

U.S. Department of the Interior  
Bureau of Land Management  
Glenwood Springs Energy Office  
2425 South Grand Avenue, Suite 101  
Glenwood Springs, Colorado 81601

**Statutory Categorical Exclusion CO140-2007-122**

**Project:** Proposal to directionally drill two additional wells into Federal Lease COC62160 from existing pad RMV 169-18 near the old Anvil Points townsite. No new surface disturbance is anticipated for this project. The proposed new wells are the RWF 13-18 and 23-18.

**Location:** SENW Section 18, Township 6 South, Range 94 West, Sixth Principal Meridian.

**Proposal:** Williams Production RMT Company proposes to directionally drill two additional gas wells from the existing RMV 169-18 described above.

**Lease Stipulations and Conditions of Approval:** All stipulations attached to Federal Lease COC62160 remain in effect. Conditions of Approval (COAs) developed for the 2002 and 2005 Wheeler to Webster Geographic Area Plans (GAPs) also remain in effect unless superseded by the COAs attached to this Statutory Categorical Exclusion (SCE) document. The attached COAs shall be applied to the individual Applications for Permit to Drill (APDs) for the two wells addressed by this SCE.

**NEPA Compliance:** The following categories of Statutory Categorical Exclusions (SCEs) pursuant to Section 390 of the Energy Policy Act of 2005 apply to this proposal:

*Category 1: Individual surface disturbances of less than five (5) acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to NEPA has been previously completed.* The two proposed wells would not result in additional surface disturbance. The existing RMV 169-18 location was analyzed in the Wheeler to Webster GAP, signed July 2002 (GAP expansion signed May 2005). Total surface disturbance on Federal Lease COC62160 is less than 150 acres.

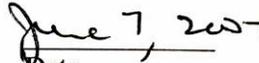
*Category 2: Drilling an oil and gas location or well pad at a site at which drilling has occurred within five (5) years prior to the date of the spudding of the well.* The existing RMV 169-18 well was spudded in 2006.

*Category 3: Drilling an oil or gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as a reasonably foreseeable activity, so long as such plan or document was approved within five (5) years prior to the date of spudding the well.* The Wheeler to Webster GAP, signed July 2002 (GAP expansion signed May 2005), anticipated future additional development.

**Prepared by:** Bridget Clayton, Natural Resource Specialist

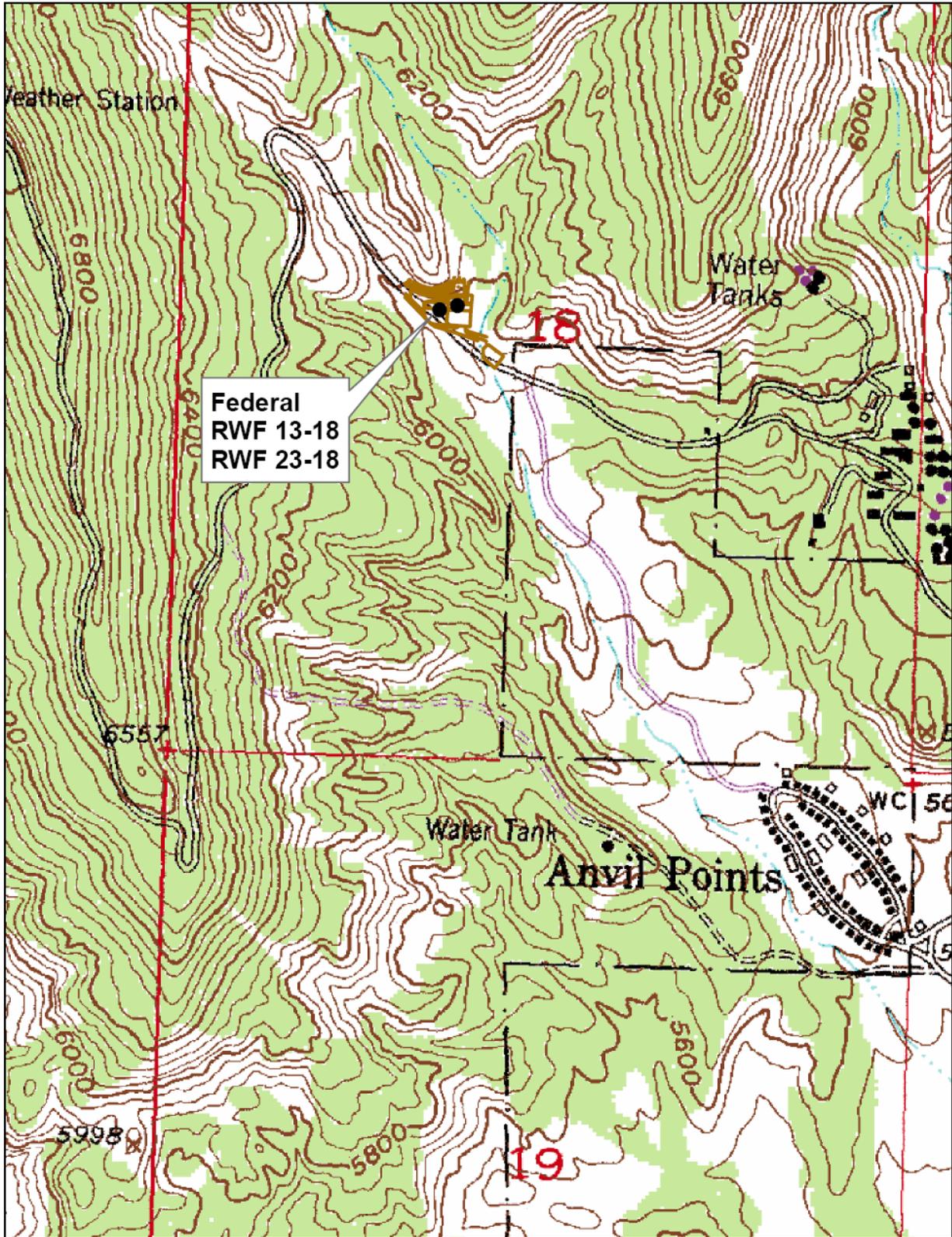
**Approval:** It is my decision to approve the proposed action with the terms and conditions referenced above:

