

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior Bureau of Land Management
Grand Junction Field Office, Colorado
ETC Canyon Pipeline Meter Installation - Amend Right-of-Way Grant COC-38522
DOI-BLM-CO-130-2011-0001-DNA

A. Purpose and Need:

ETC Canyon Pipeline, LLC (ETC) desires to set a meter to purchase gas from Augustus's Federal Well Opal 8102-181. The meter should be constructed at this time in order to measure gas flow from the Opal well into ETC's 4 inch buried pipeline that has been authorized under Right-of-Way (ROW) grant COC-38522 since 1985.

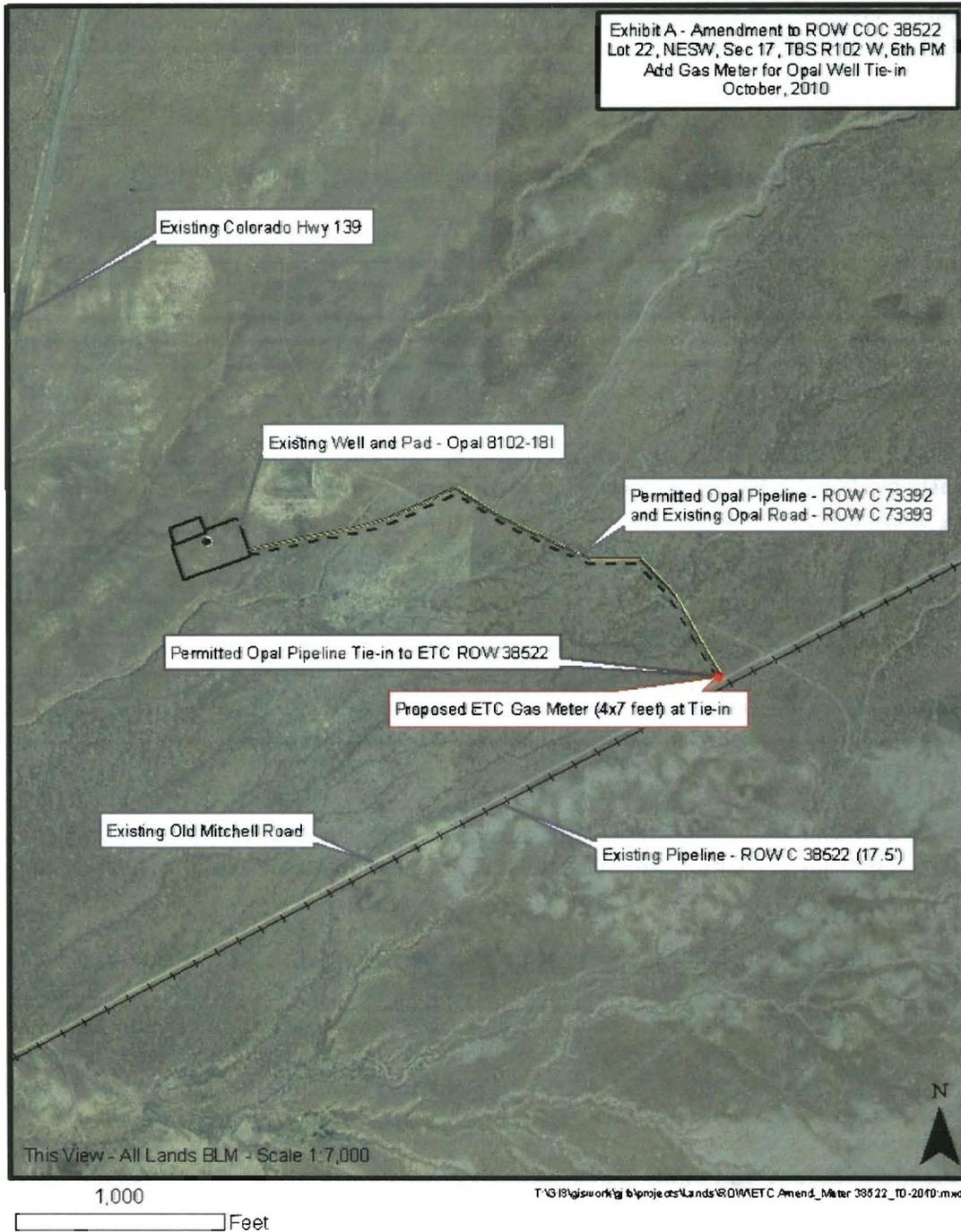
B. Proposed Action:

