



**United States Department of the Interior
Bureau of Land Management
Bakersfield Field Office
3801 Pegasus Drive
Bakersfield, California 93308-6837
www.ca.blm.gov/bakersfield**



Dear Valued Stakeholder:

E&B Natural Resources Management Corp. (E&B) has submitted one (1) Application for Permit to Drill (APD) that proposes the drilling of one (1) new well: Schlaudeman #354-23 on their federal lease on Bureau of Land Management (BLM) managed lands located in Section 23, T. 11 N., R. 28W., SBBM. The project location is San Luis Obispo, CA within the Carrizo Plain National Monument (CPNM), as well as within the existing Russell Ranch Oil Field. E&B proposes the use of an existing well pad location for the drilling of the new well.

The purpose of the proposed action is to provide E&B with the ability to drill one (1) new oil well and associated production facilities to continue production on their federal mineral lease, and to supply energy resources to the American public. The need for the proposed action is to respond to the APD submitted by the proponent to conduct operations on public lands administered by the BLM Bakersfield Field Office.

E&B operates producing oil wells and petroleum production facilities on both private and public lands within the Russell Ranch Oil Field since 2003. This project is proposed on an existing valid federal mineral lease that was established in 1948 and has been held by production since 1949. The proposed drill site is located on BLM surface with an existing pad location for existing well RRU-77-23. Records indicate that the well pad was constructed prior to 1950 for well RRU-77-23. A total of 5 wells have been drilled on this lease from 5 separate locations including 1 active well, 1 shut in well, and 3 abandoned wells. This action conforms and is within the scope of the Carrizo Plain National Monument Resource Management Plan signed April 10, 2010. All stipulations and standard operating procedures will be followed as set for in this plan.

A draft environmental assessment has been posted on our website at <http://www.blm.gov/ca/st/en/fo/bakersfield.html>. There will be a 30-day comment period on the environmental assessment. Please submit comments by mail or email to the attention of Natural Resource Specialist John Hodge- jhodge@blm.gov no later than April 20, 2012. If you should have, any additional questions please feel free to contact me at (661) 391-6005.

Sincerely,

Timothy Z. Smith
Field Office Manager

**UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BAKERSFIELD FIELD OFFICE
ENVIRONMENTAL ASSESSMENT**

**E&B Natural Resources Management Corp.
Russell Ranch Oil Field; APD for New Well Schlaudeman#354-23
Environmental Assessment #: DOI-BLM-CA-C060-2012-0040-EA**

Chapter 1. Purpose and Need

PURPOSE AND NEED

E&B Natural Resources Management Corp. (E&B) has submitted one (1) Application for Permit to Drill (APD) that proposes the drilling of one (1) new well: Schlaudeman #354-23 on their federal lease (CALA 088009) on Bureau of Land Management (BLM) managed lands located in Section 23, T. 11 N., R. 28W., SBBM. The project location is San Luis Obispo County, CA within the Carrizo Plain National Monument (CPNM), as well as within the existing Russell Ranch Oil Field. E&B proposes the use of existing access road(s) and an existing well pad location for the drilling of the new well.

E&B has operated producing oil wells and petroleum production facilities on both private and public lands within the Russell Ranch Oil Field since 2003. This project is proposed on an existing valid federal mineral lease that was established in 1948 and has been held by production since 1949. The proposed drill site is located on BLM surface with an existing pad location for existing well RRU-77-23. Records indicate that the well pad was constructed prior to 1950 for well RRU-77-23. A total of 5 wells have been drilled on this lease from 5 separate locations including 1 active well, 1 shut in well, and 3 abandoned wells.

The purpose of the proposed action is to provide E&B with the authority to drill one (1) new oil well and install associated production facilities to continue production on their federal mineral lease, and to supply energy resources to the American public. The need for the proposed action is to respond to the APD submitted by the proponent to conduct operations on public lands administered by the BLM Bakersfield Field Office in accordance with Federal Onshore Order No. 1.

This environmental assessment (EA) has been prepared in compliance with the National Environmental Policy Act (NEPA) and other relevant federal and state laws and regulations. This document will disclose and analyze the environmental consequences that are anticipated from the drilling of one new producing oil well from an existing well pad and the potential installation of production facilities within the Russell Ranch Oil Field and within the Carrizo Plain National Monument.

Conformance with BLM land use plans

The proposed action falls within the Caliente Mountain South Area of the CPNM Resource Management Plan (RMP) approved on 4/10/2010. This plan has been reviewed as required by 43 CFR 1610.5, and it has been determined that the proposed action conforms with the land use plan goals, objectives, and management actions.

The RMP determined that the CPNM contains a number of extractable minerals including oil and gas. The CPNM RMP (pg. II-72 to II-75) established objectives and management actions for all projects to

ensure that Monument resources are protected while allowing reasonable access for valid existing rights for mineral development. These objectives and management actions include:

- Objective MNL-5: Process permits in a timely fashion as required by the *Leasing Reform Act* of 1987, Onshore Orders and Notices to Lessees, the *Energy Act* of 2005, and other laws, regulations, and policies; and consistent with federal, state, and local laws and regulations and dependent on agency staff and resource limitations.
- Objective MNL-7: Manage existing leases with additional requirements (above federal standards) to protect Monument resources.
- Action BIO-2(S): When necessary, oil and gas related actions will require individual Section 7 consultations. Programmatic consultations will not be used for oil and gas related actions.
- Action MNL-1: All projects will be reviewed and the SOPs and Implementation Guidelines for Projects Affecting the Biological Environment, and the Minerals SOPs/BMPs/Implementation Guidelines and Conditions of Approval will be applied.
- Action MNL-8: Design roads, well pads, and facilities to impact and fragment the least acreage practicable. New facilities will be designed to maintain natural drainages and runoff patterns, reduce visual impacts, and reduce hazards to wildlife, especially California condors.
- Action MNL-9: Ensure BMPs are followed. (Examples pg.II-74)

Relationship to Statutes, Regulations and Other Plans

Oil and Gas Laws and Regulations

The CPNM contains a number of extractable minerals including oil and gas. These minerals are managed accordance with the *Mineral Leasing Act* of 1920, as amended: the *Mining and Minerals Policy Act* of 1970; the *Federal Onshore Oil and Gas Leasing Reform Act* of 1987; 43 CFR, Onshore Orders 1-8, NEPA; the *Energy Policy Act* of 2005; and other laws, regulations, orders, and also in accordance with all applicable state, county, and local laws and ordinances. BLM requires existing lessees to strictly adhere to all laws, regulations, and policies that govern oil and gas leases, while at the same time recognizing that existing leases grant the lessee certain rights. No additional requirements can be placed on an existing lessee that conflicts with the rights already granted to the lessee.

Endangered Species Act

The Endangered Species Act of 1973 (ESA) requires federal agencies to complete formal consultation with the United States Fish and Wildlife Service (FWS) for any action that “may affect” federally listed species or critical habitat. The ESA also requires federal agencies to use their authorities to carry out programs for the conservation of endangered and threatened species.

Formal consultation was completed on the Carrizo RMP and an April 2, 2010 Biological Opinion (81420-2010-F-0089) was issued. The Carrizo RMP Biological Opinion provides ESA compliance for the

Carrizo RMP and certain project level actions taken to implement the RMP, including the proposed action evaluated by this NEPA document. The Carrizo RMP BO contains measures for conserving listed species and their habitats that have been incorporated into the proposed action.

