

**U.S. Department of the Interior
Bureau of Land Management
Glenwood Springs Field Office
2300 River Frontage Road
Silt, Colorado 81652**

Statutory Categorical Exclusion, DOI-BLM-CO-N040-2010-0017-SCX

Proposal: The existing Williams SG41-26 well pad, road and pipeline, analyzed in Environmental Assessment #CO-140-2006-070, was constructed during the 2009 field. After the pad was constructed, it became apparent that additional visual mitigation work is needed to comply with BLM's Class III Visual Resource Management objective. This SCX would address the actions proposed by BLM and conducted by Williams to satisfy the visual objectives of the well pad and portions of the road cut near the County Road (CR) 300 junction. The SG41-26 project lies on Federal Oil and Gas Lease COC59137.

Location: NE¹/₄NE¹/₄, Section 26, Township 7 South, Range 96 West, 6th Principal Meridian.

Project Description: After reviewing the constructed SG41-26 pad in the field with the BLM Field Manager, direction was given to BLM staff to develop a conceptual project plan that identifies specific implementation measures that would satisfy BLM's VRM Class III objectives (Figures 1a and 1b). After a series of meetings to discuss project details, Williams has agreed to actively undertake the measures to implement the visual mitigation plan prepared by BLM's Landscape Architect (services provided through contract with OTAK of Carbondale, CO). BLM Contrast Rating Forms were completed by OTAK providing visual contrast ratings prior to and after pad construction. Key Observation Point (KOP) 2 along Interstate 70 was used in the contrast ratings assessment (Attachment A). The summary provided in the visual contrast ratings provides the basis for the various project components outlined in this document.

The visual mitigation plan would be comprised of two primary components: (1) a tree removal project in two areas adjacent to the well pad that would involve cutting and removal of juniper trees (Figure 2) and (2) an excavation plan that identifies specific features to be constructed into the interim reclamation work on the well pad (Figure 3). The two project components, as well as the required seeding and shrub plantings identified in the original EA#CO140-2006-070, would be implemented to achieve the VRM Class III objective:

Land located under the VRM Class III designation can have moderate change but should still partially maintain the existing character of the landscape. Changes to the landscape in Class III areas should still repeat basic elements found in the natural features of the landscape. Management activities may attract attention but should not dominate the view of the casual observer.

Because of the time delays created by the planned 2010 well completions on 8 drilled wells and COGCC pit testing and closure requirements, pad reclamation work is not forecasted until the second half of 2010. BLM requested that the tree removal project phase of the visual mitigation work proceed during the early 2010 winter months in an effort to achieve some measurable results as early as practicable.

The tree removal work would be conducted between December 2009 and February 2010. The timing of the work is intended to avoid disturbance to the soil and hence reduce the potential for colonization by cheatgrass from nearby areas. Snow cover will prevent disturbance of the soil. Additionally, tree removal during winter will avoid the nesting season for pinyon jays, which are present year-round and breed earlier than other songbirds. The tree removal work, being similar to the harvesting of Christmas

trees, would not qualify as construction work as defined under the big game winter range Timing Limitation on the lease.

The tree removal work would be done with a hand crew operating chainsaws that would cut, buck and limb selected trees within the two identified project areas marked with flagging adjacent to the well pad (Figure 2). The tree slash generated during the clearing work would be removed by hand to selected staging areas along upper edge of the well pad. During the final stages of the interim reclamation work on the pad described under (2) above, the slash piles would be gathered with equipment and placed across the reshaped pad slopes per BLM direction. Trees that are too large to remove by hand would be felled cross-slope, limbed cleanly and left in place within the boundaries of the project areas. Limbs would also be removed and placed in the staging areas on the pad edge. The expected number of large trees to be included in the project is relatively low. Many of the existing small trees in the understory (< 4 feet in height) would remain undisturbed in the project areas to ensure juniper recruitment into the forest canopy over time. The work would be conducted during the hours of 9:00 am and 3:00 pm to minimize potential disturbance to wintering big game.

The BLM identified each tree for removal with chainsaw using flagging wrapped around the tree stem although the pattern for removal fluctuates between tree clearing and tree thinning as shown on Figure 2. In general, the center portions of the project areas would be clearcut to create natural openings with the edges of the "clearings" being thinned to varying degrees to achieve a natural appearance as seen from KOP2 along Interstate 70. Repeated visits during the tree clearing and thinning work or pad reclamation work would be conducted by BLM to gauge the effectiveness of the visual mitigation work and refinements of the proposed plan would occur based on those determinations.

