities associated with pipeline installation will create an environment and provide a mode of transport

for invasive species and other noxious weeds to spread. Required mitigation attached as Attachment B, stipulations to minimize disturbance, utilize interim reclamation techniques and control noxious weeds will reduce the potential for long- term infestations of annual and noxious weed species. A Class III cultural resource block inventory was conducted for the are of the proposed action in 2002 (see Attachment C). The raptor nest buffer zone stipulation incorporated into the original ROW grant applies to the proposed action (see Attachment D). Data reaffirms that the NEPA documentation identified all resource concerns for the affected environment. The proposed action will not adversely affect Public Land Health Standards.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes. The previous EA’s and other NEPA documents were prepared between 1995 and 2006. No new procedural or analytical processes have been adopted since the previous analyses were conducted.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Direct and indirect impacts of the current proposed action are not significantly different from those identified in the existing NEPA documents and the proposed action would not change the previous analysis of impacts.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes, the actual cumulative impacts are well within the parameters addressed. To date, the amount of surface disturbance on public land has been less than predicted and added to past, present, and reasonably foreseeable actions of BLM and others, the impact prediction remains accurate. Implementing the proposed action will not substantially change the cumulative impact analysis.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Extensive public outreach through scoping and involvement of the public and other agencies occurred in the development of existing NEPA documents. No new interested parties have been identified that have any concerns with the proposed action.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented	Initials/Date
Barb Blackstun	Natural Resource Specialist	Air Quality, Floodplains, Prime/Unique Farmlands, Surface Water Quality	BB 1/26/07

Robyn Morris	Archaeologist	Cultural Resources, Native American Concerns	RWM 1/25/07
Mike Andrews	Realty Specialist	Environmental Justice	MAA 1/22/07
Ole Olsen	Natural Resource Specialist	Invasive Non-native Species	OO 1/26/07
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS 1/23/07
Tim Novotny	Wildlife Biologist	T&E Animal	TN 1/23/07
Jennifer Maiolo	Mining Engineer	Ground Water Quality	JAM 1/29/07
Tim Novotny	Wildlife Biologist	Wetlands/Riparian Zones	TN 1/23/07
Jim McBrayer	Outdoor Recreation Specialist	WSA, W&S Rivers	JDM 1/29/07

STANDARDS:

Name	Title	Standard	Initials/Date
Tim Novotny	Wildlife Biologist	Animal Communities	TN 1/23/07
Tim Novotny	Wildlife Biologist	Special Status, T&E Animal	TN 1/23/07
Hunter Seim	Rangeland Management Spec	Plant Communities	JHS 1/23/07
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS 1/23/07
Tim Novotny	Wildlife Biologist	Riparian Systems	TN 1/23/07
Barb Blackstun	Natural Resource Specialist	Water Quality	BB 1/26/07
Barb Blackstun	Natural Resource Specialist	Upland Soils	BB 1/26/07

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist _____ Date _____

Signature of NEPA Coordinator _____ Date _____

Signature of the Authorizing Official _____ Date _____

Note: The signed Conclusion on this document is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

ATTACHMENT B
CO-100-2007-032 DNA
Stipulations
COC58293 (Amendment)

1. The holder shall construct, operate, and maintain the facilities, improvements, and structures within the permit in strict conformity with the plan(s) of development identified with the application. Any relocation, additional construction, or use that is not in accord with the approved plan(s) of development, shall not be initiated without the prior written approval of the authorized officer. A copy of the complete permit, including all stipulations and approved plan(s) of development, shall be made available on the permit area during construction, operation, and termination to the authorized officer. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health and safety or the environment.
2. Any cultural and/or paleontological (fossil) resource (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery will be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The holder will be responsible for the cost of evaluation and the authorized officer will make any decision as to proper mitigation measures after consulting with the holder.
3. The operator is responsible for informing all persons who are associated with the operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are encountered or uncovered during any project activities, the operator is to immediately stop activities in the immediate vicinity of the find and immediately contact the authorized officer (AO) (970) 826-5000. Within five working days the AO will inform the operator as to:
 - whether the materials appear eligible for the National Register of Historic Places;
 - the mitigation measures the operator will likely have to undertake before the identified area can be used for project activities again.
 - If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation costs. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.
4. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the authorized officer, by telephone AT (970) 826-5098, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the

vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

5. The holder(s) shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated. In any event, the holder(s) shall comply with the Toxic Substances Control Act of 1976, as amended (15 U.S.C. 2601, et seq.) With regard to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) In excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980, Section 102b. A copy of any report required or requested by any Federal agency or State government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency or State government.

No hazardous materials/waste or trash shall be disposed of on public lands. If a release does occur, it shall be reported to the Little Snake Field Office immediately.