ETC proposes to amend their existing ROW to include authorization to construct, operate, and maintain a gas meter at their proposed tie-in point for the new gas pipeline from the Opal well. No temporary work space is necessary for construction of the proposed meter and NO new surface disturbance would occur. ETC's proposed meter and installation disturbance would be located entirely within the existing ROW and all work would occur within previous disturbance at a size of about 20 feet long by 20 feet wide. The installed meter would be 15 feet long by 4 feet wide by 7 feet high. A radio would be installed on the site and the meter would be checked every 3 months by an employee who would drive to it in a pickup truck on existing roads.

Construction would begin as soon as the proposal is approved. Construction is estimated to take 2 days and would require approximately 4 workers to be on site. Construction equipment would include a backhoe, 3 one ton pickup trucks and a flat bed gooseneck trailer. Construction would begin by locating the pipeline and then excavating the soil covering the pipe in the location where the meter would be placed. Top soil would be segregated from mineral soil during surface clearing prior to excavation of the pipeline. Once the 4" line was exposed, a 4 inch tee would be welded in with a riser and a blow down. The Meter would be set perpendicular to the 4 inch line, and the Augustus pipeline would tie in to the inlet of this meter. The riser valve would extend above the level of the natural surface and tie into the meter. The meter would be placed on a metal skid and be protected from the weather by a building 4 feet wide by 6 feet long by 7 feet high. All facilities would be painted shale green or as directed to meet BLM requirements.

Once the meter was tied into the pipeline, the mineral soil would be placed back into the trench and the disturbed area would be finally re-graded as closely as possible to the original surface contours. Then the topsoil would be placed back on the surface and the disturbed area would be broadcast seeded with a seed mix specified by the BLM. ETC would follow all required conditions for this process.

All waste material would be hauled and property disposed of in accordance with Federal, State, and local regulations. No waste or unused materials would be disposed of on site.



C. Land Use Plan (LUP) Conformance

LUP Name: Grand Junction Resource Area RMP Date Approved: January 1987

*List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)

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

Decision to Assign Grant COC-38522 to ETC Canyon Gas Pipeline and Categorical Exclusion DOI-BLM-CO-130-2009-48, with updated stipulations added, February and March 2009

Grand Junction Resource Area RMP Environmental Impact Statement, January 1987

Land Report, Decision Record and Supplemental Environmental Assessment (EA) C-38522A, January 1985

Umbrella Pipeline Environmental Assessment Record (EAR), November 1973 (incorporated by reference into EA C-38522-A, above)

E. 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, it is part of the same action previously analyzed. No new surface disturbance would occur. ETC's proposed meter and installation disturbance would be located entirely within the existing ROW and all work would occur within previous disturbance.

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, alternatives analyzed included the No Action Alternative and the Proposed Action. No other alternative is indicated. These alternatives remain valid given current concerns, interest and resource values.

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

Yes, the 2009 addition of Special Stipulations to update resource protections brings them to current BLM and GJFO standards. The RMP/EIS is valid, as is the environmental assessment done at the time the right-of-way was granted. We are not aware of any new information or circumstances that would require modification of either analysis.

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

Yes. We are not aware of any inappropriate methodology or analytical approach in any of the associated documents.

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 associated documents reviewed the many specific potential environmental impacts, including those to air quality, soils, water resources, wildlife, threatened and endangered species, visual resources, and recreational resources, taking into account the diversity of land, plant and animal

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, virtually no new cumulative impacts would accrue from installation of the gas meter.

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 various NEPA processes associated with this gas pipeline right-of-way.

