

**U.S. Department of the Interior
Bureau of Land Management
Glenwood Springs Field Office
50629 Highway 6 & 24
PO Box 1009
Glenwood Springs, CO 81602**

ENVIRONMENTAL ASSESSMENT

NUMBER: CO_140_2005_072 EA.

CASEFILE NUMBER: COC-41048.

PROJECT NAME: Application for Permit to Drill: GGU Federal 12A-28-691, GGU Federal 12B-28-691, GGU Federal 13A-28-691, GGU Federal 14A-28-691.

LEGAL DESCRIPTION: swsw, nsw, sec 28 T6S R91W.

APPLICANT: Bill Barrett Corporation.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action: Bill Barrett Corporation proposes to drill 2 natural gas wells on the existing Gibson Gulch Unit #12-28 and 2 natural gas wells on the existing Gibson Gulch Unit #13-28. No new surface disturbance is planned at the location or on the access roads. Any additional pipelines that may be required will use the existing pipeline corridors.

Both locations are federal surface and federal minerals. See attached map.

No Action Alternative:

The proposed action involves federal subsurface minerals that are encumbered with federal oil and gas leases, which grants the lessee a right to explore and develop the lease. The no action constitutes denial of the proposed action and could be used to prevent unnecessary and undue degradation. Absent a non-discretionary statutory prohibition against drilling, BLM cannot deny the right to drill and develop the leasehold. Only Congress can completely prohibit development activities (Western Colorado Congress, 130 IBLA 244, 248 (1994), citing Union Oil Co. of California v. Morton, 512 F.2d 743, 750-51 (9th Cir. 1975). For this reason, the No Action alternative has been considered but eliminated.

NEED FOR THE ACTION:

The purpose and need is to authorize the Application for Permit to Drill (APD) to satisfy federal lease obligations that will in turn provide natural gas for commercial marketing to the public.

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: Glenwood Springs Resource Management Plan.

Date Approved: Amended in November 1991 - Oil and Gas Leasing and Development - Final Supplemental Environmental Impact Statement; amended Nov. 1996 - Colorado Standards and Guidelines; amended in August 1997 - Castle Peak Travel Management Plan; amended in March 1999 - Oil and Gas Leasing & Development Final Supplemental Environmental Impact Statement; amended in November 1999 - Red Hill Plan Amendment; and amended in September 2002 – Fire Management Plan for Wildland Fire Management and Prescriptive Vegetation Treatment Guidance.

Decision Number/Page: The proposed action is located on leases in area designated Open for oil and gas leasing in 1984 in the Glenwood Springs Resource Management Plan (page 14 and map 4).

Decision Language: The FSEIS described the environmental effects, including the cumulative effects, of oil and gas development, but did not authorize the construction of any individual well locations. This EA is more site-specific than the FSEIS and includes the results of the on-the-ground inventories for cultural resources and special status plant and animal species, if appropriate. This EA tiers to both the DSEIS and FSEIS and the information in the FSEIS is incorporated by reference. The EA will focus on specific issues and will not deal with the larger regional issues addressed in the FSEIS. The proposed action has been reviewed for and is in compliance with the FSEIS (43 CFR 1610.5, BLM 1617.3) - Page or Decision Number: Pages 1-5, Record of Decision dated March 24, 1999.

Standards for Public Land Health: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. The Glenwood Springs Field Office is in the ongoing process of completing Land Health Assessments on a landscape basis. At this time the landscape addressed in this EA has not had a formal Land Health Assessment completed. As such, no formal determination on conformance with the Standards will be made until a formal Land Health Assessment and Determination Document is completed. The tentative schedule for Land Health Assessment on this landscape is 2010. At the time this landscape is scheduled, a Land Health Assessment will be completed addressing all of the Land Health Standards. Based on the findings of the assessment, the authorized officer may take appropriate action to achieve conformance with the standards or implement further mitigating measures on future actions to maintain or prevent a further decline in land health.

The five standards cover upland soils, riparian systems, plant and animal communities, threatened and endangered species, and water quality. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands. Because a standard exists for these five categories, the impact analysis must address whether the proposed action or any alternatives being analyzed would result in impacts that would maintain, improve, or deteriorate land health conditions for that specific parameter. These analyses are located in specific elements listed below:

AFFECTED ENVIRONMENT / ENVIRONMENTAL CONSEQUENCES / MITIGATION MEASURES:

CRITICAL ELEMENTS

AIR QUALITY

Affected Environment: The proposed action area (Garfield County) has been described as an attainment area under CAAQS and NAAQS (Colorado Ambient Air Quality Standards and National Ambient Air Quality Standards). An attainment area is an area where ambient air pollution amounts are determined to be below NAAQS standards. For further details, refer to the Draft Roan Plateau RMPA EIS, page 3_20-22.

Environmental Consequences/Mitigation: The Draft Roan Plateau EIS, pages 4_31-4_48, describes potential effects from oil and gas development. Analysis was completed with regard to greenhouse gas emissions, a near-field and far-field analysis for carbon monoxide, particulate matter (PM₁₀ and PM_{2.5}), sulfur dioxide, hazardous air pollutants including: benzene, ethylbenzene, formaldehyde, hydrogen sulfide, toluene, and xylenes. Sulfur and nitrogen deposition analysis, acid neutralizing capacity, and visibility screening-level analysis were also completed in the Draft EIS. Findings indicate that no adverse long term effects would be realized under the Draft Roan Plateau EIS plan. It is anticipated that the proposed action would not likely produce adverse effects to air quality in light of the analysis from air quality modeling contained in the Roan Plateau plan.

However, truck traffic during the initial rig-up, well completion, rig-move, and production activities would likely produce high levels of dust in dry conditions without dust abatement.

Emissions of particulate matter will be reduced through control of dust during construction and completion, and production activities. The operator will water the road and/or use magnesium chloride for dust abatement or other approved surfactant by the authorized officer.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

Affected Environment: There are no Areas of Critical Environmental Concern within the proposed project area.

