

**U.S. Department of the Interior
Bureau of Land Management
Roswell Field Office**

**Documentation of Land Use Plan Compliance
and NEPA Adequacy (DNA)
DNA-060-2003-111**

A. Roswell Field Office

Lease/Serial/Case File No.: NM-110218

Proposed Action Title/Type: Off-Lease Road Right-Of-Way

Location of Proposed Action: E1/2NE1/4NW1/4 & S1/2SE1/4NW1/4

Description of Proposed Action: An off-lease existing access road, that is 2100 feet in length will provide access the West Haystack Unit #1 gas well.

Applicant: Read & Stevens, Inc.

P.O. Box 1518

Roswell, N.M. 88202

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans:

LUP Name: Roswell Resource Management Plan

Date Approved: October 1997

The proposed action is in conformance with the applicable LUPs, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions.

C. Identify the applicable NEPA document(s) and other related documents that cover the Proposed action.

ENVIRONMENTAL ASSESSMENT

EA# NM-060-03-88

WELL NAME & NO.: West Haystack Unit #1

BLM Serial #: NM-90876

D. NEPA Adequacy Criteria:

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Yes.

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, resource values and circumstances? Yes.

The alternative of changing the access road involved in this action was not analyzed further because no other alternative access road route would have significantly fewer impacts than, or have a clear advantage over, the proposed route.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis on the proposed action? Yes.

The no action alternative would constitute denial of the application. This alternative would have no consequential results from the identified environmental impacts. There would, however, be an adverse economic impact to the applicant through the denial of the lessee's right to develop the mineral reserves or through increased costs of accessing those mineral reserves through other means. There have been no unmitigatable impacts identified as a result of this analysis, which would warrant new circumstances that are insignificant with regard to the analysis on the proposed action.

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

While it is likely that there will be no significant cumulative impact from the proposed action, continued oil and gas development, and other surface-disturbing activities in this area, may require additional mitigation measures to be applied to minimize the surface disturbance and conserve the surrounding landscape.

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 sufficiently analyze site-specific impacts related to the current proposed action? Yes.

The surface disturbance involved in the renovation of 2100 feet of existing access road would total an additional 1.4 acres of federal surface. The EA # NM-060-03-88 for the West Haystack Unit #1 analyzes site-specific impacts related to the current proposed action.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from the implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)? Yes.

The same Permanent Resource Road Requirements (Exhibit A), would be applied to this proposed action to minimize the surface disturbance and conserve the surrounding landscape.

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

The 30 day review period for the EA # NM-060-03-88 for the West Haystack Unit #1 was adhered to.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet. The RFO Interdisciplinary Team reviewed the Environmental Assessment for the West Haystack Unit #1 access road and well pad.

F. Mitigation Measure: The Permanent Resource Road Requirements (Exhibit A), would be applied to this

proposed action.

Conclusion

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

/s/Larry D. Bray

Signature of the Responsible Official

5/19/03

Date

EXHIBIT A

1 of 7 pages

PERMANENT RESOURCE ROAD REQUIREMENTS

Operator: Read & Stevens, Inc.

BLM Serial Number: NM-110218

Well Name & NO.: West Haystack Unit #1

Location: Section 18, T. 6 S., R. 27 E.

1980' FSL & 1980' FWL, Chaves County, N.M.

The holder agrees to comply with the following requirements:

1. GENERAL REQUIREMENTS:

- A. The **operator** shall hereafter be identified as the **holder** in these requirements. The Authorized Officer is the person who approves the Permanent Resource Road Requirements.
- B. The holder shall minimize any disturbance to structures on public domain surface. Damages caused to any structure during road construction operations shall be promptly repaired by the holder. Functional use of any structure shall be maintained at all times. The holder shall make a documented good-faith effort to contact the owner prior to disturbing any structure.
- C. When necessary to pass through an existing fence line, the fence shall be braced on both sides of the passageway prior to cutting and the fence shall be promptly repaired to at least it's former state or to a higher standard than it was previously constructed.
- D. A professional engineer shall design the access road if the road grade exceeds 10 percent slope.

