

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

## Statutory Categorical Exclusion, CO140-2008-102

**Project:** Proposal to Change Access Road and Pipeline Serving the ON1 Pad in Northwest Orchard Area Southeast of DeBeque.

**Location:** Township 8S, Range 97 West, Section 1, SE $\frac{1}{4}$ SW $\frac{1}{4}$ , and Section 12, E $\frac{1}{2}$ NW $\frac{1}{4}$ , 6<sup>th</sup> PM

**Proposal:** The BLM Energy Office Ecologist requested a road and pipeline reroute to the ON1 pad because the alignment previously approved in the Northwest Orchard EA (CO-140-2007-141) was directly adjacent to habitat and individuals of the Federally threatened Uinta Basin hookless cactus (*Sclerocactus glaucus*). EnCana Oil & Gas (USA) Inc. (EnCana) proposes to improve the existing 2-track route located west and south of the proposed ON1 pad into a serviceable field development road. Using the existing route would mitigate potential impacts to the Uinta Basin hookless cactus because no individuals or their habitat were found during plant surveys conducted along the proposed 2-track route.

The lines serving the ON1 pad (maximum 8-inch diameter steel line and 4-inch water line) would be buried directly within or alongside the improved road corridor, not to exceed 35 feet in width. The ON1 pad would not be changed from the design analyzed in the Northwest Orchard EA other than changes related to road and pipeline entry onto the pad.

The other resource consideration for using the existing 2-track route as the ON1 access road involves visual resources since the road and pipeline would lie within a VRM Class II area and be visible for a period of 35 seconds from east-bound Interstate 70 traffic (based on a speed of 75 mph). Field review with OTAK's landscape architect, Lindsey Utter, found the route could meet Class II objectives provided Conditions of Approval (COAs) identified in this document were implemented in timely fashion. Briefly, these items included limiting the construction of road and pipeline to maximum 35-foot-wide disturbance corridor, using a maximum road width of 16 feet for a one-lane road, berming the road's edge, avoiding any elevated road platform, and applying magnesium chloride for dust abatement.

In comparing this proposed road change with EA CO-140-2007-141 (see Figure 1), the road length would increase from 2,090 feet (EA) to 2,985 feet, but the overall disturbance corridor for the road and pipeline would be reduced in width from 75 feet to 35 feet. This represents a reduction in disturbance area from 3.6 acres (EA) to 2.4 acres. The projected road and pipeline right-of-way lengths related to "off lease" operations (developments outside Section 1) would increase slightly from 1,900 feet (EA) to 2,100 feet.

Resource surveys were previously completed for the existing 2-track route, and additional surveys are not necessary. Two Uinta Basin hookless cactus individuals were located in close proximity to the proposed ON1 pad and will be protected by the COAs found in EA CO-140-2007-141.

**Lease Stipulations:** Stipulations attached to Federal Lease COC64195, which underlies the road and pipeline alignment, are listed in Table 1 on the following page:

**Table 1. Lease Stipulations attached to Federal Lease COC64195**

<b>COC64195 (2000) ON1 Pad</b>	All Lands within Lease	<p><b>NSO:</b> To protect threatened or endangered species habitat. Exception Criteria: surface occupancy may be authorized pending Section 7 consultation with USFWS or CDOW (if State-listed). The authorized officer will consider the type and amount of surface disturbance, plant frequency and density, relative abundance of habitat, species and location, topography, and other related factors.</p> <p><b>CSU:</b> To protect scenic values of Class II visual resource management, special design requirements, relocation of operations by more than 200 meters, and other measures to retain overall landscape character will be required.</p>
	T8S R97W Sec. 1: N2, SE	<p><b>NSO:</b> No surface use is allowed on steep slopes greater than 50% to maintain site stability and site productivity. This NSO does not apply to pipelines. Exception may be granted if lessee demonstrates that operations can be conducted without causing unacceptable impacts and that less restrictive measures will protect the public interest.</p>
	T8S R97W Sec. 1: N2, S2SW, NWSW	<p><b>CSU:</b> To protect erosive soils and slopes greater than 30%, special design, construction, and implementation measures will be required to limit the amount of surface disturbance, to reduce erosion potential, to maintain site stability and productivity, and to ensure successful reclamation.</p>
	T8S R97W Sec. 1: S2S2, NESE	<p><b>TL:</b> Big Game Winter Habitat (12/1 - 4/30). Exception may be granted under mild winter conditions for the last 60 days after consultation with CDOW.</p>

**BLM Conditions of Approval:** Conditions and stipulations that would be included in the Applications for Permit to Drill (APDSs) are attached.