F. Interdisciplinary Analysis: Team members conducting or participating in the NEPA analysis and preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Julia Christiansen	Natural Resource Specialist
Verlene Butts	Land Law Examiner
Bridget Kobe Clayton	Assistant Field Manager
Collin Ewing	Planning & Environmental Coordinator

Conclusion

 X 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.

ETC Canyon Gas Pipeline's ROW grant COC-38522 shall be amended to allow installation of the proposed gas meter.

10-4-10
Date


for Catherine Robertson
Grand Junction Field Manager

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

SITE SPECIFIC STIPULATIONS:

1. Surface facilities shall be painted BLM Standard Environmental Color Shale Green, in a non-reflective finish that blends with the environment.
2. As part of the required reclamation, all disturbed areas shall be seeded with a mixture suitable to specific site conditions, such as below, certified to be weed-free. Application rates are for pure live seed (PLS). Only seed that is viability tested within 9 months pre-purchase, certified for the current year, germinates at a rate of 80% and purity of 90% shall be used. Written Notice describing the completed work, weed-free certification and seed tags shall be submitted to the Field Manager within 30 days of seeding.

<u>Species</u>	<u>Application Rate</u> <u>PLS – Pounds per Acre</u>
Arriba Western wheatgrass	2.2
Sodar Streambank wheatgrass	2.2
Scarlet Globemallow	0.5
Paloma Indian ricegrass	2.4
Rincon or Native Four-wing saltbush	2.0
Shadscale	1.0
10.3 lbs. PLS/acre Total	

Seeding must be completed after October 1, of the first autumn season after construction is completed.

Mulch may also be required to maximize reestablishment of vegetation. Mulch should be crimped into soil or otherwise applied in a manner that ensures that it remains in place.

The area is considered to be satisfactorily reclaimed when:

- A. Soil erosion resulting from the operation has been stabilized.
- B. A vegetative cover at least equal to that present prior to disturbance and a plant species composition at least as desirable as that present prior to disturbance has been established. Establishment of all the species in the seed formula will be considered as meeting the composition/ desirable species criteria.

Additional work shall be required until these conditions are satisfied.

STANDARD RIGHT-OF-WAY STIPULATIONS:

1. The holder shall construct, operate, and maintain the facilities, improvements, and structures within this right-of-way in strict conformity with the proposal approved, amended and made part of the grant. Any relocation, additional construction, or use not in accord with the grant shall not occur without the prior written approval of the BLM.

2. Holder shall make a copy of the complete amended right-of-way grant, including all stipulations and approved proposals, available on the right-of-way area at all times of construction, operation, and termination.
3. The holder shall obtain and comply with all legal Federal, State and County resolutions and regulations and permit requirements.
4. All requirements and stipulations of the grant shall remain in effect and the holder shall construct, operate, maintain and reclaim the pipeline in strict conformity with the submitted application for the right-of-way, drawings and attachments, to grant stipulations and to industry standards.
5. A pre-construction inspection shall be conducted prior to start of construction. Contact the Grand Junction Field Office Manager at least 5 days prior to construction start date to schedule pre-construction inspection of the site.
6. The holder shall obtain agreements allowing construction with all existing rights-of-way holders and pipeline operators, approved in writing, prior to any surface disturbance or construction of the pipeline across or adjacent to any existing rights-of-way or approved pipelines. It is the grant holder's responsibility to coordinate with all other rights-of-way holders and adjacent landowners and resolve any conflicts involved with this project.
7. Contact the Grand Junction Field Office Manager at least 48 hours prior to construction start date.
8. The holder is responsible for obtaining all necessary environmental clearances and permits from all agencies (U.S. Army Corps of Engineers, Colorado Division of Wildlife, U.S. Fish & Wildlife, U.S. Forest Service, Colorado Department of Transportation, Colorado Department of Health & Environment, County Health Department, etc.) before commencing any work under this permit. Without all clearances and permits, this permit shall not be in effect. Holder shall assume all responsibility and liability related to potential environmental hazards encountered in connection with work under this permit.
9. When saturated soil conditions exist on or along the pipeline route, construction shall be halted until soil material dries out or is frozen sufficiently for construction to proceed without undue damage and erosion to soils.
10. All construction equipment and vehicles shall be clean and free of weeds and weed seeds prior to moving equipment onto public lands and start of construction.
11. The holder shall be responsible for inventory, control, and monitoring of all noxious weeds, and weed species of local concern, on any and all disturbed areas within the limits of the right-of-way. A yearly weed control program shall be incorporated into the reclamation program until native vegetation is well established. Holder shall submit a proposal for the weed control program to the BLM Weed Coordinator within one year of construction completion. Control methods shall be in accordance with guidelines established by the EPA, BLM, state and local authorities. Prior to the use of pesticides, holder shall obtain written approval from the BLM Weed Coordinator or Authorized Officer.
12. All existing roads shall be maintained in good condition and shall be returned to a condition as good as or better than before project commencement.