2. INGRESS AND EGRESS:

The access road shall be constructed to access the well pad on the **Southwest** corner of the well pad to comply with the planned access road route.

3. ROAD TRAVELWAY WIDTH:

The travelway of the road shall be constructed 14 feet wide. The maximum width of surface disturbance shall not exceed 30 feet of road construction. The specified travelway width is 14 feet for all road travelway surfaces unless the Authorized Officer approves a different width.

4. SURFACING:

Beginning from the dedicated road, the entire length of the access road travelway shall be surfaced prior to drilling operations.

The access road travelway shall be surfaced with caliche or gravel material. If other surfacing material is used, the new type of material shall be approved by the Authorized Officer. The travelway of the road shall be surfaced with **caliche** material. The caliche material shall be compacted to a minimum thickness of **6** inches for the entire length of the travelway surface on the access road. The width of surfacing shall not be less than 14 feet of travelway surface. Prior to using any mineral materials from an existing federal pit, authorization must first be obtained from the Authorized Officer.

5. CROWNING AND DITCHING:

Crowning with materials on site and ditching on one side of the road, on the uphill side, shall be required. The road cross section shall conform to the cross section diagrams in Figure 1 (attached page 6). Where conditions dictate, ditching is required on both sides of the road. The road crown shall have a grade of approximately 2% (i.e., a 1" crown on a 14' wide road).

6. DRAINAGE:

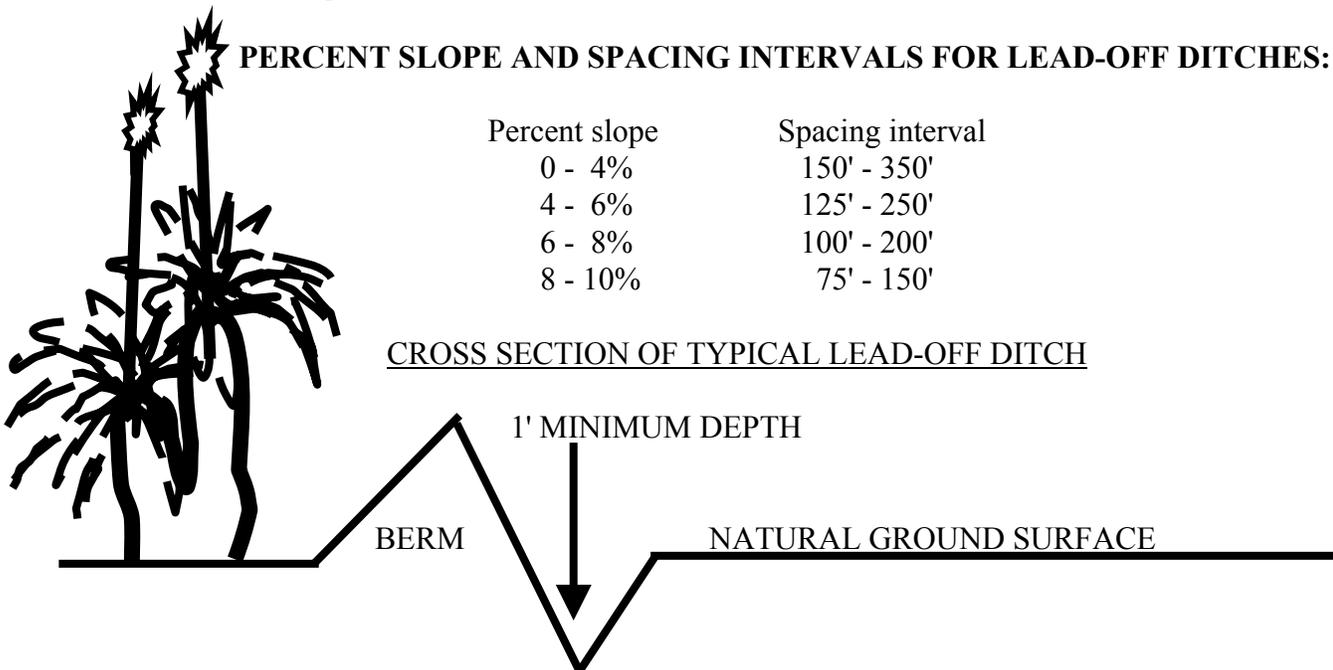
A. Drainage control shall be ensured over the entire road through the construction of ditches, sidehill outsloping and insloping, lead-off ditches, culvert installation, and low water crossings.