**NEPA Compliance:** The following category of Categorical Exclusions pursuant to Section 390 of the Energy Policy Act (Act of 2005) applies 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 expected surface disturbance for the change in road and pipeline serving the ON1 pad would be 2.4 acres which is a 1.2 acre reduction from original EA disturbance of 3.6 acres.

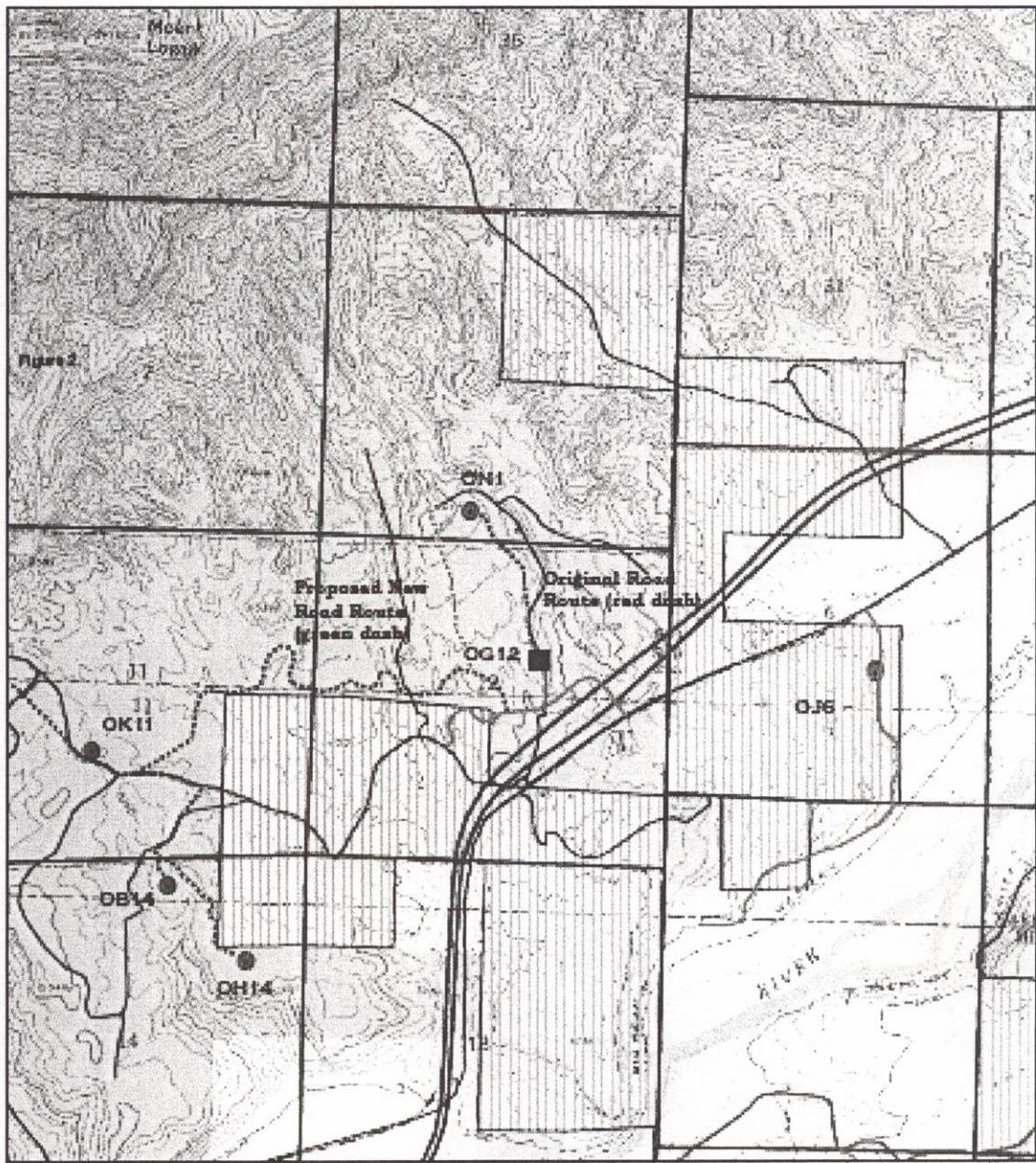
**Prepared by:** Jim Byers, Natural Resource Specialist 6/4/08