Environmental Consequences/Mitigation: N/A

CULTURAL RESOURCES

Affected Environment: A cultural resource inventory has been conducted for each of the well locations (GSFO# 1101-5 and 8295-2). No cultural properties were located that are eligible for listing on the National Register of Historic Places.

Environmental Consequences/Mitigation: No historic properties were identified during the surveys. In accordance with Colorado BLM/SHPO Protocol (1998) and National Protocol (1997) a determination of “No Effect” was made for this action and formal consultation with the Colorado State Historic Preservation Office (SHPO) is not required to comply with Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) as amended.

Indirect long term cumulative impacts from increased access could result in a range of impacts to known and undiscovered cultural resources in the vicinity of the location, from illegal collection and excavation to vandalism.

The importance of the Education/Discovery Stipulation needs to be stressed to Bill Barrett Corporation and all of their subcontractors informing them of their responsibilities to protect and report any cultural resources encountered on public land during operations under this permit.

Mitigation: A standard Education/Discovery Condition of Approval for Cultural Resource protection will be attached to the APDs.

ENVIRONMENTAL JUSTICE

Affected Environment: Review of 2001 data from US Census Bureau indicates the median annual income of Garfield County averages \$43,560 and is neither an impoverished or wealthy county. Median annual income of Eagle County averages \$51,578 and is not impoverished but is considered a wealthy county. U.S. Census Bureau data from July, 2002 shows the minority population of Garfield and Eagle County comprises less than 3 % of the total population¹.

Garfield County		Eagle County	
Median Household Income		Median Household Income	
Estimate	90% Confidence Interval	Estimate	90% Confidence Interval
\$43,560	\$40,491 to \$46,613	\$51,578	\$47,958 to \$55,177

Environmental Consequences/Mitigation: The proposed action and alternatives are not expected to create a disproportionately high and adverse human health impact or environmental effect on minority or low-income populations within the area.

FARMLANDS, PRIME AND UNIQUE

Affected Environment: The proposed action does not involve any prime or unique farmlands.

FLOODPLAINS

Affected Environment: The proposed action would not take place in a floodplain.

INVASIVE, NON-NATIVE SPECIES

¹ Table CO-EST2002-ASRO-02-08-County Population Estimates by Race Alone and Hispanic or Latino Origin: July 1, 2002
 Source: Population Division, U.S. Census Bureau
 Release Date: September 18, 2003
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Affected Environment: Noxious weeds had been reported in the project area previously, but the operator was instructed to take actions to control the weeds. Cheatgrass is also present in the vicinity.

Environmental Consequences/Mitigation: The risk of cheatgrass or other noxious weeds becoming dominant on the well sites or access roads following disturbance is high, since cheatgrass is already present in the vicinity and a small infestation of other noxious weeds may also remain. The Sundry Notice and Conditions of Approval include measures to re-vegetate the road construction area with native perennial grasses and shrubs and native or desirable, nonnative forbs. The project proponent will adhere to the specified seed mix and will continue with reclamation activities, including reseeding if necessary, until BLM's interim reclamation objectives are achieved. In addition, a standard Condition of Approval is attached requiring the project proponent to promptly treat and control any invading noxious weeds. A Pesticide Use Proposal must be approved by BLM prior to commencing any herbicide spraying.

MIGRATORY BIRDS

Affected Environment: The existing well pads are located in sagebrush and pinyon-juniper woodland vegetation. Given these habitat types, the area provides habitat for a variety of migratory bird species. Two species characteristic of pinyon/juniper woodlands, the pinyon jay and black-throated gray warbler, are listed on the USFWS's Bird of Conservation Concern List and may be present in the project area. Additional pinon/juniper birds that may nest in the vicinity include the black-chinned hummingbird, gray flycatcher and juniper titmouse. Within the sagebrush vegetation, the sage sparrow, and Brewer's sparrow may occur. The pinyon jay and black-throated gray warbler are both tree nesters. The sage sparrow is a ground nester that nests at the base of sagebrush plants or on open ground within sagebrush stands. The Brewer's sparrow nests in sagebrush/mixed shrubland habitats in tall dense sagebrush. No raptors are known to nest in the project vicinity. However, red-tailed hawks nest nearby. These and other raptor species likely forage in the area.

Environmental Consequences/Mitigation: The proposed action will result in no new surface disturbance as wells will be drilled from existing pads using existing road access. It is likely that during pad re-construction, drilling and/or completion activities individual birds will be displaced to adjacent habitats due to noise and human presence. Raptors should be minimally affected as upland foraging habitat is plentiful in the area.

NATIVE AMERICAN RELIGIOUS CONCERNS

Affected Environment: At present, no Native American concerns are known by the GSFO within the project area and none were identified during the inventories. The Ute tribe has in the past, and continues to claim the area as their ancestral homeland. If new data is disclosed, new terms and conditions may have to be negotiated to accommodate their concerns.

Environmental Consequences/Mitigation: Indirect impacts from increased access and personnel could result in a range of impacts to unknown cultural resources from illegal collection to vandalism. The importance of the Education/Discovery Stipulation needs to be stressed to Tom

Brown and their subcontractors. A standard Education/Discovery Condition of Approval for Cultural Resource protection will be attached to the APD.

THREATENED, ENDANGERED, AND SENSITIVE SPECIES (includes an analysis on Standard 4)

Affected Environment: According to the latest species list from the U. S. Fish and Wildlife Service, the following federally listed and candidate species may reside or be impacted by actions occurring in Garfield County: bald eagle, Canada lynx, Mexican spotted owl, black-footed ferret, Uinta Basin hookless cactus, Parachute beardtongue, DeBeque phacelia, boreal toad, yellow-billed cuckoo, razorback sucker, Colorado pikeminnow, bonytail chub, and humpback chub.

