

Application for Permit to Drill (APD) and National Environmental Policy Act (NEPA) – Process Improvement Strategies and Best Business Practices

Incorporate the following process improvement strategies and concepts into field office APD/NEPA procedures:

- Make efficient permit processing a management priority. The field manager and supervisor will maintain close and continual involvement in the energy program to ensure that business practices are efficient and that paperwork flows in the most efficient manner possible.
- Conduct field office and statewide workshops, training, and listening sessions with operators, local government, and the public. Seek recommendations for improving the APD and NEPA processes as well as ideas for improving environmental practices.
- Analyze each step in the processing of APDs, geophysical, and rights-of-way permits to identify the sources of unnecessary delay.
- Designate a field office APD project lead with the authority to coordinate permit review and approval with appropriate staff and the operator. The project lead's role is to ensure the APD moves efficiently through the process. The project lead should have authority to work directly with the staff and the operator to eliminate roadblocks or to secure immediate resolution by the field manager. Normally, the resource or realty specialist responsible for permit processing serves as the project lead.
- Review Washington Office Instruction Memorandum 2005-046 *Policy for Entry of Data into Applications for Permit to Drill Processing, Tracking, and Monitoring Fields in the Automated Fluid Minerals Support System (AFMSS) Database*. Ensure the new required data fields are being populated. Use AFMSS to track field office APD processing times.
- Consider the use of rights-of-way Master Agreements for companies that routinely submit several APDs with associated rights-of-way each year.
- Meet regularly within the field office to ensure APD project leads and permitting and inspection staff follow the same processes and maintain the same improved standards for conduct of exploration and development operations.
- Use the principles of "Risk Management" to break away from business as usual. When a NEPA analysis is required, focus on addressing the issues while avoiding excessive documentation, data collection, reports, and studies that are not critical to reaching a decision. The Council on Environmental Quality provides the following guidance:
 - "Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail."
 - "Ultimately, of course, it is not better documents but better decisions that count. NEPA's purpose is not to generate paperwork--even excellent paperwork--but to foster excellent action."
 - "Your Environmental Assessment (EA) should be a 'concise public document' of no more than 10-15 pages..."
- Use an interdisciplinary team for writing and reviewing documents. Ensure that reviews are conducted concurrently, not sequentially. (Passing off a draft NEPA document

sequentially from one specialist to the next remains a major source of needless processing delay.) Strongly consider developing APD Teams with dedicated team members.

- Develop a close and positive working relationship between the Resources and Minerals staffs.
- Apply Energy Policy Act, Section 390 Categorical Exclusions where appropriate.
- Expand use of applicant-supplied EAs where this would expedite the APD permitting process. Avoid using BLM-funded contract EAs unless they truly reduce processing time, fill a need that BLM staff cannot meet, or free up staff time to conduct other priority activities.
- Work more closely with operators:
 - early in the process to identify and plan for future development needs rather than allowing development to occur in an unplanned manner;
 - by holding “Operator Workshops” to help keep operators up-to-date on Bureau policies and processes for ensuring timely processing of APDs;
 - to encourage the submission of APDs in multiple APD packages or Plans of Development (POD);
 - to encourage the operator to submit well-thought-out, complete APDs not subject to continual updating and delays;
 - to combine field development proposals of various operators in the area into a single EIS rather than prepare individual EISs;
 - to ensure submission of environmentally sound proposals that incorporate environmental Best Management Practices which require less review by staff specialists in the NEPA process.
- Improve consultation and coordination with States and the public by consulting and coordinating early and often in the land use planning and gas field development processes.
- Implement procedures from Washington Office IM 2005-247 *National Environmental Policy Act (NEPA) Compliance for Oil, Gas, and Geothermal Development* and IM 2005-235 *Interim Guidance for Process Time Line - Permitting Oil and Gas Operations on Federal and Indian Leases*.
- Attend National Training Center courses such as NEPA for Managers, **Surface Management of Fluid Minerals Development**, and rights-of-way courses to increase knowledge and skill levels.