This project is subject to compliance with the April 2, 2010 Biological Opinion. The project to drill one new well on an existing pad, within a valid, existing lease was analyzed in the RMP and fully addressed in the April 2, 2010 Biological Opinion. No further consultation is required unless a re-initiation¹ clause is triggered.

¹Re-initiation of consultation is required when discretionary Federal action has been retained and if: 1) the amount or extent of incidental take is exceeded; 2) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in the original opinion; 3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in the original opinion; or 4) a new species is listed or critical habitat designated that may be affected by the action.

Per CPNM RMP, *Action BIO-2(S)*: When necessary [i.e.: any oil and gas related action within the CPNM that BLM determines to have a “may affect determination” to federally listed threatened or endangered species], oil and gas related actions will require individual Section 7 consultations. Programmatic consultations will not be used for oil and gas related actions. P. II-18.

Additional recovery plans for endangered species include: Recovery Plan for the California Condor (USFWS 1996); Recovery Plan for Upland Species for the San Joaquin Valley (USFWS 1998); and the Recovery Plan for the Kern Primrose Sphinx Moth (USFWS 1984).

Master MOU between BLM and the California Department of Fish and Game (applicable for State listed Species)

Some allotments may also provide habitat for State listed fish, wildlife, and plant species. In a Master MOU between BLM and the California Department of Fish and Game (Department), BLM agrees to notify the Department of all projects involving impacts to, or manipulation of, State-listed rare and endangered fish, wildlife and plants and to obtain State recommendations for the project-specific management of such populations. Oil and Gas activities addressed in the Carrizo RMP were designed to be compatible with State listed species and other State Species of Special Concern. These actions were reviewed by the Department as part of the Carrizo RMP. BLM staff maintains close contact with individual unit biologists so that any new concerns can be addressed.

Carrizo Plain National Monument Proclamation

A Presidential Proclamation on January 17, 2001 established the Carrizo Plain National Monument for the purpose of protecting the biological, geological, paleontological, historic and prehistoric resources of this area. The monument is to be managed by the Secretary of the Interior through the Bureau of Land Management. It further states that, “The establishment of this monument is subject to valid existing rights.”

Issues and scoping

Following a BLM Onsite Inspection completed by Natural Resource Specialist, John Hodge on October 19, 2011, scoping was initiated internally with the Bakersfield FO Resources staff on November 1, 2011. Issues identified during the onsite and scoping include: a) consistency with the CPNM-RMP for the

siting and drilling of one new well on an existing pad location within the CPNM; b) identification of cultural resources and applicable mitigation (avoidance and/or determination of eligibility for inclusion in the National Historic Register); c) potential impacts to threatened and endangered species, BLM sensitive species, and/or endangered species habitat and applicable avoidance and mitigation measures; and d) consistency with the CPNM-RMP for visual resource management and the proposed siting of one new well on an existing pad location in an area inventoried as Class III, but managed as VRM Class II.

Additionally, on November 15, 2011, BLM posted the proposed action for a 15-day public comment period. The posting included: BLM cover letter, a copy of the proposed action and alternatives, a copy of the Application for Permit to Drill, photos of the proposed project location, and a map of the project location. Official response was received from the Los Padres Forest Watch on December 1, 2011. The comments are attached as Appendix 1.

BLM will post the Environmental Assessment and draft Finding of No Significant Impact statement for a 30-day public comment period prior to issuing a decision record.

Chapter 2. Proposed Action and Alternatives

ALTERNATIVE 1: PROPOSED ACTION

The proposed action is to approve the APD for drilling one new well (Schlaudeman #354-23) on the existing pad for well RRU-77-23 located within the Russell Ranch Oil Field. E&B proposes the drilling of the new well on their federal lease (CALA 088009) on Bureau of Land Management (BLM) managed lands located in Section 23, T. 11 N., R. 28W., SBBM. The project location is San Luis Obispo County, CA within the Carrizo Plain National Monument (CPNM), as well as within the existing Russell Ranch Oil Field (Map 1). The existing pad for well RRU-77-23 will be used for drilling operations for this new well. It is actively maintained and of sufficient size to accommodate all equipment and vehicles required for drilling without additional construction. Existing roads will be used to access the pad location and will be maintained in the same or better condition in accordance with BLM standards. No new roads will be constructed or reconstructed with this project.

For drilling operations the drill rig will be set up on the existing pad and associated tanks, and equipment will be housed on the pad location. Vehicle parking will be on the pad location or at a nearby pad so no disturbance to vegetation or wildlife habitat will occur. Fresh water for drilling will be supplied by produced lease water. Water will be temporarily piped to the location if possible, or hauled to the location by vacuum trucks. A temporary above ground tank will be used instead of a sump to collect drill cuttings utilizing a closed loop system. Drilling wastes will be collected in a rollaway container and will remain in the container and solidified using Soli-Bond or similar technology and hauled to an appropriate disposal facility. Other solid wastes will be collected in a trash trailer near the wellsite and serviced when needed. Portable toilets will be provided and serviced by the drilling contractor.

In the Surface Use Plan, E&B does not propose to conduct hydraulic fracturing of this well. In addition, personnel communications with E&B Environmental Coordinator, Kim Kelley, confirmed that fracturing of this well is not planned at this time.

E&B proposes to perform hydrostatic testing to the existing buried oil production flowline for well RRU-77-23. If the production flowline passes then it will be used to carry oil to the existing Main Tank Farm. If the production pipeline does not pass hydrostatic testing then E&B proposes to install a new pipeline above ground along the same route as the existing flowline. Pipe would be constructed on areas of previous disturbance and pushed from the pad location through areas of habitat to ensure that new habitat disturbance associated with the installation of the pipeline is minimized to the greatest extent possible. It

would then tie into the existing groupline that is located at well #RRU-78-23. The total distance of the replacement production pipeline would be 0.12 miles (Map2).

Subsequent to drilling and well completion, all drilling equipment will be removed. When the well is abandoned, all well facilities will be removed and the surface restored as nearly as practical to its natural state.