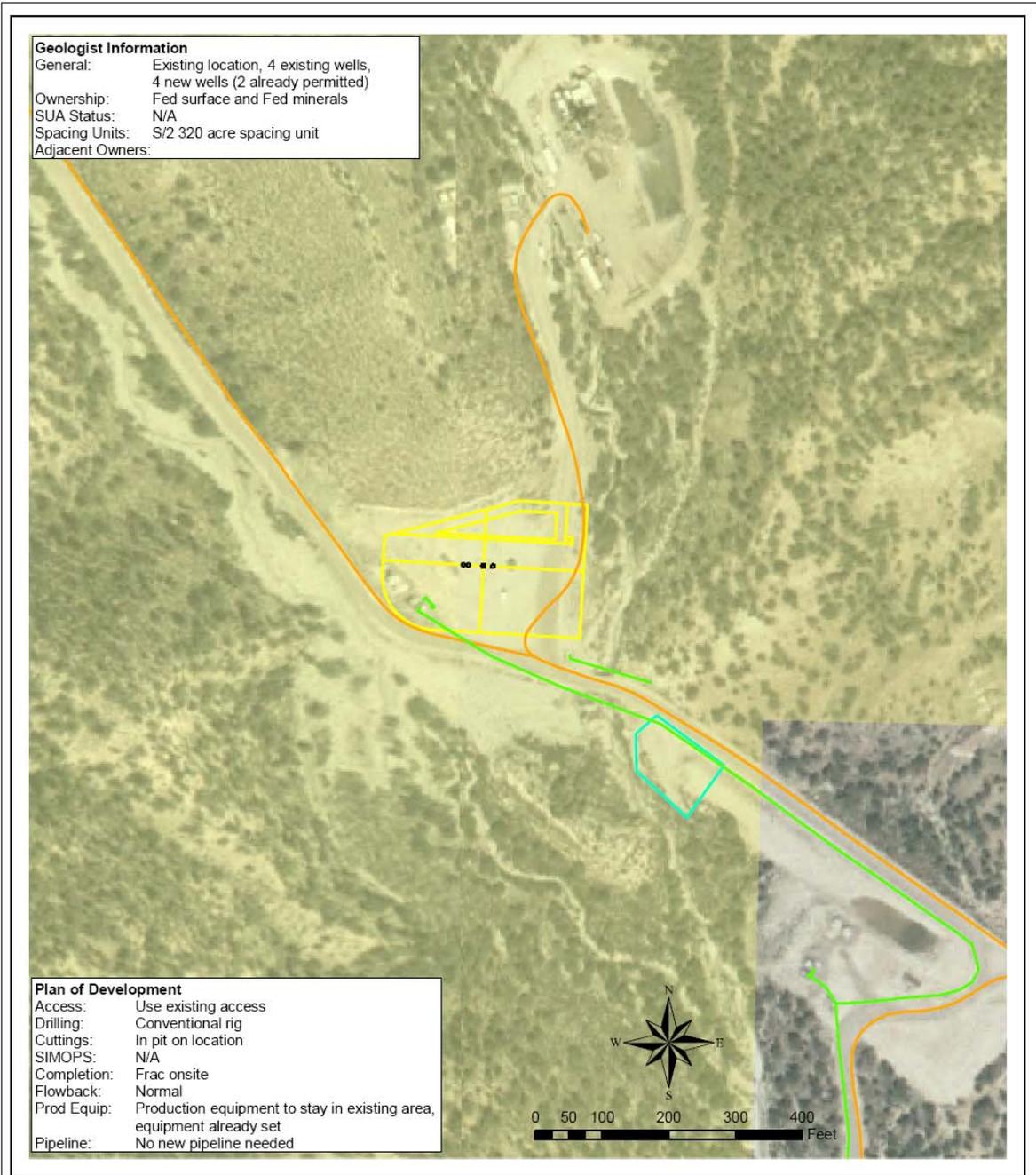
  
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Allen B. Crockett, Ph.D., J.D.  
Supervisory Natural Resource Specialist

  
\_\_\_\_\_  
Date

# Williams Production

Two new wells on existing pad RMV 169-18





**Geologist Information**  
 General: Existing location, 4 existing wells,  
 4 new wells (2 already permitted)  
 Ownership: Fed surface and Fed minerals  
 SUA Status: N/A  
 Spacing Units: S/2 320 acre spacing unit  
 Adjacent Owners:

**Plan of Development**  
 Access: Use existing access  
 Drilling: Conventional rig  
 Cuttings: In pit on location  
 SIMOPS: N/A  
 Completion: Frac onsite  
 Flowback: Normal  
 Prod Equip: Production equipment to stay in existing area,  
 equipment already set  
 Pipeline: No new pipeline needed

**Legend**

- Road
- Existing Production Equipment
- Existing Well
- Proposed Pad or Pit
- Existing Pipeline
- BLM

Williams Production RMT



RMV 169-18 Plan of Development  
 T6S R94W, Section 18

Date Prepared: March 30, 2007

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## **SURFACE USE CONDITIONS OF APPROVAL**

*The following Conditions of Approval (COAs) are in addition to resource protections provided by lease stipulations and applicable Federal laws and COAs attached to the Wheeler to Webster GAP (excepted as superseded by the following COAs).*

1. Administrative Notification: At least 48 hours prior to construction, the operator shall notify the BLM representative of construction startup plans.
2. Dust Abatement. The operator shall implement dust abatement measures as needed or directed by the BLM 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 BLM 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.
3. Deer/Elk Winter Timing Limitation. Because the area provides important habitat for mule deer and elk and in order to minimize impacts associated with winter drilling to the extent possible, a timing limitation prohibiting construction, drilling, and completion activities shall occur between January 1 and February 28.