OTAK developed the excavation plan for the interim reclamation of the pad site which identifies final contour lines showing conceptual reshaped landforms on the pad site (Figure 3). An important premise of OTAK's excavation plan is its use as a guide for the landforms to be created during the earthwork and using all available dirt on the pad site to construct the landforms. It is anticipated that the excavated material from the pit construction staged at the south end of the pad would be combined with some pad fill material to effectively close the reserve pit. The remaining fill material for the pad would be moved to fill the cutslope and create the OTAK-designed landforms around the working area of the pad. Locating separators and storage tanks off the pad greatly enhances the pad site reclamation opportunities. The topsoil windrowed along the upper and lower edges of the pad would be spread across the reshaped pad surfaces and approved seeding of the reclaimed slopes would follow. It is expected that the pad would undergo interim reclamation work prior to November 1, 2010 to ensure that the seeding of the reshaped pad slopes is conducted prior to the onset of winter weather and the seed can take advantage of winter snows and the following spring snowmelt moisture for optimal germination.

The amount of existing disturbance related to the pad construction is 3.6 acres as shown on Figure 3 based on GPS calculations along the disturbance perimeter. The pad reshaping work to be conducted with earthmoving equipment would remain within the existing disturbance areas. The estimated surface disturbance associated with the proposed tree removal in the two separate areas would be 3.1 acres but could be expanded depending on site evaluations as the work develops. The surface disturbance associated with the tree removal would not exceed 5 acres per SCX criteria.

The SG41-26 pad lies in Federal lease #COC59137 which is 80 acres in size. The existing disturbance created from construction of the SG41-26 pad, road and pipeline is 6.0 acres. The proposed visual mitigation work could be expected to disturb no more than 5 acres. The type of impacts associated with the additional disturbance has been identified in the SG41-26 EA.

BLM Lease Stipulations and Conditions of Approval: Specific Conditions of Approval that would be included for this action 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: #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.*