13. Trash shall be confined in a covered container while the project is in progress. Upon completion, all trash, flagging, laths, etc. shall be removed and hauled to an authorized disposal site. No burning or burial of trash, trees, brush or any other material shall be allowed. Human waste shall be properly contained and shall be disposed of at an approved sanitary landfill.
14. The Grand Junction Field Office Manager shall be notified at least 48 hours prior to commencing reclamation work.
15. Prior to reclamation, an inspection of the disturbed area shall be held to review the existing reclamation plan or agree to an updated plan. Contact the Grand Junction Field Office at least 7 days prior to start date to schedule pre-reclamation inspection of the site.
16. Reclamation will be mandatory and completed as required by the BLM, using the seed mix and techniques specified. Prior to commencement of surface reclamation, the authorized officer may modify the seed mix and/or reclamation procedures should it be determined that such modification was expected to result in significant reclamation success.
17. If not already in place, a yearly weed control program shall be incorporated into the reclamation program until native vegetation is well established. The holder shall submit a proposal for the weed control program to the BLM Authorized Officer within one year of construction completion.
18. At the time of buried pipeline installation, surface disturbance shall be limited to the minimum necessary to complete pipeline construction. All construction activities and surface disturbance shall take place within the disturbed width of the permitted construction right-of-way corridor. The exterior limits of the construction shall be flagged on the ground as necessary to prevent disturbance outside of the right-of-way.
19. All topsoil/growth medium and vegetation shall be removed from right-of-way, windrowed and stockpiled separately from spoil material. Topsoil shall only be used for reclamation and shall not be used to bed or pad the pipe during backfilling.
20. All construction and open trenching shall be maintained in a safe and workman-like condition. The pipeline shall be constructed to minimize safety concerns from vehicle use of the roads, as well as any other safety concerns.
21. Pipeline warning signs shall be installed within five days of construction completion and before use of the pipeline for transportation of product. Pipeline warning signs are required at all road crossings. Signs shall be visible from sign to sign along the ROW. For safety purposes each sign shall be permanently marked with the operator's name and shall clearly identify the owner (emergency contact) and purpose (product) of the pipeline.
22. A General Construction Permit from the Colorado Department of Public Health and Environment (CDPHE) is required when one acre or more is to be disturbed. Compliance with the permit requires the preparation and implementation of a Stormwater Management Plan for erosion prevention, systematic monitoring of the site, establishment of positive, directed run-off management and implementation and maintenance of site-specific adaptive Best Management Practices (BMPs).

23. New surface disturbance shall not be allowed between May 15 and July 15, to prevent potential taking of migratory birds and/or eggs unless otherwise approved by the Grand Junction Field Office Manager. If vegetation removal can be planned and accomplished prior to May 15, then exception to this condition can be granted to allow work on the project during the closure period.
24. To minimize visual impacts in section 30, T8S R96W, tree removal shall be carried out so that irregular rather than straight lines edge openings in the cut vegetation on the slope. Trees may also be thinned selectively near the cleared alignment, "feathering" the edges to minimize visual contrasts.
25. Rainwater catchment pipelines on the mesa top and along the access road shall be avoided if possible, and if damaged, shall be immediately repaired, to allow for the continued use of the catchment to water livestock and wildlife.
26. In the event any fencing or cattleguards are damaged they shall immediately be replaced or repaired.