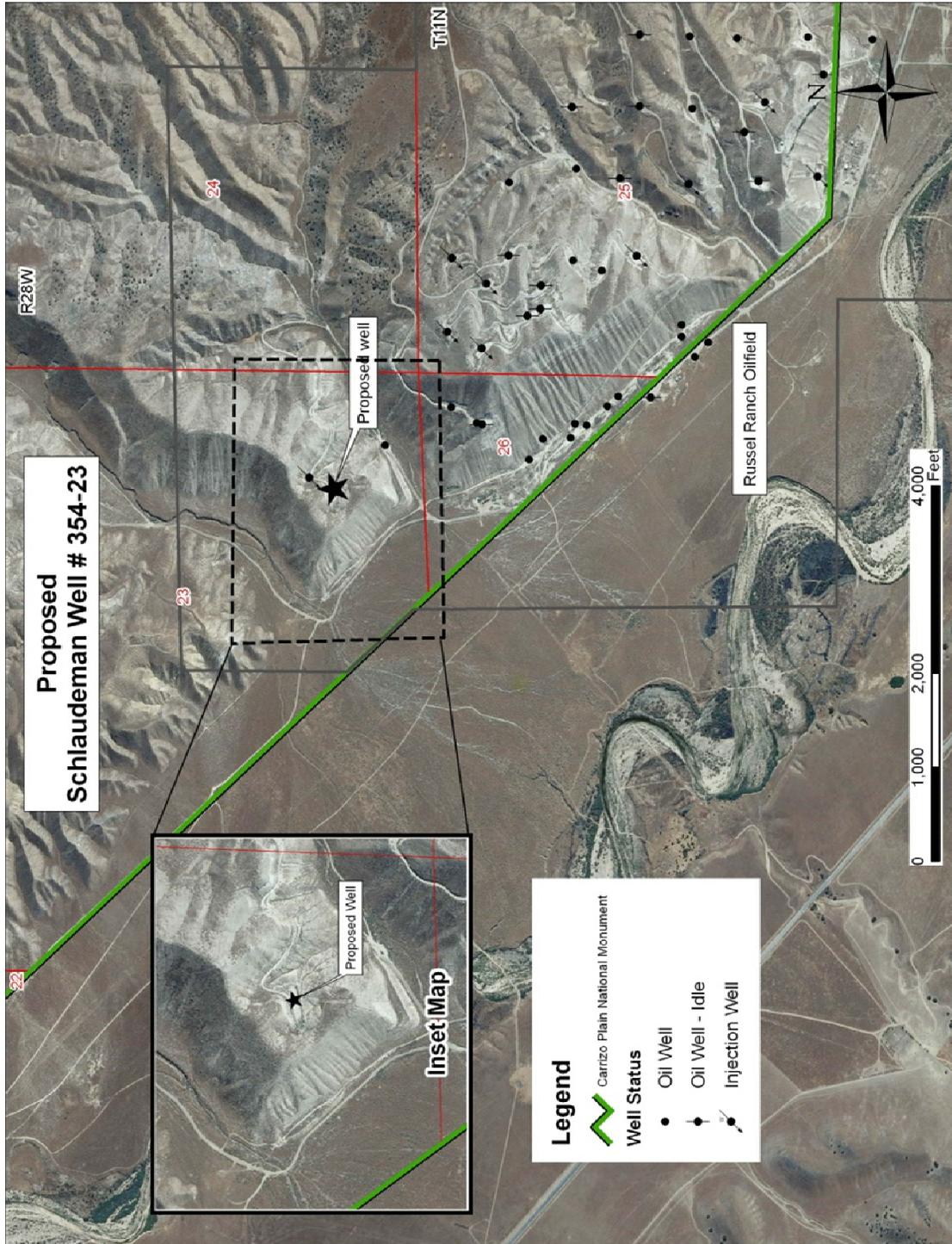
ALTERNATIVE 2: NO ACTION

BLM would not approve the one APD for new well: Schlaudeman #354-23 submitted by E&B. By denying the applications, the federal lessee/operator would be denied the opportunity or right to develop and produce the federal mineral estate.

ALTERNATIVE 3: ALTERNATIVE FLOWLINE ROUTE

This alternative was developed to address the visual resource management issue that would arise from a visible above ground pipeline within the CPNM. The BLM would approve the APD, use of the existing pad and access road(s) as well as the proposed drill operations and site reclamation, however, BLM would require that if the existing oil production flowline does not pass hydrostatic testing that the replacement flowline be buried in the existing roadway from the well pad and tie into the group line near well Schlaudeman #78-23. The total distance of the replacement production pipeline would be 0.77 miles (Map 2).

Map1: Map of proposed location of Schlaudemman Well #354-23.



Map 2: Map of proposed flowline route and Alternative 3 flowline route.



Design Features/Conditions of Approval (COAs) Associated with all Action Alternatives

The following design features would be included as additional conditions of approval:

Biological Monitoring

A qualified biologist will be required to present a sensitive species training session for all construction personnel prior to project implementation to educate workers and participants on sensitive species identification, their habitats and any mitigation measures, stipulations, reporting requirements and penalties for failure to comply. A biological monitor familiar with sensitive species must be present during construction activities to ensure avoidance of species and habitat features as well as to monitor mitigation compliance. A speed limit of 20mph (max) would be required on the access road to the well pad location. Any open vertical pipes found standing on the existing pad will be removed or capped to prevent bird and other wildlife mortalities.

Cultural and Paleontological Resources

All work at the location must cease if any cultural and/or paleontological resources are encountered during project implementation and the BLM Archaeologist must be notified to identify proper mitigation or avoidance measures. If these remains are Native American, this will include consultation with local tribes regarding these actions.

Construction

No new disturbance to habitat is authorized with this project for any of the action alternatives. All required construction would occur within areas of previous disturbance such as pads and roadways.

Vegetation removal and surface disturbance would be minimized. Surface rehabilitation measures would be applied when needed to protect the soil surface. Hand clearing would be emphasized over heavy equipment.

Soil-disturbing activities would be avoided during periods of runoff, or when soils are wet and muddy, in order to minimize damage.

All surface disturbing activities would be designed to minimize wind and water erosion. Consistency with state air pollution laws would be maintained.

All oilfield activities that occur on land BLM has an interest, whether mineral or surface estate, will be conducted with the least impact practicable to sensitive resources, while still permitting those activities that are legally allowed.

Any area of surface disturbance would be restored to pre-project conditions and stabilized to reduce the potential for erosion.

BLM will require the operator to implement dust abatement measures for the pad and access/egress route during project implementation. Appropriate measures are use of a water truck to apply water to the access/egress roads. No application of chemicals will be allowed for dust abatement.

The operator shall utilize equipment that is appropriate to the scope and scale of work being done for roads and well pads (utilize equipment no larger than needed for the job).

To minimize disturbance, the operator will place the utility corridor (production pipelines) within the roadway or alignment of existing pipelines. All utilities and pipelines should be located low to the ground at the edge of well pads and roads or buried where possible. For Alternative 1, if the existing pipeline lacks structural integrity, the new pipeline will follow the same corridor as the

original pipeline, only above grade. For Alternative 3, the pipeline corridor would be constructed below grade within the existing access/egress road.

All permanent above-ground structures (e.g., production equipment, pipes, tanks, etc.) not subject to safety requirements will be painted to blend with the natural color of the landscape. The paint used will be a color which simulates “Standard Environmental Colors.” BLM and the operator will meet in the field prior to installation of facilities to finalize which color will be used for all above ground structures.

Chapter 3. Affected Environment

This chapter briefly describes the affected environment for elements that may be affected by the proposed action.

The following elements of the human environment were considered but determined to be either not present or unaffected by the proposed action and will therefore not be addressed further in this analysis. This project location does not occur within a designated Area of Critical Environmental Concern. The project does not contain essential fish habitat, and there are no wetlands or riparian zones in the project area. The project would not affect low income or minority populations. And the proposed project would not affect the recreational experience of the visitors of the CPNM.

National Landscape Conservation System (NLCS), including National Monuments

The Carrizo Plain is the largest and most important remnant of what remains of the San Joaquin Valley ecosystem. It provides habitat for numerous threatened, endangered and sensitive species of plants and animals and is the site of the largest remaining alkali wetland in Southern California.

In 2000, the National Landscape Conservation System (NLCS), comprised solely of BLM lands, was created with the mission to “...conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological and scientific values for the benefit of current and future generations.” The NLCS units include BLM-managed: national monuments, national conservation areas, certain national trails, wild & scenic rivers, designated wilderness, and wilderness study areas.

The Carrizo Plain was designated a National Monument on January 17, 2001, at which time it became part of the NLCS. The proclamation established the monument for the purpose of protecting the biological, paleontological, historic and prehistoric resources on approximately 247,000 acres. Specific biological resources of the monument within the Russell Ranch oil field are discussed further in the Biological Resources section of this EA. Specific historic and prehistoric resources are discussed further in the Cultural Resources section. The proclamation further states that, “Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the monument.”

The proposed new well, Schlaudemman #354-23, is located within the CPNM. A resource management plan (RMP) was developed to provide direction for managing the approximately 247,000 acre CPNM within the context required by the Monument Proclamation and to analyze the environmental effects resulting from implementing the proposed plan alternative, the no action alternative, and two action alternatives.