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

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

7-24-08  
 Date

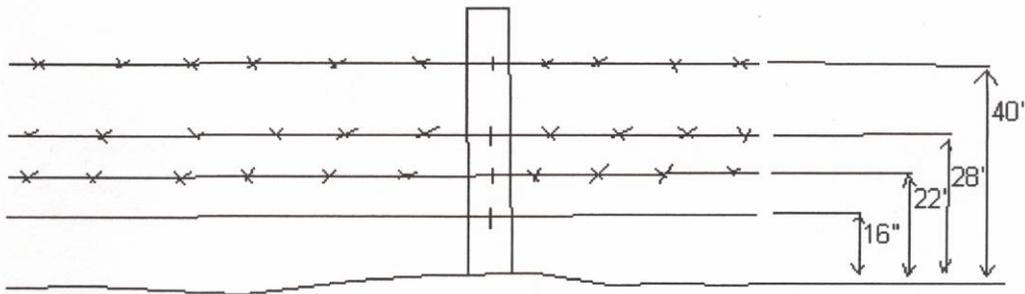
Figure 1. Project Location Map



**NORTHWEST ORCHARD AREA**  
Proposed Road Change to ON1 Pad  
T8S, R97W, Section 1, SE $\frac{1}{4}$ SW $\frac{1}{4}$   
Section 12, E $\frac{1}{2}$ NW $\frac{1}{4}$ , Sixth P.M.

**SURFACE USE CONDITIONS OF APPROVAL  
C0140-2008-102 SCE**

1. Standard Conditions of Approval identified in EA#CO140-07-141, Appendix A, shall apply and remain in full force and effect.
2. Road Construction Plans. The existing 2-track route from Northwest Orchard Access Road north to the ON1 pad shall be improved with the following requirements:
  - The road, including storm water structures, road ditches, culverts and road surfacing, shall be constructed so the road platform is not elevated in a manner that makes the road visually apparent from Interstate 70. The elevation of the road shall be lowered as much as feasibly possible and banked toward the northeast, with the spoils being piled to the West and South side of the road.
  - The gas (and water) pipeline shall be buried within or directly alongside the 16-foot road within a disturbance corridor that shall not exceed a maximum of 35 feet.
  - Excavated material developed from constructing the road and /or burying the pipeline shall be bermed directly alongside the road and within the 35 foot disturbance corridor so as to provide a reclaimable (seeded with native vegetation) visual barrier to Interstate 70 viewers.
  - The operator shall implement a regularly scheduled magnesium chloride application or other dust abatement measures as approved by the BLM authorized officer so the graveled road surface takes on and maintains a dark appearance when the road is viewed from Interstate 70. 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. Magnesium chloride or other chemical suppressant shall not be applied within 100 feet of any drainage.
  - During construction, BLM and EnCana representatives shall jointly review construction measures to determine effectiveness in meeting visual resource mitigation measures, and if subtle changes in construction techniques are warranted.
3. Fencing of Sensitive Plants. A wildlife-friendly fence in accordance with BLM standards shall be erected around the entire ON1 pad along the planned surface disturbance perimeter **prior** to pad construction startup. EnCana shall provide a qualified biologist who will flag the location of the required fence in coordination with the GSEO Ecologist and monitor the fence installation to ensure that *Sclerocactus* is not damaged inadvertently. Any excessive flagging marking known *Sclerocactus* locations shall be removed and replaced with minimal flagging. No construction activities on the road or the ON1 pad may commence until fencing has been erected and inspected by the GSEO Ecologist. Wildlife-friendly fence specifications are as follows: Four wires, upper three wires barbed, lower wire smooth; wire spacing from ground up is 16 inches, 6 inches, 6 inches, and 12 inches; maximum fence height is 40 inches (see figure on following page). If monitoring results show dust is affecting the *Sclerocactus*, an additional dust-barrier may be required. This dust-barrier would consist of a heavy-duty cloth capable of filtering out dust particles, placed along the fence (at fence height) where *Sclerocactus* occurs.



