

**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-100-2007-001 DNA

PROJECT NAME: February 2007 Oil & Gas Leasing, Little Snake Field Office

LEGAL DESCRIPTION: See Exhibit A

A. Describe the Proposed Action

The proposal is to lease, for potential oil and gas exploration and production, approximately 10,800 acres of Federal mineral estate within the Little Snake Field Office Area. The US Bureau of Land Management (BLM) and private landowners manage the surface estate. The mineral estate is administered by the BLM. Thirteen parcels of varying sizes are recommended to be leased. (See Exhibit A) All of the acreage is in Moffat County and Routt County. The legal descriptions and applicable land use stipulations are identified in Exhibit A. The parcels identified in Exhibit A are proposed to be included in the upcoming February 2007 competitive lease sale.

As part of the Little Snake Field Office (LSFO) review, parcels are reviewed to make sure the appropriate stipulations will be attached at the time of the lease sale. Parcels 3855, 3886, 3847, 3887, 3852, 3866, 3838, 3867, 3856, 3877, 3878, 3848, and 3851 recommended for leasing have the correct stipulations identified.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Resource Area, Resource Management Plan (RMP)/EIS and Record of Decision (ROD)

Date Approved: April 26, 1989

Final RMP/EIS, September 1986

Draft RMP/EIS, February 1986

The proposed action implements the LUPs Planned Action objective on Page 8 of the ROD to allow oil and gas leasing with required stipulations.

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

Colorado Oil and Gas Leasing & Development Final EIS Plan Amendment

Date Approved: October 1991

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 proposed lease parcels are within the area analyzed by the RMP and this action is the same as proposed there in. That action was to make Federal oil and gas resources available for leasing with standard stipulations or, where necessary add special stipulations including no surface occupancy, avoidance, or timing restrictions.

According to the Tenth Circuit Court of Appeals, site-specific NEPA analysis is not possible absent concrete proposals. Filing of an Application for Permit to Drill is the first useful point at which a site-specific environmental appraisal can be undertaken. (Park County Resource Council, Inc. v. U.S. Department of Agriculture, 10th Cir., April 17, 1987). In addition, the Interior Board of Land Appeals has decided that, BLM is not required to undertake a site-specific environmental review before issuing an oil and gas lease when it previously analyzed the environmental consequences of leasing the land. (Colorado Environmental Coalition Et AL., IBLA 96-243, decided June 10, 1999).

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 the RMP included Continuation of Present Management, Standard Terms and Conditions, and the Proposed Action. They provided a broad range of alternatives, which in our judgment adequately address current environmental concerns, interests, and resource values.

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

Yes, the existing RMP/EIS is valid. Four parcels are within or adjacent to special status species habitat. Parcels 3848 and 3851 are within areas known to contain existing populations of northern leopard frogs (*Rana pipiens*), a BLM special status species. Parcel #3877 contains a known population of Duchesne milkvetch (*Astragalus duchesnensis*), a BLM sensitive species. Parcel #3878 has a high potential for occurrence of Duchesne milkvetch. Parcel #3848 is immediately adjacent to a known population and has a high potential for other occurrences of narrow-leaf evening primrose (*Oenothera acutissima*), a BLM sensitive species.

While species-specific stipulations for northern leopard frogs, Duchesne milkvetch, and narrow-leaf evening primrose are not analyzed in this RMP/EIS, there is a stipulation that alerts the lessee of known or suspected sensitive plant or animal species, and high priority remnant vegetation associations. A biological and/or botanical inventory may be required prior to approval of operations. The inventory would be used to prepare mitigative measures (consistent with lease rights) to reduce the impacts of surface disturbance to the sensitive plant or animal species. These mitigative measures may include (but are not limited to) relocation of roads, pads, pipelines, and other facilities, and fencing operations or habitat. The RMP/EIS also contains a stipulation which calls for No Surface Occupancy (NSO) on habitat areas with special status plant species (includes federally listed and proposed species for listing and candidate species).

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

The methodology and analytical approach used in the 1991 leasing EIS is appropriate for this proposed action. The use of new methodologies or approaches would result in the same impact conclusion and leasing decisions.

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?

The direct and indirect impacts of the current proposed action are substantially unchanged from those identified in the 1991 leasing EIS. (See also D.1. above.)

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 in the 1991 Oil & Gas Leasing Plan Amendment on pages 2-27 thru 4-29. 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?

Yes. Full public review occurred during the RMP/EIS process. The current proposed lease sale would fall under the RMP/EIS. In addition, a notice of competitive lease sale is posted in all BLM and USFS offices approximately 45 days prior to the sale or on the BLM web site, www.co.blm.gov/oilandgas/leasinfo.htm. It is also available through the mail for a fee to those that request it and make arrangements to pay the fee.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this document.