Since the proposed project does not directly affect the proclamation of the CPNM, and because individual resources will be addressed further, NLCS will not be addressed further in this analysis.

Cultural Resources

The Cuyama Valley, which the proposed project area overlooks, lies primarily within the traditional Native American territory of the Northern Chumash tribe. There is evidence that members of the Salinan tribe may have also occupied the northern portions of the Cuyama Valley. Archaeological evidence indicates that these people occupied this region for a considerable length of time. The remains of several large village sites have been recorded along the banks of the Cuyama River. The Carrizo Plain lies immediately northeast of the proposed project area on the opposite side of the Caliente Mountains, contains many significant Native American heritage sites.

Beginning in the 18th century with the Spanish period, Anglo occupation and use of the Cuyama Valley has long focused upon ranching. By the early 20th century, the oil boom that originated in the neighboring San Joaquin Valley reached portions of the Cuyama Valley. Historic period cultural sites found throughout the area include the remains of structures and infrastructure associated with these uses.

A Class III (intensive) cultural resources inventory (BLM CRIR# LLCAC06000-821) was conducted for the proposed project area. The proposed project area consists of an existing well pad and road for which there were no earlier records indicating that this location had been surveyed for the presence of cultural sites. No cultural sites were discovered as a result of the survey of the proposed project area. However, ground disturbing actions can reveal previously unidentified buried cultural resources. As a result, Conditions of Approval (COA) are included with this authorization which state that in the event that cultural resources are discovered during the course of this project, all work must cease in the vicinity of the discovery and the BLM Archaeologist must be notified in order to identify proper mitigation or avoidance measures. If these remains are Native American, this will include consultation with local tribes regarding these actions.

Since all action alternatives will not have direct affects to cultural resources, they will not be addressed further in this analysis.

Native American Values

The proposed project area lies primarily within the traditional territory of the Northern Chumash tribe. There is also some evidence that members of the Salinan tribe may have also occupied the northern portion of the Cuyama Valley. The San Joaquin Valley Yokuts tribes also occupied the Carrizo Plain immediately to northeast. The proposed project area is located within the boundaries of the Carrizo Plain National Monument (CPNM). The Carrizo Plain itself, which lies immediately east of the proposed project area, contains many significant Native American heritage sites. The BLM closely coordinates with members of the local Native American community and the Carrizo Plain Native American Advisory Committee for all actions occurring within the CPNM. These people place significant value on their traditional heritage sites. These places include historical and spiritual sites as well as resource use areas such as locations where traditional plant resources are gathered.

A certified letter containing a description of the proposed project and a map showing its location was mailed to members of the local Native American community with traditional ties to the proposed project area location and the chairman and other participants in the Carrizo Plain Native American Advisory Committee, requesting information regarding any places of traditional importance to these groups that may be impacted by this proposed project. One of the recipients, Mr. Freddy Romero, the Cultural Resource Specialist for the Elders Council of the Santa Ynez Band of Chumash Indians, called to obtain details regarding the nature and location of the proposed project. Based upon this information, he stated that his council had no concerns regarding this project. None of the other recipients of these letters

indicated that any places of traditional cultural or religious importance will be affected by the proposed project.

Since all action alternatives will not have direct affects to Native American values, they will not be addressed further in this analysis.

Paleontological Resources

The proposed project area is located within an area with moderate to high sensitivity for the occurrence of significant paleontological resources. However, due to the location of this proposed project on a previously constructed well pad and within areas of existing disturbance, no potentially significant paleontological deposits will be impacted during the course of proposed project construction or maintenance.

Since all action alternatives will not have direct affects to paleontological resources, they will not be addressed further in this analysis.

Visual Resource Management

The Visual Resource Inventory (VRI) conducted for the CPNM RMP assigned Class III to the portion of the Caliente Mountain South subregion containing the project area. In determining the VRI classification, the factors of relative scenic quality, level of viewer sensitivity to landscape change, and distance of an area from points or corridors of high viewer sensitivity. The Caliente Mountain South subregion was considered to be typical of landscapes in the inner coast range with low viewer sensitivity to landscape changes. The CPNM RMP (page II-52) designates the area including the Russell Ranch Oil Fields as Visual Resource Management (VRM) Class II. The objective for VRM Class II is to retain the existing character of the landscape meaning the level of change should be low and those management activities that can be seen should not attract the attention of the casual observer.

The project area is within a previously disturbed landscape, typical of oil fields, with multiple routes and industrial development. All action alternatives would add additional visual impacts to the site. Not only the equipment associated with the drilling of the well but the long term placement of equipment used for oil extraction. Any time the line color and texture of a landscape is changed it causes the human eye to be attracted to the change. Not only will there be a change of the line color and texture but there will be movement at the site. Vehicle movement and movement of the extraction equipment will be seen. As far as the above ground flow line, it would also cause a visual impact. The pipe that would be running vertically up and down the landscape and adding a new line to the landscape which could draw the visitors' eye to the site. Depending on the color of the equipment it also could cause a visual impact. The temporary drilling equipment will not have a long time impact but the extraction equipment will be a long term part of the landscape.

The key observation points (KOP) would be from Highway 166 over one mile away. Travelers on Hwy 166 traveling at highway speeds (55+ MPH). The project would only be visible for a short period of time at nearly a 90 degree angel from Hwy 166. The casual viewer's eye would not be drawn to the area of the well pad. Since there are no KOP's where the project would catch the eye of the casual visitor there are no contrast rating sheets done.

Since all action alternatives will not have direct affects to the casual observer and therefore to visual resources, they will not be addressed further in this analysis.

Air Quality

At the federal level, air regulatory duties lie with the U.S. Environmental Protection Agency (EPA), Region IX. The BLM has air program responsibilities through its permitting programs and Clean Air Act (CAA) requirements to analyze all actions for conformity to air quality plans. At the state level, air regulatory duties lie with the California Air Resources Board (CARB); however, oversight authority for air quality matters in California has been delegated to the county (District) level. The proposed action is located in San Luis Obispo County, California, within jurisdiction of the San Luis Obispo Air Pollution Control District (APCD).

The federal Clean Air Act (CAA), as amended, and the California Clean Air Act (CCAA) contain the primary provisions relating to air quality. The U.S. EPA, CARB, and regional air districts have issued rules to implement federal and state Clean Air Acts. Provisions of the federal CAA that apply to BLM actions include the National Ambient Air Quality Standards (NAAQS), nonattainment area designation, the development of state implementation plans (SIPs), prevention of significant deterioration (PSD), air toxics, and federal conformity. The BLM does not have any ongoing operations in the CPNM that require air quality permits from the federal or state government, or local air district.

EPA uses "criteria pollutants" as indicators of air quality, and has established for each of them a maximum concentration above which adverse effects may occur. These threshold concentrations are called NAAQS. While one set of limits (primary standard) protects health, another set of limits (secondary standard) is intended to prevent environmental and property damage. Under the federal CAA, the U.S. EPA has established NAAQS for seven criteria pollutants: ozone, respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), carbon monoxide, nitrogen dioxide, lead, and sulfur dioxide. California has established state Ambient Air Quality Standards for the same criteria pollutants, plus an additional 3 pollutants (visibility reducing particulates, sulfates, and hydrogen sulfide). States may have standards that are more restrictive than the federal thresholds, but they cannot be less restrictive. Although more stringent, the State standards have no specific dates to attain, unlike federal standards. Under State law, designations are made by pollutant, rather than by averaging time. A geographic area that meets or exceeds the primary standard is called an attainment area; areas that do not meet the primary standard are called nonattainment areas (<http://www.epa.gov/air/oaqps/greenbk/index.html>).