Specific to the project location, no federal or state listed species or federal proposed or candidate species, or their habitat occur within the project area. The project area also does not contain potential habitat for any BLM Sensitive Species.

Environmental Consequences/Mitigation: Based on the lack of potential habitat and occurrence records for any federally listed or BLM Sensitive species, the proposed action should have “No Effect” on any listed species, and no impacts to BLM Sensitive species or their habitats. In addition, no indirect or offsite impacts are anticipated.

Analysis on the Public Land Health Standard for Threatened & Endangered species: The project area is not scheduled for a formal land health assessment until 2010. However, due to the lack of potential or occupied habitat for any special status species, the proposed action should have no impact on the ability of the area to meet Standard 4 for special status species.

WASTES, HAZARDOUS OR SOLID: All wastes will be managed in accordance with the applicable Oil and Gas regulations and On-Shore Orders.

WATER QUALITY, SURFACE AND GROUND (includes an analysis on Standard 5)

Affected Environment: Pad 12B would lie south of the ephemeral or intermittent Jackson Creek drainage, and Pad 13A would lie north of an ephemeral or intermittent branch of the perennial Divide Creek. Each of these drainages drains into the Lower Divide Creek drainage in the Divide Creek Watershed. The Divide Creek watershed further drains into the Colorado River. This section of the Colorado river including tributaries and drainages is classified as aquatic life cold class 1, recreation class 1a, water supply and agriculture.

The state of Colorado has developed the 303(d) list which identifies impaired water bodies, waters not meeting water quality standards with technology based controls alone. No streams within the proposed action watershed area are known to be listed on the 303(d) list; suggesting water quality standards are currently being met.

Pad construction and pipeline installation would result in the removal of vegetation and disturbance of soils that would increase sediment and salinity in surface water in the area. There is some risk that the impact to surface waters would be greater than anticipated should a high

intensity thunder storm hit immediately following the surface disturbing activity and before mitigating measures are in place. With measures to control runoff water in place, establishment of vegetation, and proper engineering of roads, the increase in the amount of sediment in surface waters would be minimized. Culverts in road crossings of drainages would be required to pass a 25 year 6 hour storm event and would be installed during no flow or low flow conditions. Water produced during drilling activity would be contained in an engineered pit on the pad site and hauled to a disposal facility.

Negative impacts to surface waters would usually be expected to be minor and last for the most part for 3 years following the initial disturbance. Mitigating activities should be initiated prior to and during pad construction to avoid unnecessary degradation of surface water quality. There would be some minor long term negative impacts to surface water quality from an increase in sediment coming from working surfaces that would not be rehabilitated until the wells are no longer producing and facilities are removed and the area rehabilitated.

Analysis on the Public Land Health Standard for water quality: A formal land health assessment was completed in the project area in 2004, although the findings of the assessment have yet to be formalized. There is, however, no indication that water quality was a concern in the proposed action area. Consequently, with required mitigation, the proposed action would not likely prevent Standard 5 from being met.

Ground Water (affected environment/consequences): There are scattered water wells in the area to the northwest and northeast, the nearest about ½ mile to the northwest (depth 128'). The aquifer is either the Wasatch or unconsolidated surficial deposits overlying the Wasatch. Usable ground water in the Wasatch would occur in lenticular sands. Sandstones in the Williams Fork are too deep to contain usable ground water. No "regional" continuous bedrock aquifer is known to be present. Surface casing will be set to 750' in the wells. The cemented surface casing would provide adequate protection for any water zones which are currently being utilized in the area. In addition, the operator is required to identify and protect any usable water zones encountered below the surface casing.

WETLANDS & RIPARIAN ZONES (includes a analysis on Standard 2)

Affected Environment: The Proposed Action and No Action are not located within wetlands or riparian zones.

Environmental Consequences/Mitigation: There would be no impact to wetlands or riparian zones from either the Proposed Action or the No Action alternative.

Analysis on the Public Land Health Standard for riparian systems: There would be no affect on the Public Land Health Standard for riparian systems.

WILD AND SCENIC RIVERS

Affected Environment: There are no un-studied rivers, rivers found to eligible or designated Wild and Scenic Rivers within the proposed project area.

Environmental Consequences/Mitigation: N/A

WILDERNESS

Affected Environment: There are no designated Wilderness areas, Wilderness Study Areas or citizen's wilderness proposal areas within the proposed project area.

NON-CRITICAL ELEMENTS

The following elements **must** be addressed due to the involvement of Standards for Public Land Health:

SOILS (includes a analysis on Standard 1)

Affected Environment: The proposed action area covers two soil map units that are summarized by proposed pad site. The descriptions below are summarized from the Soil Survey of Rifle Area, Colorado (SCS 1977).

Pad 12B: Morval-Tridell complex (6 to 25% slopes) is a moderately sloping to hilly soil complex found on alluvial fans and on the sides of mesas. The Morval and Tridel soils are described as having medium surface runoff characteristics with a moderate erosion hazard. Both soils are described as deep and well drained. Grazing is the primary use for these soils.

Pad 13A: Olney loam (6 to 12% slopes) is a deep well drained moderately sloping to rolling soil found on alluvial fans and valley sides. The surface runoff characteristics and erosion hazard are both described as moderate. This soil map unit is primarily used for irrigated pasture and wildlife habitat for a variety of species.

There would be some loss of soil, some loss of soil productivity, and an increase in sedimentation resulting from reconstruction of the well pad and installation of the buried pipeline. In conjunction with mitigation, the proposed action includes measures to prevent direct placement of fill material in drainages, limits reclaimed slopes to 3:1, and to re-vegetate disturbed areas. Reclamation measures such as contouring disturbed areas, roughing the soil surface, re-vegetating, and controlling runoff would help to limit soil erosion. The loss of soil and sedimentation would occur after the construction phase for a short term of from 1 to 3 years until re-vegetation occurs.