Name	Title	Resource	Initials	Date
Duane Johnson	Environmental Coordinator	NEPA	DJ	10/18/06
Barb Blackstun	Natural Resource Specialist	Soil, Air, and Water	BB	10/18/06
Tim Novotny	Wildlife Biologist	Wildlife, Wetlands/Riparian Zones, T&E Animal Species	TN	10/13/06
Jim McBrayer	Recreation Planner	WSA, W&S Rivers	JM	10/13/06
Robyn Morris	Archaeologist	Cultural Resources & Native American Religious Concerns	RM	10/13/06
Hunter Seim	Range Specialist	BLM Sensitive, T&E Plant Species	JHS	10/03/06
Bonnie Hickey	Land Law Examiner	Legal Verification	BH	10/18/06

Remarks:

Cultural Resources: Any lease parcel may contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O.13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.”

Native American Religious Concerns: None known. Further tribal consultation will occur prior to the issuance of any permit.

T&E Species: Parcels 3848 and 3851 are within areas known to contain existing populations of northern leopard frogs (*Rana pipiens*), a BLM special status species. Parcel #3877 contains a known population of Duchesne milkvetch (*Astragalus duchesnensis*), a BLM sensitive species. Parcel #3878 has a high potential for occurrence of Duchesne milkvetch. Parcel #3848 is immediately adjacent to a known population and has a high potential for other occurrences of narrow-leaf evening primrose (*Oenothera acutissima*), a BLM sensitive species.

State Wildlife Areas: A meeting between the Colorado Division of Wildlife (CDOW) and the BLM was held on October 10, 2006 in order to discuss leasing within State Wildlife Areas. CDOW informed the BLM of special resource concerns that they had for the areas.

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.

EXHIBIT A

**Legal descriptions & associated stipulations
Little Snake Field Office
February 2007 Oil & Gas Lease Sale**

THE FOLLOWING ACQUIRED LANDS ARE SUBJECT TO FILINGS IN THE MANNER SPECIFIED IN THE APPLICABLE PORTIONS OF THE REGULATIONS IN 43 CFR, SUBPART 3120.

1. PARCEL ID: 3855 SERIAL #:

T. 0090N., R 0950W., 6TH PM

Sec. 2: S2;	U.S. Interest 100.00%
Sec. 3: Lot 1,2;	U.S. Interest 100.00%
Sec. 3: S2NE,SE;	U.S. Interest 100.00%
Sec. 10: S2;	U.S. Interest 100.00%
Sec. 13: NE,N2NW,SE,SW,NESW;	U.S. Interest 100.00%
Sec. 14: S2NE,SE,SW,N2S2,SWSW;	U.S. Interest 100.00%

Moffat County

Colorado 1600.920 Acres

All lands are subject to Exhibit CO-09 to protect big game winter habitat.

All lands are subject to Exhibit CO-15 to protect grouse winter habitat.

The following lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation:

T. 0090N., R 0950W., 6TH PM

Sec. 14: W2SW;

The following lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse:

T. 0090N., R 0950W., 6TH PM

Sec. 2: S2;
Sec. 3: Lot 1,2;
Sec. 3: S2NE,SE;
Sec. 10: S2;
Sec. 13: NE,N2NW,SE,SW,NESW;
Sec. 14: W2SW,SE,NE;

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

The following lands are subject to Exhibit LS-12 to alert lessee of potential closure for sheep lambing grounds:

T. 0090N., R 0950W., 6TH PM

Sec. 2: S2;

Sec. 3: Lot 1,2;

Sec. 3: S2NE,SE;

BLM; CDO: LSRA

THE FOLLOWING PUBLIC DOMAIN LANDS ARE SUBJECT TO FILINGS IN THE MANNER SPECIFIED IN THE APPLICABLE PORTIONS OF THE REGULATIONS IN 43 CFR, SUBPART 3120.

2. PARCEL ID: 3886 SERIAL #:

T. 0060N., R 0860W., 6TH PM
Sec. 19: Lot 3,4;
Sec. 19: E2SW;

Routt County
Colorado 155.600 Acres

All lands are subject to Exhibit CO-09 to protect big game winter habitat.

All lands are subject to Exhibit CO-25 to protect surface or underground coal mines.

All lands are subject to Exhibit CO-26 to protect fragile soils.