San Luis Obispo County is in attainment with all NAAQS; the county is designated as Unclassifiable/attainment for PM₁₀, PM_{2.5}, and ozone (8-hour). Under the stricter state standard however, San Luis Obispo County is designated non-attainment with state standards for ozone and PM₁₀. The air quality trend in San Luis Obispo County has been mixed, with ozone levels being reclassified from attainment to non-attainment, and PM_{2.5} moving from unclassified to attainment between 2003 and 2006. Air quality in the CPNM is generally good; due to its extremely low population density, little industry, and few major transportation corridors the CPNM is not considered a source or concentration area for air pollution. Dust generated from road use and maintenance activities is one of the primary unregulated sources of air pollution that can originate on public lands in the CPNM. Lease actions within the Russell Ranch Oilfield are subject to compliance with current San Luis Obispo APCD rules and regulations.

Soils

Project area soils are described in the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) soil survey of Northern Santa Barbara Area, California. Soils are classified as Rough Broken Lands (RuG); terrain is typically steep to extremely steep, with shallow soil material over sandstone or semi-consolidated material. The RuG map unit occurs on slopes ranging from 30 to 90 percent. Rough Broken Lands are Hydrologic Group D soils, which are excessively drained, have very high surface runoff and a high potential erosion hazard. NRCS soil interpretations indicate these soils are poorly suited for roads, limited primarily by slope. However, the existing well pad (#RRU 77-23) and unpaved lease access roads were constructed

more than 50 years ago and appeared relatively stable during 2011 lease inspections completed by BLM staff.

There are no wetlands in the project area, and no soils in the project area are designated as Prime Farm Lands.

Water Quality

The proposed action occurs in the Central Coast Hydrologic Region. There are no rivers, lakes, or streams in the project area that contain surface water year round. There is one intermittent blue-line drainage located approximately 800-ft from the proposed project location. The project area is underlain by the Cuyama Valley Groundwater Basin which underlies an east-trending valley bounded on the north by the Caliente Range and on the southwest by the Sierra Madre Mountains. Cuyama Valley is drained by the Cuyama River, which occurs south of the proposed action and CPNM boundary. Groundwater within the basin is mainly unconfined, and makes up 100 percent of water supply for Cuyama Valley agriculture, petroleum operations, businesses, and homes, with 95% of use attributed to agriculture. Agricultural water use began in 1938 and has since progressively increased; monitoring of groundwater trends indicates that levels have dropped up to 300 feet during the last 40 to 50 years (DWR 1998). Groundwater near the Caliente Range is noted for high salinity, and water quality has generally been deteriorating in the basin as a result of constant cycling and evaporation of irrigation water.

Although no groundwater management plan has been initiated, the Santa Barbara County Water Agency and the USGS have partnered to complete the Cuyama Valley water availability study (<http://ca.water.usgs.gov/projects/cuyama/>). Because the Cuyama Valley is a sole-source aquifer it will be important to further define the water-bearing and water-quality properties of the basin for sustainable management of water resources in the area.

Biological Resources

Vegetation in the vicinity of the well consists of open saltbush scrub with non-native grasses and assorted native annuals, especially those adapted to dry, shale-derived soils. The proposed well location is within an existing pad, with no vegetation other than some scattered weedy grasses and a few saltbush seedlings. The slope below the pad (potential pipeline route) has saltbush scrub vegetation. Species in the saltbush vegetation includes native plants such as common saltbush (*Atriplex polycarpa*), snakeweed (*Gutierrezia californica*), chia (*Salvia columbaria*), blazing star (*Mentzelia pectinata*), annual buckwheats (*Eriogonum* spp.) and lupines (*Lupinus* spp.). Non-native plants present includes species such as red brome, (*Bromus madritensis* var. *rubens*), filaree (*Erodium cicutarium*), Mediterranean grass (*Schimus* spp.), and Russian thistle (*Salsola* sp.). Biological crusts are to be expected in some areas.

The following three rare plants have been found in the vicinity of the proposed project area. As annual species, population numbers vary widely in response to precipitation patterns. In dry years and during the dry months of the year, these species would be present only in the seed bank and not detectable by normal survey techniques.

Kern mallow (*Eremalche parryi* ssp. *kernensis*; Federally Endangered) is a small annual plant for which the exact definition of the species has been a matter of some disagreement. Reports, papers, and taxonomic treatments have varied in the exact description of the species, which populations should be included, and what the “real” distribution is. Recent studies and the online Jepson Manual treatment for Kern mallow indicates that this species occurs both in Kern and San Luis Obispo Counties and includes most, if not all of the pink-flowered *Eremalche* present on the Monument. The species is common on dry slopes in the Monument and would be expected to be present in the area, and possibly within the pipeline

corridor (if following the old pipeline). Kern mallow was federally listed as endangered under the name *Eremalche kernensis*.

Hoover's woolly-star (*Eriastrum hooveri*; Federally Delisted) is a tiny annual phlox that is much more common and widespread than originally thought. The species was delisted on October 7, 2003 (Federal Register 68:57829-57837), but BLM will continue to treat it as a sensitive species per agreement with the USFWS. Known populations of Hoover's woolly-star occur in the Caliente Mountains and would be expected in the vicinity of the project. Hoover's woolly-star is found in grasslands and in saltbush scrub and is usually found in areas with little competing vegetation. In addition, it is found on previously disturbed areas such as lightly used roads, old firebreaks, and abandoned oil well pads. Hoover's woolly-star seed germinates from January to mid-April and the plants typically flower between March and June.

Lemmon's jewelflower (*Caulanthus lemmonii*; BLM Sensitive) is a small annual mustard with maroon and white flowers, growing in grasslands and piñon juniper woodlands. The species has been documented in the Calientes, in the vicinity of the proposed project and would be expected to be growing on the slopes with other native spring wildflowers.

The CPNM is the largest undeveloped remnant of the San Joaquin Valley ecosystem and provides crucial habitat for many endemic plant and animal species. The proposed project lies within the Caliente Mountain South subregion of the CPNM. Inside the Monument, the subregion stretches the entire length of the Caliente Mountain range, encompassing its south-facing slopes. The well pad is located near the western end of the subregion where several other pads and pumping units exist. Wildlife species common for this area include larger mammals such as coyote (*Canis latrans*), black-tailed jack rabbit (*Lepus californicus*) and bobcat (*Lynx rufus*), smaller mammals such as Heermann's kangaroo rat (*Dipodomys heermanni*), pocket gopher and other rodents, reptiles such as Pacific rattlesnake (*Crotalus oreganus*) and side-blotched lizard (*Uta stansburiana*) and a number of common bird species both resident and wintering including California quail (*Callipepla californica*), common raven (*Corvus corax*), sage sparrow (*Amphispiza belli*) and Bewick's wren (*Thryomanes bewickii*). Raptors are common throughout the Carrizo and species such as red-tailed hawk (*Buteo jamaicensis*) and American kestrel (*Falco sparverius*) are commonly seen foraging. At the proposed well site there is little evidence of wildlife.

During two separate site surveys in 2011 and 2012 no burrows were found on the pad. Some gopher and small rodent burrows were found in the berm that surrounds the pad. Several active Heermann's kangaroo rat burrows were found down-slope of the pad. In the roadway leading up to the pad, no burrows were found and only occasional small-rodent burrows belonging to pocket gopher and mouse species were seen in the berms along the edge of the road. Golden eagles (*Aquila* spp.) are likely found in the region but there are no rock outcroppings or other features nearby that could be used as nesting sites. A Loggerhead shrike (*Lanius ludovicianus*) was seen during one site visit in the vicinity of the pad.