Analysis on the Public Land Health Standard for upland soils: The proposed action, with required mitigation, would not likely prevent health standards for soils from being met.

VEGETATION (includes an analysis on Standard 3)

Affected Environment: The proposed action is to drill additional wells on existing well pads. Currently, these pads are partially reclaimed with herbaceous vegetation.

Environmental Consequences: The proposed action would involve redistributing existing pads in order to drill additional wells on the pads. The proposed action would involve no additional disturbance beyond the area of previous disturbance. The action would result in the short-term loss of vegetation on the temporary disturbed areas. With implementation of reclamation practices identified in the COAs, establishment of desirable herbaceous vegetation on the sites can be expected within 1-3 years following completion of drilling. Monitoring of the reclamation would occur as identified in COAs. There would be a long-term loss of vegetation on those portions of the pad and roads needed for ongoing production activities.

Mitigation: The pads would be fenced to exclude livestock grazing for the first two growing seasons or until the seeded species become firmly established. The seeded species will be considered firmly established when 50% of the seeded species are producing seed.

Analysis on the Public Land Health Standard for plant and animal communities (partial, see also Wildlife, Aquatic and Wildlife, Terrestrial): The surface disturbance associated with the proposed action has the potential to encourage expansion and dominance of the site by cheatgrass. The Invasive, Non-native Species section includes provisions to revegetate the disturbances with native vegetation and to control noxious weeds. With timely and appropriate reclamation, including fencing of the pads to exclude livestock grazing, the proposed action should cause no further decline in the ability of the landscape to achieve Standard 3 for healthy plant communities.

WILDLIFE, AQUATIC (includes an analysis on Standard 3)

Affected Environment: The existing 12B-2B-691 well pad is located at Jackson Gulch, a tributary to Divide Creek. Jackson Gulch is an ephemeral drainage that only runs water during spring snowmelt and during spring and summer thunderstorm events. No perennial water sources capable of supporting aquatic wildlife area found in the project area.

Environmental Consequences/Mitigation: The proposed will re-disturb an existing well pad to accommodate direction well bores. No surface erosion is anticipated as the site already exists. It is possible that until surface reclamation takes hold some minor erosion could occur into Jackson Gulch. However, sediment loads should be well within background levels. No impacts to aquatic wildlife are anticipated.

Analysis on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Terrestrial): The proposed action would have no bearing on the watersheds ability to meet Standard 3 for aquatic wildlife.

WILDLIFE, TERRESTRIAL (includes an analysis on Standard 3)

Affected Environment: The existing well pads are located in mapped big game winter range that has been identified as High Value habitat. The Big Game Winter Habitat Timing Limitation (TL-1) is mapped for the area. However, the federal leases contain no winter timing limitations for big game. In addition to big game, a variety of small game and non-game wildlife, and birds are found in the vicinity of these proposed wells. General impacts (short term, long term, and cumulative) to terrestrial wildlife were adequately addressed in the 1999 FSEIS. At this time a

site-specific habitat assessment has not been conducted to determine the quality of the habitat. However, based on existing data and maps, the diversity of habitats, and the relatively undisturbed nature of the area, the habitat is considered to be high quality.

Environmental Consequences/Mitigation: Because the federal lease contains no big game winter timing limitation, a 60-day Condition of Approval (COA) will be invoked in order to provide some protection to wintering big game in the area. Compliance with this timing limitation will minimize impacts to wintering big game by limiting construction during a 60-day period of the critical winter months – mid-January through mid-March.

Standard measures are incorporated into the APD along with other measures (i.e., automatic well reporting, and reclamation) to conform to the FSEIS that will help to mitigate wildlife impacts. Public access and use of the roads for all the proposed well sites will be prevented due to controlled access on private lands. This will minimize disturbance and reduce effective habitat loss.

Mitigation: No drilling or completion work including pad construction, all surface completion, and pipeline construction etc., will be allowed from January 15 to March 15, in order to protect wintering big game.

Analysis on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Aquatic): The wells pads already exist and will be re-disturbed to accommodate new wells. The action will have minimal additional impacts to wildlife with regard to Standard 3 for terrestrial species.

THRESHOLD ANALYSIS FOR WILDLIFE AND WILDLIFE HABITAT MITIGATION:

In the FSEIS Record of Decision (March 1999) on page 14 it states that: “*Within high value or crucial big game winter range, the operator is required to implement specific measures to reduce impacts of oil and gas operations on wildlife and wildlife habitat.. Measures to reduce impacts would generally be considered when well density exceeds four wells per 640 acres, or when road density exceeds three miles of road per 640 acres.*” Furthermore, Lease Notice GS-LN-05 states: “*Within high value or crucial big game winter range, the operator is required to implement specific measures to reduce impacts of oil and gas operations on wildlife and wildlife habitat.*”

The road and well density thresholds will not be exceeded via implementation of the proposed action. As such offsite or replacement mitigation measures to reduce impacts to wildlife are not currently being considered. However, as future activity increases in the area, and a Geographical Area Plan (GAP) is initiated, it is possible that mitigation will be sought to offset habitat loss and fragmentation. Cumulative impacts will be addressed in greater detail in the GAP document and mitigation opportunities will be identified and pursued.

OTHER NON-CRITICAL ELEMENTS: For the following elements, those brought forward for analysis will be formatted as shown above.

ACCESS AND TRANSPORTATION

Environmental Consequences/Mitigation: Existing road access to the pad is through privately owned lands with no legal public access. Truck traffic will be the heaviest during rig-up, completion activities, and the rig-move to the next location. The proposed drilling and completion activities on the federal well will likely commence in summer 2005.

NOISE:

Environmental Consequences/Mitigation: There will be increased levels of noise during the construction, drilling, and completion phases of the proposed action. The noise will be most noticeable along the roads used to haul equipment and at the well site. Drilling activities are subject to noise abatement procedures as defined in the Colorado Oil and Gas Conservation Commission Rules and Regulations (Aesthetic & Noise Control Regulations).