The following lands are subject to Exhibit CO-27 to protect steep slopes:

T. 0060N., R 0860W., 6TH PM
Sec. 19: NESW;

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM; CDO: LSRA

3. PARCEL ID: 3847 SERIAL #:

T. 0050N., R 0870W., 6TH PM
Sec. 4: SENW,NESW;

Routt County
Colorado 80.000 Acres

All lands are subject to Exhibit CO-25 to protect surface or underground coal mines.

All lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM; CDO: LSRA

4. PARCEL ID: 3887 SERIAL #:

T. 0040N., R 0900W., 6TH PM
Sec. 28: SWNE;

Moffat County
Colorado 40.000 Acres

The following lands are subject to Exhibit CO-25 to protect surface or underground coal mines:

T. 0040N., R 0900W., 6TH PM
Sec. 28: SWNE

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM; CDO: LSRA

5. PARCEL ID: 3852 SERIAL #:

T. 0110N., R 0910W., 6TH PM
Sec. 8: Lot 1-14;
Sec. 17: Lot 1-7;

Moffat County
Colorado 888.700 Acres

The following lands are subject to Exhibit CO-02 to protect grouse dancing grounds:

T. 0110N., R 0910W., 6TH PM
Sec. 17: Lot 7;

The following lands are subject to Exhibit CO-03 to protect raptor nests:

T. 0110N., R 0910W., 6TH PM
Sec. 17: Lot 7;

All lands are subject to Exhibit CO-09 to protect big game winter habitat.

All lands are subject to Exhibit CO-15 to protect grouse winter habitat.

The following lands are subject to Exhibit CO-18 to protect raptor nesting and fledgling habitat:

T. 0110N., R 0910W., 6TH PM
Sec. 8: Lot 1-4;
Sec. 17: Lot 4,7;

The following lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation:

T. 0110N., R 0910W., 6TH PM
Sec. 8: Lot 2,3,7,10,14;
Sec. 17: Lot 5,6;

All lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

BLM; CDO: LSRA

6. PARCEL ID: 3866 SERIAL #:

T. 0100N., R 0930W., 6TH PM
Sec. 17: N2NE,NENW,W2SW,SESE;
Sec. 18: Lot 3,4;
Sec. 18: E2SW;
Sec. 19: Lot 1,2;
Sec. 19: E2NW;
Sec. 20: N2,N2S2;

Moffat County
Colorado 1028.170 Acres

All lands are subject to Exhibit CO-15 to protect grouse winter habitat.

The following lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse:

T. 0100N., R 0930W., 6TH PM
Sec. 17: SESE,SWSW;
Sec. 19: SENW;
Sec. 20: N2,N2S2;

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM;BLM; CDO: LSRA

7. PARCEL ID: 3838 SERIAL #:

T. 0040N., R 0940W., 6TH PM

Sec. 21: NWSE;

Sec. 28: NESE;

Sec. 29: NWSE;

Sec. 32: Lot 4;

Sec. 33: SWSE;

Moffat County

Colorado 192.350 Acres

The following lands are subject to Exhibit CO-02 to protect grouse dancing grounds:

T. 0040N., R 0940W., 6TH PM

Sec. 28: NESE;

The following lands are subject to Exhibit CO-03 to protect raptor nests:

T. 0040N., R 0940W., 6TH PM

Sec. 21: NWSE

All lands are subject to Exhibit CO-15 to protect grouse winter habitat.

The following lands are subject to Exhibit CO-18 to protect raptor nesting and fledgling habitat:

T. 0040N., R 0940W., 6TH PM

Sec. 21: NWSE;

Sec. 28: NESE;

The following lands are subject to Exhibit CO-25 to protect surface or underground coal mines:

T. 0040N., R 0940W., 6TH PM

Sec. 21: NWSE

Sec. 28: NESE

Sec. 29: NWSE

Sec. 33: SWSE

The following lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation:

T. 0040N., R 0940W., 6TH PM

Sec. 21: NWSE

Sec. 28: NESE

Sec. 29: NWSE

All lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM;BLM; CDO: LSRA

8. PARCEL ID: 3867 SERIAL #:

T. 0100N., R 0940W., 6TH PM

Sec. 1: Lot 3;

Sec. 1: SENW,W2SE;

Sec. 12: SESW;

Sec. 13: NE;

Moffat County

Colorado 360.040 Acres

All lands are subject to Exhibit CO-15 to protect grouse winter habitat.

All lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM;BLM; CDO: LSRA

9. PARCEL ID: 3856 SERIAL #:

T. 0090N., R 0950W., 6TH PM

Sec. 4: Lot 1-4;

Sec. 4: S2N2;

Sec. 8: Lot 2;

Sec. 8: NE,E2NW,SWNW,S2;

Sec. 11: ALL;

Sec. 13: SWNW,W2SW,SESW,SE;

Sec. 14: N2NE,S2SE;

Moffat County
Colorado 2072.750 Acres

All lands are subject to Exhibit CO-09 to protect big game winter habitat.