4. Raptor Timing Limitation: Raptor Nesting. Raptor nest surveys in the project vicinity resulted in the location of one or more raptor nest structures within 0.25 mile of the well pad or 0.125 mile of an access road, pipeline, or other surface facility. To protect nesting raptors, a 60-day Timing Limitation (TL) shall be applied to prohibit initiation of construction and drilling activities within the buffer widths specified above. This TL shall apply during the period March 1 to April 30. An exception to this TL may be granted for any year in which a subsequent survey determines one of the following: (a) the nest is in a severely dilapidated condition or has been destroyed due to natural causes, (b) the nest is not occupied as of April 15, (c) the nest was occupied but subsequently failed due to natural causes, or (d) the nest was occupied but the nestlings have fledged and dispersed from the nest. The TL and exception criteria shall also apply to active alternate or replacement nests. Contact Jeff Cook, Glenwood Springs Energy Office Wildlife Biologist, at 970-947-5231 or jeffrey\_cook@blm.gov).
5. Migratory Birds. It shall be the responsibility of the operator to comply with the Migratory Bird Treaty Act with respect to “take” of migratory bird species. “Take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. The operator shall prevent use by migratory birds of reserve pits, produced water pits, and evaporation pits, that store or are expected to store fluids which may pose a risk to such birds (e.g., migratory waterfowl, shorebirds, wading birds, and raptors) during completion and after completion activities have ceased. Several established methods to prevent bird access are known to work. Methods may include but are not limited to netting, the use of bird-balls, or other alternative methods that effectively prevent bird access/use. Regardless of the method used, it should be applied within 24 hours after completion activities have begun. All mortality or injury to species protected by the Migratory Bird Treaty Act shall be reported immediately to the BLM project lead.
6. Reclamation. Reclamation goals, objectives, timelines, measures, and monitoring methods for final reclamation of oil and gas disturbances are described in Appendix I (Surface Reclamation) of the 1998 Draft Supplemental EIS (DSEIS). The specific measures described below shall be followed during interim reclamation of disturbed surfaces associated with well pads, access roads, and

pipelines. These measures, except seedbed preparation, shall also apply to temporary reclamation of topsoil storage piles and surfaces that are subject to interim reclamation but not scheduled to undergo interim reclamation for more than 1 year.