The CPNM offers refuge to federally and state listed threatened and endangered species and BLM sensitive species including: San Joaquin kit fox (*Vulpes macrotis mutica*; Federally endangered), California condor (*Gymnogyps californianus*; Federally endangered), blunt-nosed leopard lizard (*Gambelia sila*; Federally endangered), giant kangaroo rat (*Dipodomys ingens*; Federally endangered), San Joaquin antelope squirrel (*Ammospermophilus nelson*; BLM sensitive), longhorn fairy shrimp (*Branchinecta longiantenna*; Federally endangered), and Kern primrose sphinx moth (*Euproserpinus euterpe*; Federally threatened). Populations of pronghorn antelope (*Antilocapra americana*; BLM featured species) and Tule elk (*Cervus elaphus nannodes*; BLM featured species), previously extirpated from the Plain have been reintroduced to the CPNM.

For many listed and sensitive species this habitat is marginal. Topographic features and impacts most likely resulting from decades of human activities within the greater Cuyama Valley have resulted in

limited sightings in the region as a whole. CNDDDB records indicate that only giant kangaroo rat and San Joaquin kit fox were sighted near the project area dating back to the mid-1970s to 1982. No recent sightings have occurred. More recently, aerial surveys conducted by the California Department of Fish and Game (CDFG), in 2010 and 2011 did not show any presence of giant kangaroo rat (Bean, 2011). During field surveys of the site completed by BLM biologists J. Hodge, L. Ashley and K. Sharum, in addition to previous surveys by BLM personnel, there were no observations of giant kangaroo rat or San Joaquin kit fox, nor was there any sign of their presence. San Joaquin antelope squirrels are known to the area and were observed on the access road to the pad site.

The Monument is historically known as a foraging site for California condor however, recent records show the nearest sightings to be several miles from the proposed well site. According to USFWS, condors have not been known to visit any of the pumps that make up the Russell Ranch Oil Field. In 2010 one condor was tracked to a location approximately seven to ten miles west of the proposed well site (USFWS, 2011). Possibly attracted to a dead calf and/or deer, the bird stayed at the site over a period of three days, and then left the area. In 2009 several locations were chosen as potential sites for condor feeding stations within the Chimineas Ranch unit of the CDFG. The unit shares much of the western boundary of the Monument and is located approximately five miles from the proposed project area. Should the USFWS construct a feeding station(s) within the Chimineas Ranch, the potential exists for more frequent use by condors of the region.

The USFWS has also developed the *Recovery Plan for Upland Species of the San Joaquin Valley, California* (U.S. Fish & Wildlife Service, 1998), identifying the CPNM as being one of several “Core Area of Natural Lands” targeted for protection. The CPNM is listed as important for the conservation and recovery of, blunt-nosed leopard lizard, giant kangaroo rat, San Joaquin antelope squirrel, San Joaquin kit fox, short-nosed kangaroo rat, Tulare grasshopper mouse, San Joaquin Le Conte’s thrasher,. The CPNM also has important habitat for federally listed primrose sphinx moth, longhorn fairy shrimp, and California condor. This recovery plan includes actions to maintain linkages between the CPNM, western Kern County, and the Salinas Valley.

Grazing Management

The project area falls within the Selby Ranch grazing allotment, #00044. The allotment is authorized for use by cattle during December through May each year as resource conditions allow.

Chapter 4. Environmental Impacts

Air quality

Proposed Action:

Project emissions include NO_x, VOCs/ROG, PM₁₀ and PM_{2.5} associated with combustion sources such as diesel drill rig engines, drill pad construction equipment (i.e., dozers, backhoe, grader, etc.), temporary production flare(s), remedial well work, equipment trucks, hauling of liquids, drill rig crew trucks/vehicles, portable lift equipment, portable testing equipment and temporary production facilities. Heavy equipment and support vehicle use on unpaved access roads will generate small amounts of particulate emissions and could carry soils onto paved roads which would increase entrainment PM-10 emissions. In addition, vehicles and heavy equipment emit various precursor emissions for ozone. Ozone precursor emissions (NO_x and VOCs) will be reduced during drilling by utilizing a closed loop system as proposed.

Standard Operating Procedures (SOPs) or measures commonly used to abate fugitive dust during

construction include watering unpaved access roads, watering prior to excavation and trenching, and during backfilling while compacting. Direct emissions from the proposed action will be localized and impacts to air quality will be minor, and temporary in duration. By implementing project design features and measures to minimize fugitive dust, project impacts would be reduced to negligible levels.

Since the proposed action occurs in an area designated attainment, no formal conformity analysis or determination is required (40 CFR Part 93.153).

No Action:

There would be no additional impacts to air quality from the no action alternative.

Alternative 3:

This alternative would result in air quality impacts similar to those described under Alternative 1. If the existing production pipeline were to fail hydrostatic testing, additional particulate emissions would occur during pipeline installation as a result of excavation and trenching activities within the unpaved roadway. By implementing SOPs to reduce fugitive dust emissions (e.g. application of water on roadways, and during excavation, trenching, compacting, and backfilling activities) impacts to air quality would be reduced to negligible levels.

Soils

Proposed Action:

Direct impacts to soils would be limited to compaction in areas where sleepers would be required for pipeline placement above ground. Since the project is less than 1.0 acre in size, the project is not subject to the State of California's Storm Water Pollution Prevention Plan (SWPPP) General Permit requirements. However, the intensity of both onsite and offsite effects of soil disturbance can be minimized by implementing basic principles of erosion control on construction sites, such as the State approved BMPs (Management Measures) for erosion, and the EPA's *Guidance Document, Reasonable and Prudent Practices for Stabilization (RAPPS) of Oil and Gas Construction Sites* (EPA 2004). Application of the BLM SOPs and Implementation Guidelines for Projects Affecting the Biological Environment, and the Minerals SOPs/BMPs/Implementation Guidelines and Conditions of Approval would protect sensitive resources, thereby minimizing adverse impacts to soils.

No Action:

There would be no additional impacts to soil from the no action alternative.

Alternative 3:

Soils would be directly disturbed within the existing unpaved access road from trenching activities during below grade pipeline installation. Subsequent to pipeline installation, the disturbed soil surface will be stabilized by using water during backfilling and compaction. Since the project is less than 1.0 acre in size, the project is not subject to the State of California's Storm Water Pollution Prevention Plan (SWPPP) General Permit requirements. However, the intensity of both onsite and offsite effects of soil disturbance can be minimized by implementing basic principles of erosion control on construction sites, such as the State approved BMPs (Management Measures) for erosion, and the EPA's *Guidance Document, Reasonable and Prudent Practices for Stabilization (RAPPS) of Oil and Gas Construction Sites* (EPA 2004). Application of the BLM SOPs and Implementation Guidelines for Projects Affecting the Biological Environment, and the Minerals SOPs/BMPs/Implementation Guidelines and Conditions of Approval would protect sensitive resources, thereby minimizing adverse impacts to soils.