B. All lead-off ditches shall be graded to drain water with a 1 percent minimum to 3 percent maximum ditch slope. The spacing interval for lead-off ditches shall be determined according to the following table, but may be amended depending upon existing soil types and centerline road slope (in %):

PERCENT SLOPE AND SPACING INTERVALS FOR LEAD-OFF DITCHES:

Percent slope	Spacing interval
0 - 4%	150' - 350'
4 - 6%	125' - 250'
6 - 8%	100' - 200'
8 - 10%	75' - 150'

CROSS SECTION OF TYPICAL LEAD-OFF DITCH



C. A typical lead-off ditch has a minimum depth of 1 foot below and a berm of 6 inches above natural ground level. The berm shall be on the down-slope side of the lead-off ditch.

D. On road slopes exceeding 2%, water flow shall drain water into an adjacent lead-off ditch. Water flow drainage location and spacing shall be determined by the following formula:

FORMULA FOR SPACING INTERVAL OF LEAD-OFF DITCHES:

$$\text{spacing interval} = \frac{400'}{\text{road slope in \%}} + 100'$$

Ex. 4% slope: spacing interval = $\frac{400}{4} + 100 = 200$ feet

7. CULVERT INSTALLATION:

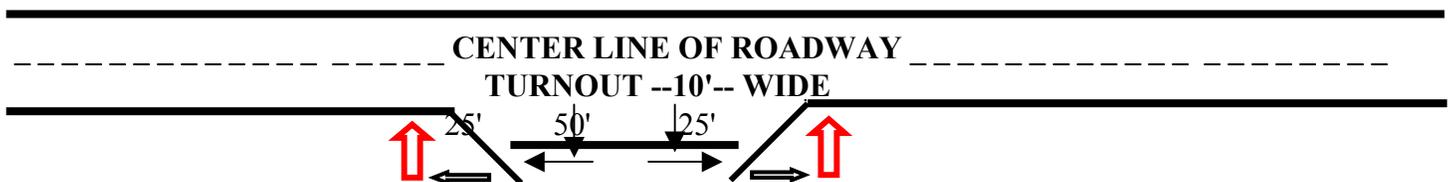
No culverts are required on this road.

Culvert pipes shall be used where ravines, arroyo gullies, and deep waterway channel flows are crossed by the access road construction route. The culvert(s) shall not be less than XX inches in diameter (minimum 18 inch culvert). The location for the culvert installation is designated on the attached map - **EXHIBIT A**. (A culvert pipe installation diagram shall be attached to this requirement when a culvert is required to be installed, see EXHIBIT - X).

8. TURNOUTS:

Vehicle turnouts shall be constructed on all single lane roads (unless the Authorized Officer determines that the turnouts are not required). Turnouts shall be intervisible and shall be constructed on all blind curves with additional turnouts as needed to keep spacing below 1000 feet. Turnouts shall conform to the following diagram:

STANDARD TURNOUT - PLAN VIEW



9. CATTLEGUARDS:

NONE REQUIRED

The existing cattleguard(s) on the access road shall be replaced if they are damaged from heavy vehicular traffic use and the Authorized Officer determines that a new cattleguard shall be installed where the existing in place cattleguard(s) have deteriorated beyond practical use. The holder shall be held responsible for the condition of the existing in place cattleguard(s) that are utilized for vehicular traffic use on lease operations by the holder.