- a. Seedbed Preparation. For interim reclamation, all slopes shall be reshaped prior to seedbed preparation. Initial seedbed preparation shall consist of backfilling, leveling, and ripping all areas to be seeded to a minimum depth of 18 inches with a furrow spacing of 2 feet, followed by recontouring the surface and then spreading the stockpiled topsoil evenly. Prior to seeding, the seedbed shall be scarified and left with a rough surface. No depressions shall be left that would trap water and form ponds. Final seedbed preparation shall consist of contour cultivating to a depth of 4 to 6 inches within 24 hours prior to seeding. NOTE: Seedbed preparation is not required for topsoil storage piles or other areas of temporary reclamation.

Requests for use of soil amendments, including basic product information, shall be submitted to the BLM for approval.

- b. Seed Mixes. Selection of seed to be used in temporary or interim reclamation shall comply with the menu-based seed mixes in the letter provided to oil and gas operators dated April 16, 2007. For private surfaces, the menu-based seed mixes are recommended, but the landowner would have ultimate authority over the seed mix to be used in reclamation. The seed shall be certified free of noxious weeds. Seed may contain up to 2.0 percent of "other crop" seed by weight, including the seed of other agronomic crops and native plants; however, a lower percent of other crop seed is recommended. Seed tags or other official documentation shall be supplied to the BLM Glenwood Springs Energy Office Ecologist (Beth Brenneman, 970-947-5232 or [beth\\_brenneman@blm.gov](mailto:beth_brenneman@blm.gov)) at least 14 days before the date of proposed seeding for acceptance. Seed that does not meet the above criteria shall not be applied to public lands.
- c. Seeding Procedures. Seeding shall be conducted no more than 24 hours following completion of final seedbed preparation. A seed mix consistent with BLM standards in terms of species and seeding rate for the specific habitat type shall be used on all BLM lands affected by the project (see Attachments 1 and 2 of the letter provided to operators dated April 16, 2007).

Where practicable, seed shall be installed by drill-seeding to a depth of 0.25 to 0.5 inch. Where drill-seeding is impracticable, seed may be installed by broadcast-seeding at twice the drill-seeding rate, followed by raking or harrowing to provide 0.25 to 0.5 inch of soil cover. Hydroseeding and hydromulching may be used in temporary reclamation or in areas where drill-seeding or broadcast-seeding/raking are impracticable. Hydroseeding and hydromulching must be conducted in two separate applications to ensure adequate contact of seeds with the soil.

If interim revegetation is unsuccessful, the operator shall implement subsequent reseeding until interim reclamation standards are met. Requirements for reseeding of unsuccessful temporary reclamation will be considered on a case-by-case basis.

- d. Mulch. Mulch shall be applied within 24 hours following completion of seeding. In areas of interim reclamation that used drill-seeding or broadcast-seeding/raking, mulch shall consist of crimping certified weed-free straw or certified weed-free native grass hay into the soil. Hydromulching may be used in areas of interim reclamation where crimping is impracticable, in areas of interim reclamation that were hydroseeded, and in areas of temporary reclamation regardless of seeding method.

NOTE: As an exception to this provision, mulch is not required in areas where erosion potential mandates use of a biodegradable erosion-control blanket (straw matting).

- e. Erosion Control. Cut-and-fill slopes shall be protected against erosion with the use of water bars, lateral furrows, or other measures approved by the authorized officer. Biodegradable straw matting, bales or wattles of weed-free straw or weed-free native grass hay, or well-anchored fabric silt fence shall be used on cut-and-fill slopes and along drainages to protect against soil erosion. Additional BMPs shall be employed as necessary to reduce erosion and offsite transport of sediment.
- f. Site Protection. The pad shall be fenced to BLM standards to exclude livestock grazing for the first two growing seasons or until seeded species are firmly established, whichever comes later. The seeded species will be considered firmly established when at least 50% of the new plants are producing seed. The authorized officer will approve the type of fencing.
- g. Monitoring. The operator shall conduct annual monitoring surveys of reclaimed areas and shall submit an annual monitoring report to the authorized officer by December 31 of each year. The monitoring program shall use the four Reclamation Categories defined in Appendix I of the 1998 DSEIS to assess progress toward reclamation objectives. The annual report shall document whether attainment of reclamation objectives appears likely. If one or more objectives appear unlikely to be achieved, the report shall identify appropriate corrective actions. Upon review and approval of the report by the BLM, the operator shall be responsible for implementing the corrective actions or other measures specified by the authorized officer.