PALEONTOLOGY:

Affected Environment: These proposed well falls within a Condition I area for possible sites of paleontological or scientific value. However, dense soil and vegetation cover rock outcrops and as a result a paleontological survey would not be required for those specific potentially fossiliferous areas prior to BLM project authorization. If scientifically important fossils are discovered during construction activities and cannot be avoided, mitigation may be necessary.

All persons associated with operations under this authorization should be informed that any objects or sites of paleontological value, such as vertebrate or scientifically important invertebrate fossils, should not be destroyed, damaged or removed.

Environmental Consequences/Mitigation: A standard Education/Discovery Condition of Approval for Paleontology Resource protection will be attached to the APDs.

VISUAL RESOURCES:

Affected Environment: The proposed project area is located in an area classified as VRM Class III in the GSRA 1984 Resource Management Plan. The objective of VRM Class III is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

The protection of VRM classes, landscape character and scenic quality on private and public lands and split estate is discussed on pages 3-41 through 3-45 of the FSEIS. The impacts of development are discussed on pages 4-49 through 4-54 of the FSEIS. The proposed action will not affect any of the key viewing areas or viewsheds described in the FSEIS. In particular, the proposed action will not be seen from the key viewing areas of the 1-70 corridor, county roads, or the town of Rifle, New Castle, or Silt.

Environmental Consequences/Mitigation: The proposed action will create short term impacts within the landscape the will dominate the area during drilling and completion stages. The addition of new facilities on the two existing pads will add new long term contrasts into the landscape in form, line and texture. However, with no new surface disturbance and attached mitigation such as reclamation and

painting the facilities to blend in with the surrounding environment (determined during on-site reviews); the proposed action will not dominate the viewshed in the long term and will meet VRM Class III objectives.

Non-Critical Element	NA or Not Present	Applicable or Present, No Impact	Applicable & Present and Brought Forward for Analysis
Travel/Access		X	
Cadastral Survey	X		
Fire/Fuels Management	X		
Forest Management	X		
Geology and Minerals			X
Hydrology/Water Rights	X		
Law Enforcement	X		
Paleontology			X
Noise			X
Range Management		X	
Realty Authorizations	X		
Recreation		X	
Socio-Economics			X
Transportation		X	
Visual Resources			X

Geology and Minerals (affected environment/consequences): Target gas zones include gas-saturated sands within the Williams Fork and Iles Formations. The production casing would be cemented from TD to above the Williams Fork in order isolate the formation from other formations and zones. Any potentially productive gas zones found in the Wasatch would also be have to be cemented off.

CUMULATIVE IMPACTS SUMMARY:

The 2004 Draft Roan Plateau Resource Management Environmental Impact Statement analyzed five alternatives for oil and gas development. The Reasonable Foreseeable Development for oil and gas development anticipated a range from 855 wells to 1582 wells on federal land across the breadth of the alternatives.

The addition of an expected 207 well in the Environmental Assessment is well below the low range of development analyzed in the Environmental Impact Statement.

PERSONS / AGENCIES CONSULTED:

Doug Weaver, Mike Brady Construction.
 Ken Kuhn, Field Superintendent, Bill Barrett Corp.
 Dennis Wiarda, Construction Foreman, Bill Barrett Corp.
 Jeff Fandrich, Landman, Bill Barrett Corp.

INTERDISCIPLINARY REVIEW:

<u>Name</u>	<u>Title</u>	<u>Area of Responsibility</u>
Bill Barter	Natural Resource Specialist	NEPA lead
Cheryl Harrison	Archaeologist	Cultural Resources, Native American Religious Concerns
Carla Scheck	Ecologist	Special Status Plants, Vegetation, Noxious Weeds
Mark Wimmer	Range Specialist	Soil/Water/Air
Kay Hopkins	Outdoor Recreation Planner	VRM, WSR, WSA, ACEC
Mike McGuire	Range Specialist	Range Management
Bruce Fowler	Geologist	Geology and Minerals

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The environmental assessment and analyzing the environmental effects of the proposed action have been reviewed. The proposed action with any approved mitigation measures result in a Finding of No Significant Impact on the human environment. Therefore, an environmental impact statement is not necessary to further analyze the environmental effects of the proposed action.

DECISION RECORD

DECISION: It is my decision to approve Applications for Permit to Drill:GGU Federal 12A-28-691, GGU Federal 12B-28-691, GGU Federal 13A-28-691, GGU Federal 14A-28-691 with the Conditions of Approval in order to provide for the orderly, economical and environmentally sound exploration and development of oil and gas resources on valid oil and gas leases.

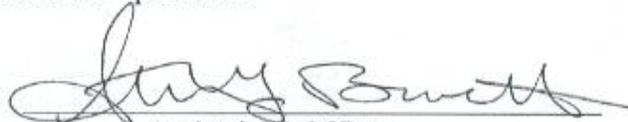
RATIONALE:

1. Approval of the proposed action is validating the rights granted with the federal oil and gas leases to develop the leasehold to provide commercial commodities of oil and gas.
2. The environmental impacts have been mitigated with measures included in the Surface Use Plan and the attached Conditions of Approval.

MITIGATION MEASURES: Mitigation measures are included in the Surface Use Plan and Conditions of Approval for both surface and drilling operations.