**BLM Wire Spacing and Wire Type Standards for Cattle Exclusion in Deer and Elk Habitat**

4. Monitoring of Sensitive Plants. EnCana shall provide an approved biologist to conduct a vegetation survey at least once per year during the growing season in all areas within the Northwest Orchard project area where *Sclerocactus* occurs within 200 meters of ground disturbing activities. The survey shall describe vegetation present, by species and lifeform, and shall give a description of the state of the *Sclerocactus* and habitat. Photos of each *Sclerocactus* location will be taken. A brief monitoring report shall be submitted to the GSEO with this information. The first report shall contain photographs of all *Sclerocactus* within 200 meters of the project area taken one month prior to pipeline, road, and/or pad construction and within one month after the pipeline, road, and/or pad is constructed. The entire seed-bank area should also be monitored each year for regeneration. Annual reports will be required through the production and final reclamation phases of development, unless waived by the BLM.
5. Production Equipment Placement. To better hide the separators and storage tanks planned on the ON1 pad, the production pack (separators) shall be staged toward the center west end of pad and the storage tanks shall be set in the northwest quadrant of pad. As a general rule, unless otherwise approved by BLM authorized officer, the production pack(s) and storage tanks(s) shall not be set more than 100 feet from the nearest wellhead to satisfy visual resources and reclamation objectives. Furthermore, all above-ground facilities shall be painted Shale Green (Munsell 5Y4/2) to blend with the existing landscape. Size and placement of surface facilities shall be determined by BLM and EnCana personnel after the pad has been constructed.
6. Seed Mixes. The low elevation salt-desert scrub seed mix shall be used on all BLM lands affected by the project (see Attachment 1, Table 1-1 of the letter provided to operators dated May 1, 2008). Note that the use of sterile hybrid non-native species such as Regreen or QuickGuard **shall not be used** along the ON1 pad, road, and pipeline due to visual impact of the bright green color of these hybrids.

**DOWNHOLE CONDITIONS OF APPROVAL  
Applications for Permit to Drill**

**Company/Operator:** EnCana Oil & Gas (USA), Inc.

**Surface Location:** SESW Section 1, Township 8 South, Range 97 West, 6<sup>th</sup> P.M.

<u>Well Name</u>	<u>Well No.</u>	<u>Bottomhole Location</u>	<u>Lease</u>
Federal	1-11 (ON1)	NESW Sec. 1, T. 8S, R. 97W.	COC60436
Federal	1-13 (ON1)	SWSW Sec. 1, T. 8S, R. 97W.	COC64195
Federal	1-14 (ON1)	SESW Sec. 1, T. 8S, R. 97W.	COC64195
Federal	1-15 (ON1)	SWSE Sec. 1, T. 8S, R. 97W.	COC64195

Conditions of Approval identified in the EnCana Oil & Gas (USA) Inc. Northwest Orchard EA will apply.

Please contact Steve Ficklin (970-947-5213), Julie King (970-947-5239), or Todd Sieber (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

In accordance with 43-CFR 3162.4(b) submit a complete set of electrical/mechanical logs in .LAS format with standard Form 3160-4, Well Completion or Recompletion Report and Log. Please contact Karen Conrath at 970 947-5235 or karen\_conrath@blm.gov for further clarification.