Water Quality

Proposed Action:

Given the nature of the proposed action, no direct impacts to surface waters are anticipated. Impacts to groundwater quantity from the proposed action are unknown. Since the project is less than 1.0 acre in size, the project is not subject to the State of California's General Permit requirements for Construction, however, water quality would be protected by implementing basic principles of erosion control on construction sites, such as the State approved BMPs (Management Measures) for erosion and the EPA's *Guidance Document, Reasonable and Prudent Practices for Stabilization (RAPPS) of Oil and Gas Construction Sites* (EPA 2004). Application of the BLM SOPs and Implementation Guidelines for Projects Affecting the Biological Environment, and the Minerals SOPs/BMPs/Implementation Guidelines and Conditions of Approval would protect sensitive resources, thereby minimizing adverse impacts to water resources.

No Action:

There would be no impacts to water quality from the no action alternative.

Alternative 3:

This alternative would result in water resource impacts similar to those described under Alternative 1.

Biological Resources**Proposed Action:**

The installation of the new well, by itself, would not destroy existing habitat. If a new pipeline needs to be installed, a small amount of temporary ground disturbance would be expected. The disturbance footprint would be limited to areas traversed by workers installing the pipeline and the pipeline itself. Nearby vegetation may also be impacted by the dust generated by the well and pipeline installation and by the increased use of the access road by company vehicles.

The proposed action is consistent with the CPNM-RMP Action items 1 and 8, as they relate to biological resources. The project is proposed to utilize an existing pad and production line so as to reduce hazards to wildlife and will follow industry standards for SOP's, BMP's, and Implementation guidelines for project implementation. In the event that the existing production line does not have structural integrity and a new production line is needed, it will be constructed above ground and pushed/pulled into the existing pipeline corridor to reduce the potential for impacts to biological resources. While this alternative is consistent with Action item 8, an above ground pipeline does have the potential to fragment habitat, though long term effects would be expected to be minimal.

Special Status plants have some potential to occur on the site, and with seasonal/annual variability it can be difficult to tell if the site actually contains the target species. Annual populations move around in time and space, are mostly present as seeds in the seed bank, and may only be evident in good years. Because of this, and in light of the limited surveys done, we cannot discount the possibility that Kern mallow, Hoover's woolly-star, and Lemmon's jewelflower are present within the vicinity of the project area and may be impacted by the proposed development. However, since the well development would occur solely on areas of existing disturbance no significant impacts would be expected. There may be a tiny amount of temporary disturbance due to the installation of a new pipeline, if it becomes necessary to replace the existing line, but this should not impact native vegetation including listed species.

Well installation on the existing pad would result in few to no impacts to wildlife species. Since no burrows were sighted on the pad itself, burrowing animals will not be impacted. Activities including vehicle traffic, transportation of equipment, and other human activities on and around the pad may result in the disturbance, collapse or destruction of burrows in the berm surrounding the pad. Some species may

be inadvertently killed by vehicles travelling to and from the site. Noise from well installation is likely to cause a temporary disturbance to wildlife in the general area. Any night-time activities may temporarily disrupt natural activities for nocturnal species utilizing the surrounding area and may disrupt birds from sleeping causing disorientation and possible predation. If a new flowline is required, existing burrows in the path of the line may also be disturbed or collapsed during installation, inadvertently crushing or entombing individuals. No federally listed species are expected to be impacted by these activities. In the event that listed species may be impacted, mitigation measures put in place will greatly minimize any impacts to giant kangaroo rat, blunt-nosed leopard lizard, San Joaquin kit fox and California condor. San Joaquin antelope squirrel (California threatened species) is known to occur in the general vicinity of the proposed well pad site, and several were observed on the access road to the pad location. Any burrows suspected of harboring antelope squirrels found in the path of the new flowline will be flagged for avoidance. Other BMP's such as 20 mph speed limits and checking underneath vehicles prior to driving would greatly reduce potential impacts to antelope squirrel. Loggerhead shrike is also known to occur at the project site. If nesting behavior is detected, timing of the project will be planned to occur outside the nesting period (January through July), to the extent practical. If not practical, other measures will be taken to avoid impacting the nest and nesting activities as much as possible.

No Action:

There would be no impacts to vegetation or wildlife as a result of the no action alternative.

Alternative 3:

While project activities would increase in intensity along the access road and duration during the installation of the production line, this alternative would be expected to have the same impacts to biological resources as the proposed action during project implementation. There would be no impacts to burrows in and around the path of the above-ground flowline. The potential long term effects to species would be reduced under this alternative since a buried flowline would be less likely to fragment habitat and to have affects to biological resources. Vegetation would not be impacted directly from the actions described under alternative 3; however some plants near the pad and access road may be impacted by dust generated by the project.

Grazing Management

Proposed Action:

The proposed action may cause disturbance to livestock distribution within the immediate area surrounding the well site. These disturbances are expected to be minor and not cause any substantial impacts to livestock grazing operations or opportunities on the allotment.

No Action:

There would be no impacts to livestock grazing management as result of the no action alternative.

Alternative 3:

This alternative would have the same impacts to livestock grazing management as the proposed action.

CUMULATIVE IMPACTS

Air Quality

The cumulative effects analysis area for air resources is the San Luis Obispo air district, in the South Coast air basin. This area includes the area federally designated Unclassified/attainment for NAAQS, and the State PM and ozone nonattainment areas. Neither the proposed action nor any of the alternatives are anticipated to result in a substantial increase in criteria pollutant emissions and is not likely to result in or contribute to exceedance of the National Ambient Air Quality Standards. Therefore, none of the alternatives would contribute to cumulative effects to air quality in the South Coast air basin or the CPNM.

Soil Resources

The direct and indirect effects of the proposed action are limited to less than 1.0 acre of temporary disturbance associated with below grade pipeline installation under Alternative 3. Watering during trenching and backfilling, and proper compaction during pipeline installation will minimize the potential for accelerated erosion. The potential for accelerated erosion would be further mitigated by implementing BLM best management practices and basic principles of erosion control. Since portions of the lease are currently disturbed by past oilfield development, the project effects on soils are not anticipated to cumulatively impact soils in the vicinity or region as a result of Alternatives 1, 2, or 3.

Water Resources

Although no direct impacts to water quality are anticipated as a result of the proposed action, any potential indirect effects would be mitigated by implementing industry SOPs and BMPs to protect water quality. Based on the nature of the proposed action, there is a low potential for long term cumulative impacts to water quality as a result of Alternatives 1, 2, or 3.

Biological Resources

No direct or indirect impacts to threatened and/or endangered species or BLM sensitive species are expected with either Alternatives 1, 2, or 3. Since no impacts to federally listed species are anticipated, E&B would not be required to obtain a Section 7 consultation. If impacts to federally listed species cannot be avoided than project activities that may affect listed species will be halted and BLM would require E&B to obtain a Biological Opinion from USFWS prior to continuation of project activities. As a result, there is a low potential for long term cumulative impacts to biological resources as result of Alternatives 1, 2, or 3.

Grazing Management

There will be no impacts to the livestock grazing operation or opportunities on the allotment as a result of the project; as a result of Alternatives 1, 2, or 3, there will be no cumulative impacts on these resources.

Visual Resources

Since the proposed project (Alternative 1 and 3) meets with the VRM Class III objectives assigned to the project site; as a result of Alternatives 1, 2, or 3, there would be no cumulative impacts to VRM.

Chapter 5. Consultation and Public Involvement

Native American Consultation

Certified letters containing a description of the proposed project and a map of the location were mailed to both federally and non-federally recognized tribes and members of the Native American community with known cultural affiliation to the project area and the Carrizo Plain National Monument. One of the recipients, Mr. Freddy Romero, the Cultural Resource Specialist for the Elders Council of the Santa Ynez Band of Chumash Indians, called to obtain details regarding the nature and location of the proposed project. Based upon this information, he stated that his council had no concerns regarding this project.