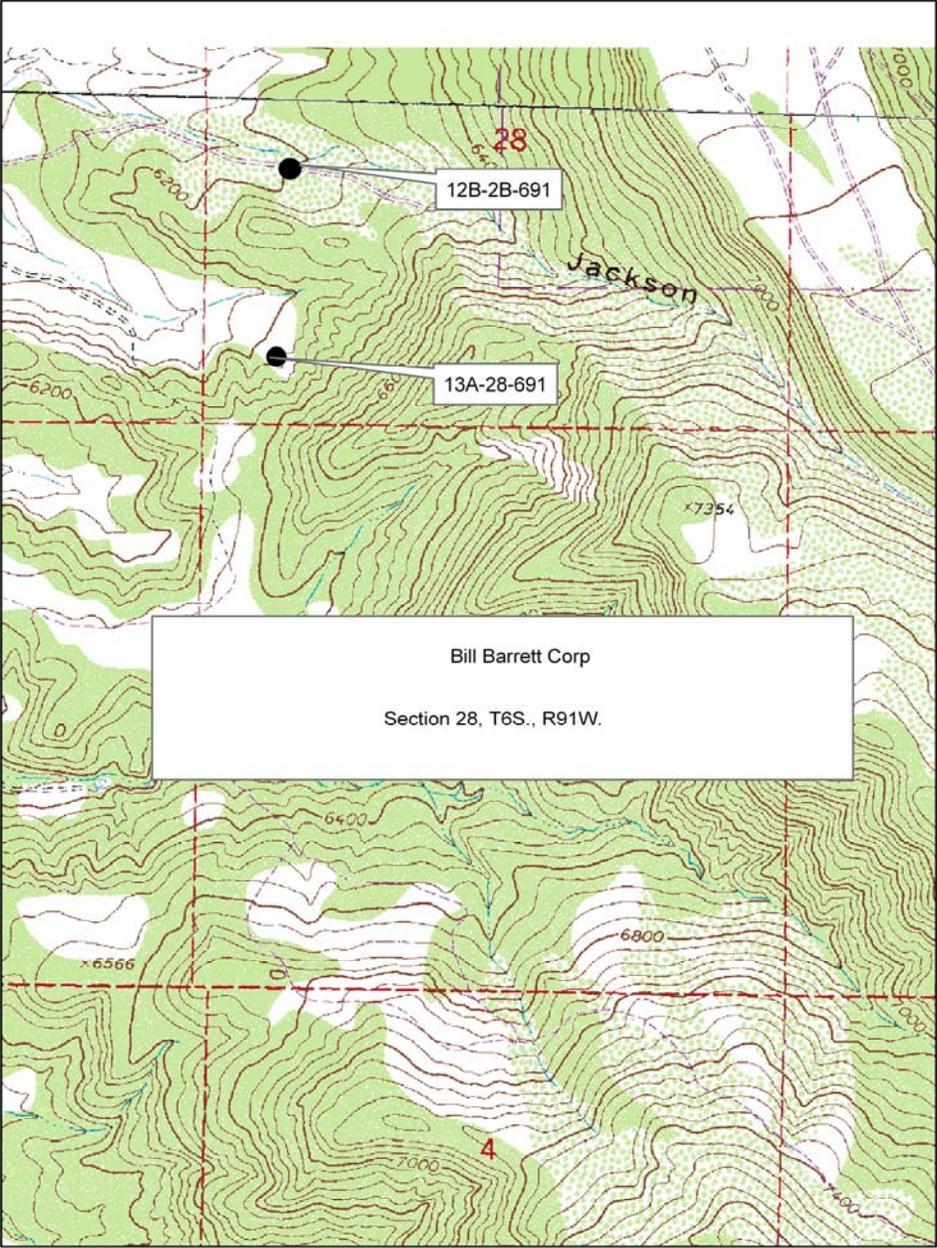
NAME OF PREPARER: Bill Barter, Natural Resource Specialist.

SIGNATURE OF AUTHORIZED OFFICIAL:


Authorized Officer

DATE SIGNED: MAY 13 2005

ATTACHMENTS: Map, Conditions of Approval.



Surface Conditions of Approval

1. No new surface disturbance beyond the original construction lines of the original drilling operation is permitted.
2. All facilities will be painted the same color as the existing production facilities. Color may be changed with the approval of the Authorized BLM Representative.
3. Fencing to control grazing livestock within the BLM range allotment will be installed around the area of pad disturbance including the perimeter of excess material. This fencing will be of standard and type to keep livestock from penetrating the fenced perimeter. Fencing will be installed after dirtwork and seed application is completed for interim reclamation and prior to livestock turnout on the allotment.
4. The operator is responsible for applying dust abatement measures as needed or directed by the Authorized Officer. The level and type of treatment (watering or application of various dust agents, surfactants and road surfacing material) may be changed in intensity and must be approved by the Authorized Officer. Dust control is needed to prevent heavy plumes of dust from road use that create safety problems and disperses heavy amounts of particulate matter on adjacent vegetation.
5. Noxious weeds, which may be introduced due to soil disturbance associated with the proposed lease operations, will be treated by methods to be approved by the Authorized Officer. A Pesticide Use Plan (PUP) is required prior to use of any pesticide.

6. Cultural Resource Education/Discovery Stipulation

All persons in the area who are associated with this project must be informed that if anyone is found disturbing historic, archaeological, or scientific resources, including collecting artifacts, the person or persons will be subject to prosecution.

Pursuant to 43CFR10.4(g), the BLM authorized officer must be notified, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43CFR10.4 (c) and (d), activities must stop in the vicinity of the discovery and the discovery must be protected for 30 days or until notified to proceed by the authorized officer.

If in connection with operations under this contract the project proponent, his contractors, subcontractors, or the employees of any of them, discovers, encounters or becomes aware of any objects or sites of cultural or paleontological value or scientific interest such as historic or prehistoric ruins, graves or grave markers, fossils, or artifacts, the proponent shall immediately suspend all operations in the vicinity of the cultural or paleontological resource and shall notify the BLM authorized officer of the findings (16 U.S.C. 470h-3, 36CFR800.112). Operations may resume at the discovery site upon receipt of written instructions and authorization by the authorized officer. Approval to proceed will be based upon evaluation of the resource. Evaluation shall be by a qualified professional selected by the authorized officer from a federal agency insofar as practicable. When not practicable, the holder shall bear the cost of the services of a non-federal professional.