The following lands are subject to Exhibit CO-30 to alert lessee of closure period for nesting sage grouse:

T. 0090N., R 0950W., 6TH PM
Sec. 4: Lot 1-4;
Sec. 4: S2N2;
Sec. 8: Lot 2;
Sec. 8: NE,E2NW,SWNW,S2;
Sec. 11: ALL;
Sec. 13: SWNW,NWSW,SESW,SE;
Sec. 14: N2NE;

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM;BLM; CDO: LSRA

10. PARCEL ID: 3877 SERIAL #:

T. 0090N., R 1020W., 6TH PM
Sec. 13: ALL;
Sec. 14: ALL;
Sec. 23: ALL;
Sec. 24: ALL;

Moffat County
Colorado 2560.000 Acres

All lands are subject to Exhibit CO-08 to protect habitat areas with special status plant species.

The following lands are subject to Exhibit CO-09 to protect big game winter habitat:

T. 0090N., R 1020W., 6TH PM
Sec. 13: N2NW,S2;
Sec. 14: ALL;
Sec. 23: ALL;
Sec. 24: ALL;

The following lands are subject to Exhibit CO-26 to protect fragile soils:

T. 0090N., R 1020W., 6TH PM
Sec. 13: NENW;

The following lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation:

T. 0090N., R 1020W., 6TH PM
Sec. 13: N2NE;

All lands are subject to Exhibit CO-31 to protect habitat of sensitive plant or animal species.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

The following lands are subject to Exhibit LS-13 to alert lessee of special mitigation for prairie dog complexes:

T. 0090N., R 1020W., 6TH PM
Sec. 23: S2NW,N2SW;
Sec. 24: S2SE;

BLM; CDO: LSRA

11. PARCEL ID: 3878 SERIAL #:

T. 0090N., R 1020W., 6TH PM
Sec. 15: E2;
Sec. 22: Lot 1,4;
Sec. 22: E2,S2NW,SW;

Moffat County
Colorado 919.540 Acres

All lands are subject to Exhibit CO-08 to protect habitat areas with special status plant species.

All lands are subject to Exhibit CO-09 to protect big game winter habitat.

The following lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation:

T. 0090N., R 1020W., 6TH PM
Sec. 22: Lot 3,4;
Sec. 22: SENW,W2SE,NESW;

All lands are subject to Exhibit CO-31 to protect habitat of sensitive plant or animal species.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

The following lands are subject to Exhibit LS-13 to alert lessee of special mitigation for prairie dog complexes:

T. 0090N., R 1020W., 6TH PM
Sec. 15: NE;
Sec. 22: SENE,NESE;

BLM; CDO: LSRA

12. PARCEL ID: 3848 SERIAL #:

T. 0120N., R 1030W., 6TH PM
Sec. 28: Lot 1,3;
Sec. 28: W2NE;
Sec. 30: Lot 8;
Sec. 30: NENE,SESW,SE;
Sec. 32: SENE,N2NW;

Moffat County
Colorado 527.240 Acres

All lands are subject to Exhibit CO-08 to protect habitat areas with special status plant species.

The following lands are subject to Exhibit CO-10 to protect elk calving:

T. 0120N., R 1030W., 6TH PM
Sec. 28: Lot 1,3;
Sec. 28: W2NE;
Sec. 30: Lot 8;
Sec. 30: NENE,SWSE,NWSE;

All lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation.

All lands are subject to Exhibit CO-31 to protect habitat of sensitive plant or animal species.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

The following lands are subject to Exhibit LS-07 to protect isolated and/or roadless resources:

T. 0120N., R 1030W., 6TH PM

Sec. 28: Lot 1,3;

Sec. 28: W2NE;

PVT/BLM;BLM; CDO: LSRA

13. PARCEL ID: 3851 SERIAL #:

T. 0120N., R 1040W., 6TH PM

Sec. 36: Lot 1,3,5,7,13,14;

Sec. 36: N2N2;

Moffat County

Colorado 339.610 Acres

All lands are subject to Exhibit CO-10 to protect elk calving.

All lands are subject to Exhibit CO-28 to protect riparian/wetland vegetation.

All lands are subject to Exhibit CO-31 to protect habitat of sensitive plant or animal species.

All lands are subject to Exhibit CO-34 to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal.

All lands are subject to Exhibit CO-39 to protect cultural resources.

PVT/BLM; CDO: LSRA