Where used, all cattleguard grids and foundation designs and construction shall meet the American Association of State Highway and Transportation Officials (AASHTO) Load Rating H-20, although AASHTO U-80 rated grids shall be required where heavy loads, (exceeding H-20 loading,) are anticipated. (See BLM standard drawings for cattleguards). Cattleguard grid length shall not be less than 8 feet and width of not less than 14 feet. A wire gate (16-foot minimum width) will be provided on one side of the cattleguard unless requested otherwise by the surface user.

A cattleguard installation diagram shall be attached to this stipulation when a cattleguard is required to be installed - see EXHIBIT X - DIAGRAM A & B).

10. MAINTENANCE:

A. The holder shall maintain the road in a safe, usable condition. A maintenance program shall include, but not be limited to blading, ditching, culvert installation, culvert cleaning, cattleguard maintenance, surfacing, and weed control.

B. The holder shall cooperate with other authorized users in maintenance of the road(s). Failure of the holder to share maintenance costs in dollars, equipment, materials, and manpower proportionate to the holders use with other authorized users may be adequate grounds to terminate the road use. The determination as to whether maintenance expenditures have been withheld by the holder and the decision to terminate the road use shall be at the discretion of the Authorized Officer. Upon request, the Authorized Officer shall be provided with copies of any maintenance agreements entered into by the holder.

11. PUBLIC ACCESS:

A Public access on this road shall not be restricted by the holder without specific written approval being granted by the Authorized Officer. Gates or cattleguards on public land shall not be locked or closed to public use unless closure is absolutely necessary and is authorized in writing by the Authorized Officer.

12. ROAD REHABILITATION REQUIREMENTS:

A. **The access road shall be ripped a minimum of 16 inches deep.** The surface material on the road may be removed and re-used in other approved area(s). Surfacing material left in place shall be plowed under with soil turning equipment and the plowed surface shall be disked before seeding. All culverts and other road structures shall be removed. All over-burden material shall be replaced in the cut areas, ditches, lead-off ditches, and any other excavated earthwork shall be back filled. The road shall be recontoured to as near it's original topography, as possible.

B. An earthen berm shall be constructed at the entrance of the road to prevent vehicular traffic on the reclaimed road.

C. The reclaimed road shall be seeded with the following **DPC seed mixture** (the Roswell Field Office has determined the Desired Plant Community seed mixture for the reclaimed area(s)):

SEE EXHIBIT B - WELL DRILLING REQUIREMENTS - VI. SEEDING REQUIREMENTS - FOR THE DESIRED PLANT COMMUNITY SEED MIXTURE THAT SHALL BE USED ON THE RECLAIMED ACCESS ROAD.

D. The seed and any fertilizer involved shall be broadcast over the roadbed with a spreader, than harrowed to cover the seed. Use of a seed drill planter to plant is acceptable. Appropriate measures shall be taken to ensure that the seed/fertilizer mixture is evenly and uniformly applied. There shall be no primary or secondary noxious weeds in the seed mixture. In accordance with State law(s) the seed should be tested for purity and viability within nine (9) months prior to sell. Commercial seed shall be either certified or registered and the seed mixture container shall be tagged in accordance with State law(s). The seed mixture tag shall be made available to the Authorized Officer for inspection. The seeding shall be repeated until a satisfactory vegetation thicket is established and this determination shall be made by the Authorized Officer. Evaluation of plant growth will not be made before the first growing season.

E. Seeding shall be done between June 15th through September 15th. However, the holder can seed the road immediately after preparing the road bed.

F. The Authorized Officer reserves the right to require reseeding at a specific time if seed does not germinate after one (1) growing season. Waiver of this requirement would be considered if diligent attempts to revegetate the road has repeatedly failed and the Authorized Officer determines that further attempts to revegetate the road would be futile.

G. **Contact Richard G. Hill at (505) 627-0247 to witness the seeding operations two (2) days before the start of the seeding process.**

13. SPECIAL REQUIREMENT(S): NONE