Within five working days the authorized officer will inform the holder as to:

- whether the materials appear eligible for the National Register of Historic Places;

- the mitigation measures the holder will likely have to undertake before the site can be used (assuming in situ preservation is not necessary); and,
- a time frame for the authorized officer to complete an expedited review under 36 CFR 800.11, or any agreements in lieu thereof, to confirm through the State Historic Preservation Officer that the findings of the authorized officer are correct and the mitigation is appropriate.

The proponent may relocate activities to avoid the expense of mitigation and/or the delays associated with this process, as long as the new area has been appropriately cleared of resources and the exposed materials are recorded and stabilized. Otherwise, the proponent will be responsible for mitigation costs. The authorized officer will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the authorized officer that the required mitigation has been completed, the proponent will then be allowed to resume construction.

Antiquities, historic, prehistoric ruins, or objects of scientific interest that are outside of the authorization boundaries but directly associated with the impacted resource will also be included in this evaluation and/or mitigation.

Antiquities, historic, prehistoric ruins, or objects of scientific interest, identified or unidentified, that are outside of the authorization and not associated with the resource within the authorization will also be protected. Impacts that occur to such resources, which are related to the authorizations activities, will be mitigated at the proponent's cost including Native American consultation cost.

7. All persons associated with operations under this authorization must be informed that any objects or sites of paleontological or scientific value, such as vertebrate or scientifically important invertebrate fossils, shall not be damaged, destroyed, removed, moved or disturbed. If in connection with operations under this authorization any of the above resources are encountered the proponent shall immediately suspend all activities in the immediate vicinity of the discovery that might further disturb such materials and notify the BLM authorized officer of the findings. The discovery must be protected until notified to proceed by the authorized officer.

As feasible, the proponent shall suspend ground-disturbing activities at the discovery site and immediately notify the BLM authorized officer of any finds. The BLM authorized officer will, as soon as feasible, have a BLM-permitted paleontologist check out the find and record and collect it if warranted. If ground-disturbing activities cannot be immediately suspended, the proponent shall work around or set the discovery aside in a safe place to be accessed by the BLM-permitted paleontologist.

8. Reclamation Plan. Refer to Appendix I. Surface Reclamation of the 6/98 GSFO's Draft Supplemental EIS for Oil & Gas Leasing Development (pages I-1 through I-8) for specific reclamation goals, objectives, timelines, measures and monitoring methods. These guidelines will be followed in completing the reclamation of disturbed surfaces on well pads, access roads and pipelines

Some effective practices that will be implemented during reclamation include, but are not limited to: proper siting of the well pad to minimize impacts, the immediate seeding of disturbed areas after construction, proper storage and redistribution of topsoil, reshaping cut and fill slopes, seeding with specified seed mix within the first available growing season after disturbance, deep ripping (>18 inches on 2 foot centers), fencing reclaimed areas to protect from livestock use, and the use of riprap, slash or other erosion control structures to help control sediment loss.

The 4 Reclamation Categories defined on Page I-8 of Appendix I (6/98 GSFO's Draft Supplemental EIS for Oil & Gas Leasing Development) will be used in gauging the progress of reclamation monitoring.

Seed Mix Application Practices

A specified seed mix designed to meet interim reclamation standards while providing forage and browse for wintering elk and deer using a mixture of shrub, grass and forb species shall be applied. The following seed mix and rates will be used on all disturbed surfaces, including pipelines unless otherwise noted in the specific APD:

<u>Species of Seed</u>	<u>Variety</u>	<u>Application Rate (lbs/acre)</u>
4-wing Saltbush	Rincon	2.0
Wyoming big sagebrush		0.5
Western wheatgrass	Arriba	3.0
Bluebunch wheatgrass	P7	3.0
Thickspike wheatgrass	Critana	2.5
Scarlet globmallow		0.5
Rocky Mountain penstemon		0.5
Total:		12.0 lbs. PLS/acre Total

The above rate of application is listed in pounds of pure live seed (PLS)/acre. The seed will be certified and there will be no primary or secondary noxious weeds in the seed mixture. The operator shall notify the Authorized Officer 24 hours prior to seeding and shall provide seed tags and evidence of certification of the seed mix to the Authorized Officer within 30 days of completion of the seed application.

Upon completion of backfilling, leveling, ripping to minimum 18 inch depth on 2 foot centers, and recontouring, the stockpiled topsoil will be evenly spread over the reclaimed areas(s). Prior to reseeding, all disturbed surfaces will be scarified and left with a rough surface. No depressions will be left that would trap water and form ponds.

The prepared seedbed will be seeded within 24 hours after completing dirt work unless a change is requested by the operator and approved by the Authorized Officer. Prepare the seedbed by contour cultivating 4-6 inches deep. Drill seed ¼ to ½ inch deep following the contour. In areas that cannot be drilled, broadcast seed at 1½ times the application rate and cover ¼ to ½ deep with a harrow or drag bar. All seeding will be conducted after September 1 and prior to ground frost. Spring seeding will be done after the frost leaves the ground and no later than May 15th. If the seeding is unsuccessful, operator will be required to make subsequent seedings until the reclamation objectives identified in Appendix I. Surface Reclamation of the 6/98 GSFO's Draft Supplemental EIS for Oil & Gas Leasing Development are met.

The operator will submit an annual reclamation report by December 31 to the Authorized Officer. The report will document compliance with all aspects of the reclamation objectives. The report will specify if the reclamation objectives are likely to be achieved

9. No construction, drilling, or completion activities are permitted from January 15 to March 15 in order to protect wintering big game.