None of the recipients indicated that this project would impact places associated with Native American traditional cultural or religious values.

The following entities were notified:

Mr. Ryan Garfield, Chairman, Tule River Reservation
Ms. Kerri Vera, Director, Environmental Program, Tule River Reservation
Mr. Ruben Barrios, Chairman, Santa Rosa Rancheria
Mr. Lalo Franco, Cultural Resources Program Director, Santa Rosa Rancheria
Mr. Vincent Arment, Chairman, Santa Ynez Band of Cumash Indians
Mr. Joe Talaugon, Chairman, Elders Council, Santa Ynez Band of Cumash Indians
Mr. Freddy Romero, Cultural Resources Specialist, Elders Council, Santa Ynez Band of Cumash Indians
Mr. Michael Khus-Zarate, Chairman, Carrizo Plain Native American Advisory Committee
Mr. Robert Duckworth, Vice-Chairman, Carrizo Plain Native American Advisory Committee and Salinan Representative
Mr. Fred Collins, Northern Chumash Tribal Council

Biological Consultation

Formal consultation was completed on the Carrizo RMP and an April 2, 2010 Biological Opinion (81420-2010-F-0089) was issued. The Carrizo RMP Biological Opinion provides ESA compliance for the Carrizo RMP and certain project level actions taken to implement the RMP, including the proposed action evaluated by this NEPA document. The Carrizo RMP BO contains measures for conserving listed species and their habitats that have been incorporated into the proposed action.

Per CPNM RMP, *Action BIO-2(S)*: When necessary [i.e.: any oil and gas related action within the CPNM that BLM determines to have a “may affect determination” to federally listed threatened or endangered species], oil and gas related actions will require individual Section 7 consultations. Programmatic consultations will not be used for oil and gas related actions. P. II-18.

The BLM has made an Effects Determination of “no affect” to listed Threatened or Endangered Species associated with the proposed project.

Persons, groups, and agencies consulted

Tim Smith, Bakersfield Field Office Manager
Gabriel Garcia, Assistant Field Manager, Minerals
Steve Larson, Assistant Field Manager, Resources
Johna Hurl, Carrizo Plain National Monument Manager
Silvet Holcomb, Petroleum Engineer
Kim Kelley, E&B Environmental Coordinator
Ed Fetterman, E&B Natural Resources

Summary of Public Participation

The BLM posts copies of each Application for Permit to Drill (APDs) in the front lobby of the Bakersfield Field Office for a 30-day period.

The BLM posted a copy of the Proposed Action and Alternatives on the BLM-Bakersfield website for public comment for an additional 15-day period. One comment letter was received from Los Padres

Forest Watch. While the letter did not identify specific issues (points of dispute, debate, or disagreement on the impacts of implementing the proposed action or one of the alternatives), it included some concerns regarding the APD approval process. These comments and the BLM's response to them are included in Appendix 1.

The BLM will post the NEPA document on the BLM-Bakersfield and BLM-CPNM webpages for a 30-day public posting period after recording the Record of Decision.

List of Preparers

John Hodge, Natural Resource Specialist
Lisa Ashley, Natural Resource Specialist
Tamara Whitley, Archaeologist
Karen Doran, Rangeland Management Specialist
Denis Kearns, Botanist
Kathy Sharum, Wildlife Biologist
Ryan Cooper, Recreation Planner
Sue Porter, NEPA Coordinator

REFERENCES

Carrizo Plain National Monument Resource Management Plan, April 2010.

Bean, W., J. Brashares, and S. Butterfield. 2011. Monitoring and modeling the distribution of giant kangaroo rats in Carrizo Plain National Monument, Annual Report. Prepared by W. Bean. Internal Document.

<http://www.arb.ca.gov/desig/desig.htm> (accessed 11/16/2009)

Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Soil Survey Geographic (SSURGO) Database for Northern Santa Barbara Area, California. Available online at <http://soildatamart.nrcs.usda.gov>. Accessed 12/16/2011.

U.S. Environmental Protection Agency (EPA), 2004. Guidance Document Reasonable and Prudent Practices for Stabilization (RAPPS) of Oil and Gas Construction Sites. Prepared by Horizon Environmental Services, Inc. April 2004.

U.S. Fish and Wildlife Service (USFWS). Recovery Plan for Upland Species of the San Joaquin Valley, California. 1998.

U.S. Fish and Wildlife Service (USFWS). 2011. Condor #112 tracking information September 2010. Internal Document.

Appendix 1
Forest Watch Response from 15 Day Public Comment Posting

Includes:
Forest Watch Comment Letter
BLM Response to Comments

BLM Response to Forest Watch Comments

Comment #1

It is unclear whether the BLM conducted any NEPA analysis for the proposed oil well.

BLM Response to Comment #1

The 15-day public posting for comment was a scoping notice to inform the public about E&B Natural Resources Management's proposal to drill one new oil well; Schlaudeman #354-23, within the Carrizo Plain National Monument. This public scoping was completed to solicit public concerns as part of the NEPA process prior to analyzing the proposed actions and alternatives.

Comment #2

The referenced documents are not available on the BLM's website.

BLM Response to Comment #2

The documents referenced in the stakeholder letter included: an introduction, proposed action and alternatives, first page of the APD, a photo of the proposed well location, and location map. The package was linked to both the BLM-Bakersfield and BLM-Carrizo Plains National Monument webpages on November 16, 2011 with each site linking to the document.

The web link on both the BLM-Bakersfield and BLM-Carrizo Plain National Monument websites appears to be working properly, and BLM is not aware of any difficulties by others to access the site.

Comment #3

It is unclear whether the APD includes a Surface Use Plan of Operations.

BLM Response to Comment #3

The Application for Permit to Drill submitted by E&B Natural Resources contained all components required under Federal Onshore Order #1, including a Surface Use Plan of Operations (SUPO) (Federal Register/Vol. 72, No. 44/ pg.10330-10334). While the SUPO was included with the APD it was not included in the public scoping notice. Rather the information contained in the SUPO was included in the description of the Proposed Action.

Comment #4

It is unclear whether BLM has complied with the consultation provisions of section 7 of the Federal Endangered Species Act.

BLM Response to Comment #4

While not specifically addressed in the public scoping notice, the CPNM-RMP *Action BIO-2(S)* (pg. II-18) stipulates that "When necessary, oil and gas related actions will require individual Section 7 consultations. Programmatic consultations will not be used for oil and gas related actions." Therefore, any oil and gas related action within the CPNM that has the potential for adverse impacts to threatened and endangered species would require formal consultation.

Based on the analysis in the EA, the BLM has made a "no affect determination" for federally listed species associated with the proposed action, because the proposed project would occur on

previously disturbed areas, lack disturbance to vegetation and burrows, and the distance to nearest recorded California condor sighting (EA, pg. 13).

Comment #5

It is unclear whether the proposed well complies with BLMs regulations, the Carrizo Plain National Monument Resource Management Plan, and Onshore Order #1.

BLM Response to Comment #5

The EA describes in detail how proposed project complies with BLM regulations (pg. 2-3), the CPNM-RMP (pg. 1-3, 9), and Onshore Order #1 (pg. 2), as well as other applicable statutes, regulations and other plans.

Comment #6

It is unclear whether the drilling operation includes fracking.

BLM Response to Comment #6

In the Surface Use Plan, E&B does not propose to conduct hydraulic fracturing of the Schlaudemman #354-23 well. In addition, personnel communications with E&B Environmental Coordinator, Kim Kelley, confirmed that fracturing of this well is not planned at this time. This is documented in the Proposed Action (pg. 5) of the EA.