6. Except rights-of-way expressly authorizing a road after construction of the facility is completed, the holder shall not use the right-of-way as a road for purposes other than routine maintenance, as determined necessary by the authorized officer in consultation with the holder.
7. To avoid disturbance of a raptor nesting buffer zone, no construction or maintenance of the pipeline will take place from February 1 through August 31. An exception can be granted by the Authorized Officer, if requested by the holder and if nests are determined to be inactive or abandoned.
8. Prior to termination of the right-of-way, the holder shall contact the authorized officer to arrange a pre-termination conference. This conference will be held to review the termination provisions of the permit.

9. RECLAMATION:

The holder is required to use the reclamation practices necessary to reclaim all disturbed areas. Reclamation will ensure surface and subsurface stability, growth of self-generating, permanent, vegetative cover and compatibility with post land use. The vegetation will be diverse and of the same seasonal growth as adjoining vegetation. Post land use will be determined by the authorized officer but normally will be the same as adjoining uses.

Reclamation practices which must be applied or accomplished are: regrading the approximate original contour, effectively controlling noxious weed, separating, storing and protecting topsoil for redistribution during final abandonment, seeding, and controlling erosion. If topsoil is not present, or quantities are insufficient to achieve reclamation goals, a suitable plant growth media will be separated, stored, and protected for later use. Reclamation will begin with the salvaging of topsoil and continue until the required

standards are met. If use of the disturbed area is for a short time (less than one year), practices which ensure stability will be used as necessary during the project, and practices needed to achieve final abandonment will commence immediately upon completion of the approved activity use and be completed, with exception of vegetative establishment, within one year. If use of the area is for longer periods of time (greater than one year), interim reclamation is required on the unused areas. Interim reclamation of the unused areas will begin immediately upon completion of the permanent facility (s) and be completed, with exception of vegetative establishment, within one year. For both short and long term projects, vegetative establishment will be monitored annually. If the desired vegetation is not established by the end of the second growing season, cultural practices necessary for establishment will be implemented prior to the beginning of the next growing season. If it becomes evident prior to the conclusion of the second growing season that establishment will not be achieved, cultural practices will be implemented prior to the beginning of the next growing season. Interim reclamation, unless otherwise approved, will require meeting the same standards as final abandonment with the exception of original contour, which may be only partially achievable.

Annual reports consisting of reclamation practices completed and the effectiveness of the reclamation will be provided to the Little Snake Resource Area. The first report will be due in January following initiation of reclamation practices and annually thereafter until final reclamation is approved.

There are numerous reclamation practices and techniques which increase the success rate of reclamation and stabilization. With the exception of those stated above, it is the permittee's prerogative to use the methods of reclamation necessary to accomplish the objective. However, it is recommended that the state-of-the-art reclamation, stabilization, and management practices be used to achieve the desired objective in a timely and cost-effective manner.

The following definitions and measurements will be used to accomplish and determine if reclamation has been achieved:

- "permanent vegetative cover" will be accomplished if the basal cover of perennial species, adapted to the area, is at least ninety (90) percent of the basal cover of the undisturbed vegetation of adjoining land or the potential basal cover as defined in the Soil Conservation Service Range Site (s) for the area.

- "diverse" will be accomplished if at least two (2) perennial genera and three (3) perennial species, adapted to the area, make up the basal cover of the reclaimed area in precipitation zones thirteen (13) inches or less and three (3) perennial genera and four (4) perennial species in precipitation zones greater than thirteen (13) inches. One species will not make up more than fifty (50) percent of the perennial vegetation by basal cover.

- "self regenerating" and "adapted to the area" will be evident if the plant community is in good vigor, there is evidence of successful reproduction, and the species are those commonly used and accepted in the area.

"surface stability" will be accomplished if soil movement, as measured by deposits around obstacles, depths of truncated areas, and height of pedestal, is no greater than three tenths (0.3) of an inch and if erosion channels (rills, gullies, etc.) are less than one (1) inch in depth and at intervals greater than ten (10) feet.

If this standard is not met by the end of the second growing season, two alternatives exist depending on the severity of the erosion:

- a. If erosion is greater than two (2) times the allowable amount, correctional action would have to be taken by the responsible company at that time.
- b. If erosion is less than or equal to two (2) times the allowable amount, and it is determined the erosion occurred during vegetative establishment and the site may become stable, no correctional action would be required at that time. Another check (and measurement) would be performed a year later to determine if the stability standards had been met. If the original measurements have not increased by more than the allowed standard, the standard would be considered met. However, if the increase is greater than the allowed standard, corrective action would be required.

- "subsurface stability" (mass wasting event) is of concern if disturbance has included excavation over four (4) feet in depth and greater than 10,000 square feet in area on slopes thirty-five (35) percent and greater, or on any erosion-prone slope (Danforth Hills, Vermillion Bluffs, and Badland areas). When these conditions occur, length of liability for reclamation and final abandonment will continue for ten (10) years following recontouring to original contour for such time that climatic patterns provide two (2) consecutive years in which measurable precipitation totals at least 120 percent of average from October 1 through September 30, as measured by data averaged from nearby regional weather stations.

This stipulation, or portions of it, may be waived by the authorized officer. Such waiver will be documented and justified when not applicable or objectives are accomplished through another method.