CONDITIONS OF APPROVAL
APPLICATION FOR PERMIT TO DRILL

Company/Operator: **Bill Barrett Corporation**

Well Name	Well No.	API No.	Bottom Hole Location	Lease
GGU Fed	12A-28-691		SWNW Sec 28 T06S, 91W	COC-41048
GGU Fed	12B-28-691		SWNW Sec 28 T06S, 91W	COC-41048
GGU Fed	13A-28-691		NWSW Sec 28 T06S, 91W	COC-41048
GGU Fed	14A-28-691		SWSW Sec 28 T06S, 91W	COC-41048

NOTIFICATION REQUIREMENTS

- Location Construction - at least forty-eight (48) hours prior to construction of location and access roads.
- Spud Notice - at least twenty-four (24) hours prior to spudding the well.
- Casing String and Cementing - at least twenty-four (24) hours prior to running casing and cementing all casing strings.
- BOP and Related Equipment Tests - at least twenty-four (24) hours prior to initiating pressure tests.
- First Production-Notice - within five (5) business days after new well begins, or production resumes after well has been off production for more than ninety (90) days.
- Reclamation - At least (24) hours prior to re-shaping the well pad.

For more specific details on notification requirements, please check the Conditions of Approval for Notice to Drill and Surface Use Program.

APD approval is valid for a period of one (1) year from the signature date. An extension period may be granted, if requested, prior to the expiration of the original approval period.

Please contact Marty O’Mara (970) 947-2825 of the Glenwood Springs field office at least 24 hours prior to spud.

Please contact Carol Snyder (970) 244-3033, or Ed Fancher (970) 244-3039 of the Grand Junction field office at least 24 hours prior to running the surface and production casing and conducting the BOP test.

DOWNHOLE CONDITIONS OF APPROVAL FOR NOTICE TO DRILL

- 1. The TOC for the production casing needs to be a minimum of 200’ above the Williams Fork Formation either during the primary cement job or through remedial cementing. The TOC for each well must be a minimum depth of:

<u>Well No.</u>	<u>Minimum TOC</u>	
	<u>MD</u>	<u>TVD</u>
12A-28-691	3415’	3380’
12B-28-691	3448’	3387’
13A-28-691	3381’	3351’
14A-28-691	3418’	3331’

- 2. A cement bond log (CBL) will be run from the production casing shoe to **TOC** and shall be utilized to determine the bond quality for the production casing.
- 3. Any usable water zones encountered below the surface casing shall be isolated and or protected by cementing across the zone. The minimum requirement is to cement from 50 feet above to 50 feet below each usable water zone encountered. Contact BLM upon encountering any usable water zones.
- 4. In addition to the Onshore Order No. 2 BOP testing requirements, for safety concerns, please test BOP to 250 psi for 5 minutes.
- 5. Contact BLM Glenwood Springs office prior to the using of any diesel drilling additive.

REGULATORY REMINDERS

Approval of this application does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

All drilling operations, unless otherwise specifically approved in the APD, must be conducted in accordance with Onshore Oil and Gas Order No. 2.

All lease and/or unit operations will be conducted in such a manner that full compliance is made with applicable laws, regulations (43 CFR 3100), Onshore Oil and Gas Orders, and the approved plan of operations. The operator is fully responsible for the actions of his subcontractors.

A copy of the approved application for permit to drill (APD), including the conditions of approval and accompanying surface use plan will be furnished to the field representative by the operator to insure compliance and will be available to authorized personnel at the drillsite whenever active construction or drilling operations are underway.

Be aware fire restrictions may be in effect when location is being constructed and/or when well is being drilled. Contact the appropriate Surface Management Agency for information.

Section 102(b)(3) of the Federal Oil and Gas Royalty Management Act of 1982, as implemented by the applicable provisions of the operating regulations at Title 43 CFR 3162.4-1(c), requires that "not later than the 5th business day after any well begins production on which royalty is due anywhere on a lease site or allocated to a lease site, or resumes production in the case of a well which has been off production for more than 90 days, the operator shall notify the authorized officer by letter or sundry notice, Form 3160-5, or orally to be followed by a letter or sundry notice, of the date on which such production has begun or resumed."

If you fail to comply with this requirement in the manner and time allowed, you shall be liable for a civil penalty of up to \$10,000 per violation for each day such violation continues, not to exceed a maximum of 20 days. See Section 109(c)(3) of the Federal Oil and Gas Royalty Management Act of 1982 and the implementing regulations at Title 43 CFR 3162.4-1(b)(5)(ii).

In the event after-hours approval or notification is necessary, please contact one of the following individuals:

Marty O'Mara Petroleum Engineer	C: 970.319.5837 BLM Fax: 970.947.2829	W: 970.947.2825
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Carol Snyder Petroleum Engineering Tech.	H: 970.255.9339 C: 970.216.6146	W: 970.244.3033
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Ed Fancher Petroleum Engineering Tech.	H: 970.201.6792 C: 970.201.6792	W: 970.244.3039
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Bill Barter Natural Resource Specialist	W: 970.947.2838	
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BLM Fax: 970.244.3083

EPA'S LIST OF NONEXEMPT EXPLORATION AND PRODUCTION WASTES

While the following wastes are nonexempt, they are not necessarily hazardous.

- Unused fracturing fluids or acids
- Gas plant cooling tower cleaning wastes
- Painting wastes
- Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids
- Vacuum truck and drum rinsate from trucks and drums, transporting or containing nonexempt waste
- Refinery wastes
- Liquid and solid wastes generated by crude oil and tank bottom reclaimers
- Used equipment lubrication oils
- Waste compressor oil, filters, and blowdown
- Used hydraulic fluids
- Waste solvents
- Waste in transportation pipeline-related pits
- Caustic or acid cleaners
- Boiler cleaning wastes
- Boiler refractory bricks
- Incinerator ash
- Laboratory wastes
- Sanitary wastes
- Pesticide wastes
- Radioactive tracer wastes
- Drums, insulation and miscellaneous solids.