Contact Beth Brenneman, Glenwood Springs Energy Office Ecologist, at 970-947-5232 or [beth\\_brenneman@blm.gov](mailto:beth_brenneman@blm.gov).

7. Weed Control. The Operator shall regularly monitor and promptly control noxious weeds or other undesirable plant species as set forth in the Glenwood Springs Energy Office *Noxious and Invasive Weed Management Plan for Oil and Gas Operators*, dated March 2007. A Pesticide Use Proposal (PUP) must be approved by the BLM prior to the use of herbicides. Contact Beth Brenneman, Glenwood Springs Energy Office Ecologist, at 970-947-5232 or [beth\\_brenneman@blm.gov](mailto:beth_brenneman@blm.gov).
8. Cultural Education/Discovery. 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 43 CFR 10.4(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 43 CFR 10.4 (c) and (d), activities shall stop in the vicinity of the discovery, and the discovery shall be protected for 30 days or until notified by the BLM authorized officer to proceed.

If in connection with operations under this contract, the operator, its contractors or subcontractors, or the employees of any of them, discovers, encounters or becomes aware of any objects or sites of cultural value or scientific interest such as historic ruins or prehistoric ruins, graves or grave markers, fossils, or artifacts, the operator shall immediately suspend all operations in the vicinity of the cultural resource and shall notify the BLM authorized officer of the findings (16 USC 470h-3, 36 CFR 800.112). Operations may resume at the discovery site upon receipt of written instructions and authorization by the BLM authorized officer. Approval to proceed will be based upon evaluation of the resource. Evaluation shall be by a qualified professional selected by the BLM authorized officer from a Federal agency insofar as practicable. When not practicable, the operator shall bear the cost of the services of a non-Federal professional.

Within five working days, the BLM authorized officer will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places
- what mitigation measures the holder will likely have to undertake before the site can be used (assuming that *in-situ* preservation is not necessary)
- the timeframe for the BLM authorized officer to complete an expedited review under 36 CFR 800.11, or any agreements in lieu thereof, to confirm through the SHPO State Historic Preservation Officer that the findings of the BLM authorized officer are correct and that mitigation is appropriate

The operator may relocate activities to avoid the expense of mitigation and 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 operator shall be responsible for mitigation costs. The BLM authorized officer will provide technical and procedural guidelines for relocation and/or to conduct mitigation. Upon verification from the BLM authorized officer that the required mitigation has been completed, the operator will be allowed to resume construction.

Antiquities, historic ruins, prehistoric ruins, and other cultural or paleontological objects of scientific interest that are outside the authorization boundaries but potentially affected, either directly or indirectly, by the proposed action shall also be included in this evaluation or mitigation. Impacts that occur to such resources as a result of the authorized activities shall be mitigated at the operator's cost, including the cost of consultation with Native American groups.

Any person who, without a permit, injures, destroys, excavates, appropriates or removes any historic or prehistoric ruin, artifact, object of antiquity, Native American remains, Native American cultural item, or archaeological resources on public lands is subject to arrest and penalty of law (16 USC 433, 16 USC 470, 18 USC 641, 18 USC 1170, and 18 USC 1361).

**DOWNHOLE CONDITIONS OF APPROVAL**  
**APPLICATION FOR PERMIT TO DRILL**

**Company/Operator:** Williams Production RMT Company

**Surface Location:** SENW Section 18, Township 6 South, Range 94 West, 6<sup>th</sup> P.M.

<u>Well Name</u>	<u>Well No.</u>	<u>Bottomhole Location</u>	<u>Lease</u>
Federal RWF	13-18	NWSW Sec. 18, T. 6S., R. 94W.	COC62160
Federal RWF	23-18	NESW Sec. 18, T. 6S., R. 94W.	COC62160

The downhole COAs identified in the Williams Production RMT Company Master APD (Approved April 27, 2006) for the Rulison Field Area D shall apply.

Please contact Steve Ficklin (970-947-5213) or Jennifer Gallegos (970-947-5220) of the Glenwood Springs Energy office at least 24 hours:

- 1) pre- and post-spud
- 2) prior to running the surface and production casing
- 3) conducting the BOP test