Prepared by: Jim Byers, Natural Resource Specialist 12/21/09

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



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

12-21-09

Date

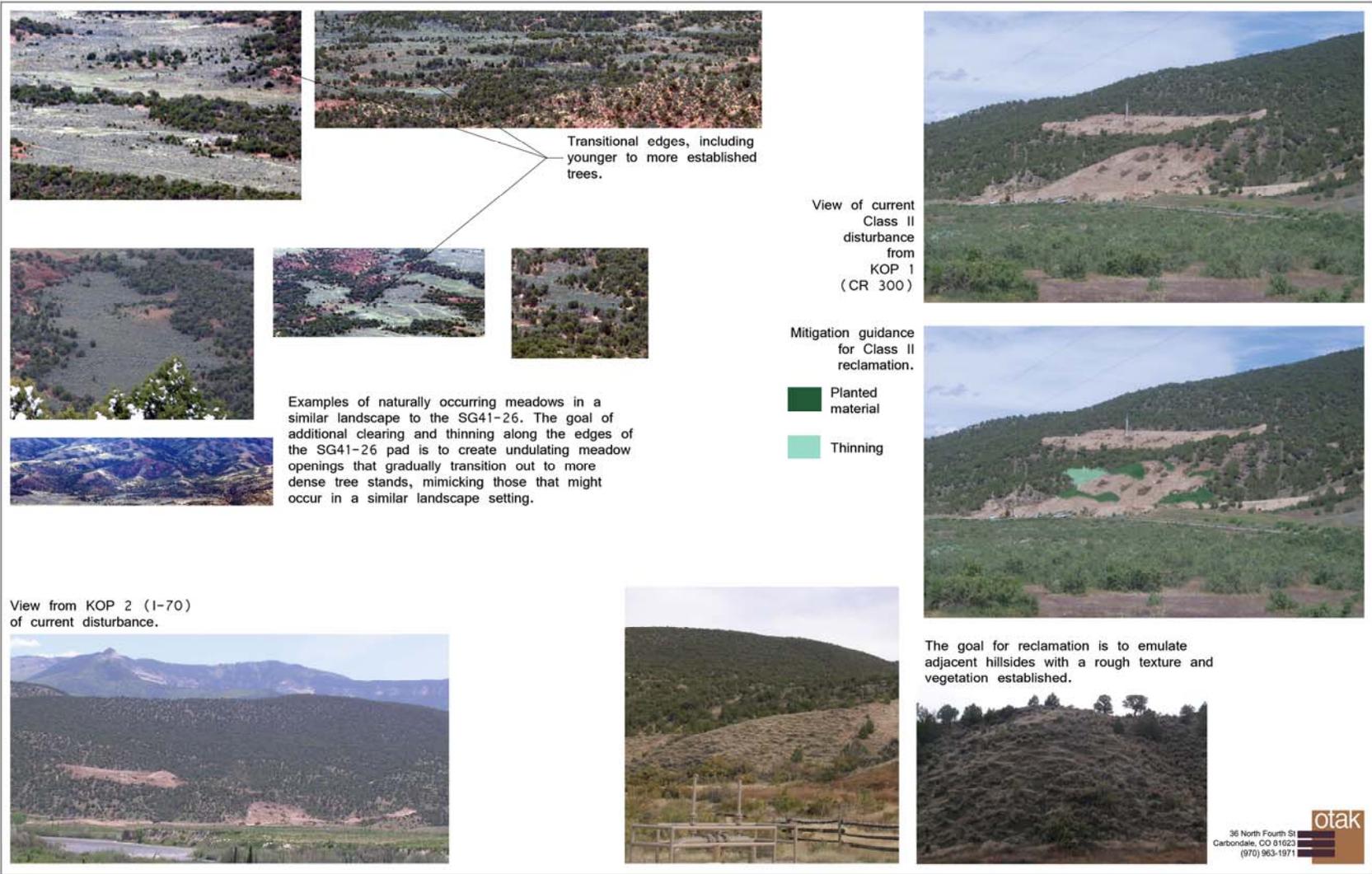


Figure 1a-Conceptual Visual Mitigation Plan for SG41-26 Pad and Road.

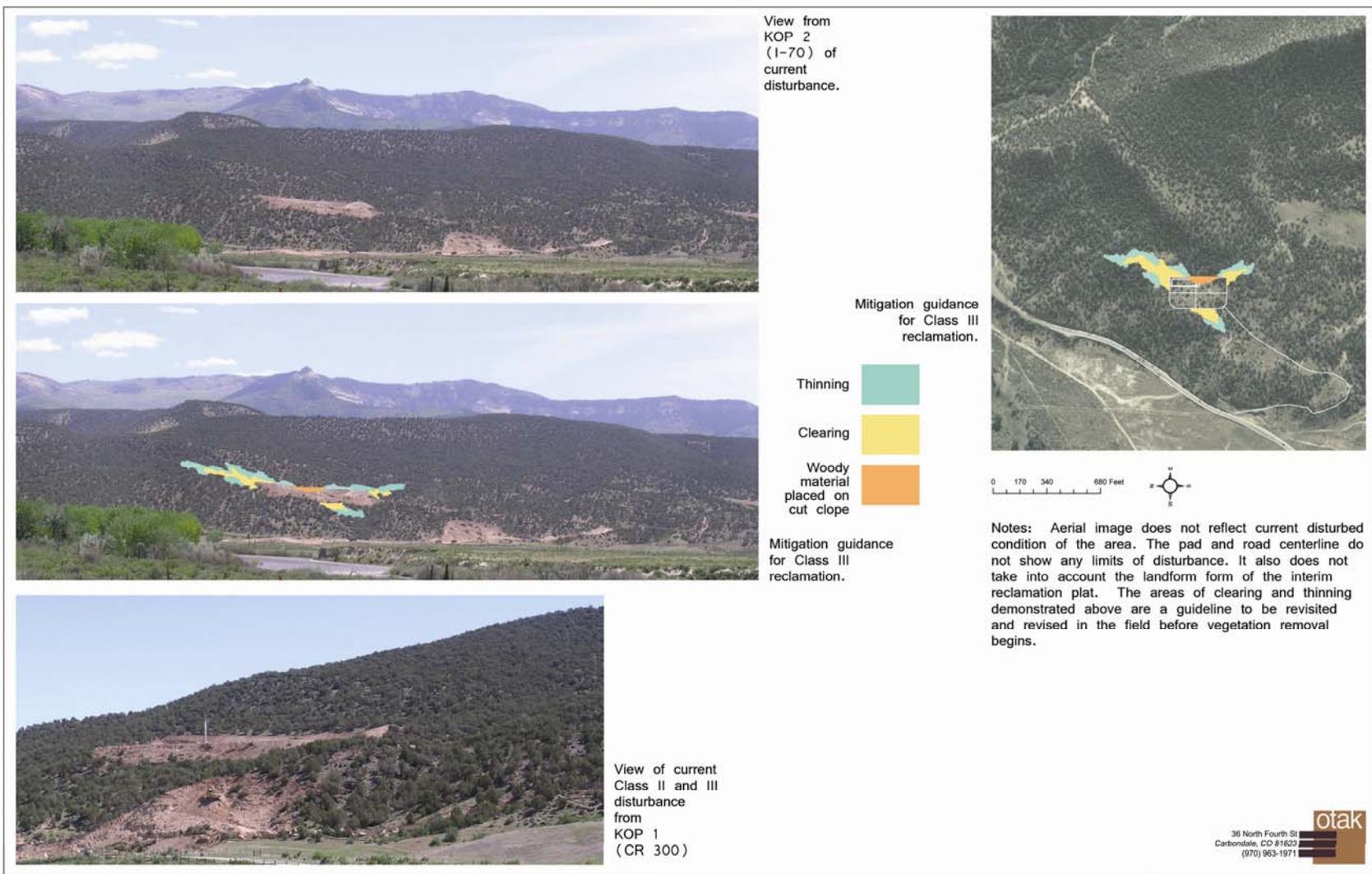


Figure 1b- Conceptual Visual Mitigation Plan for SG41-26 Pad and Road.

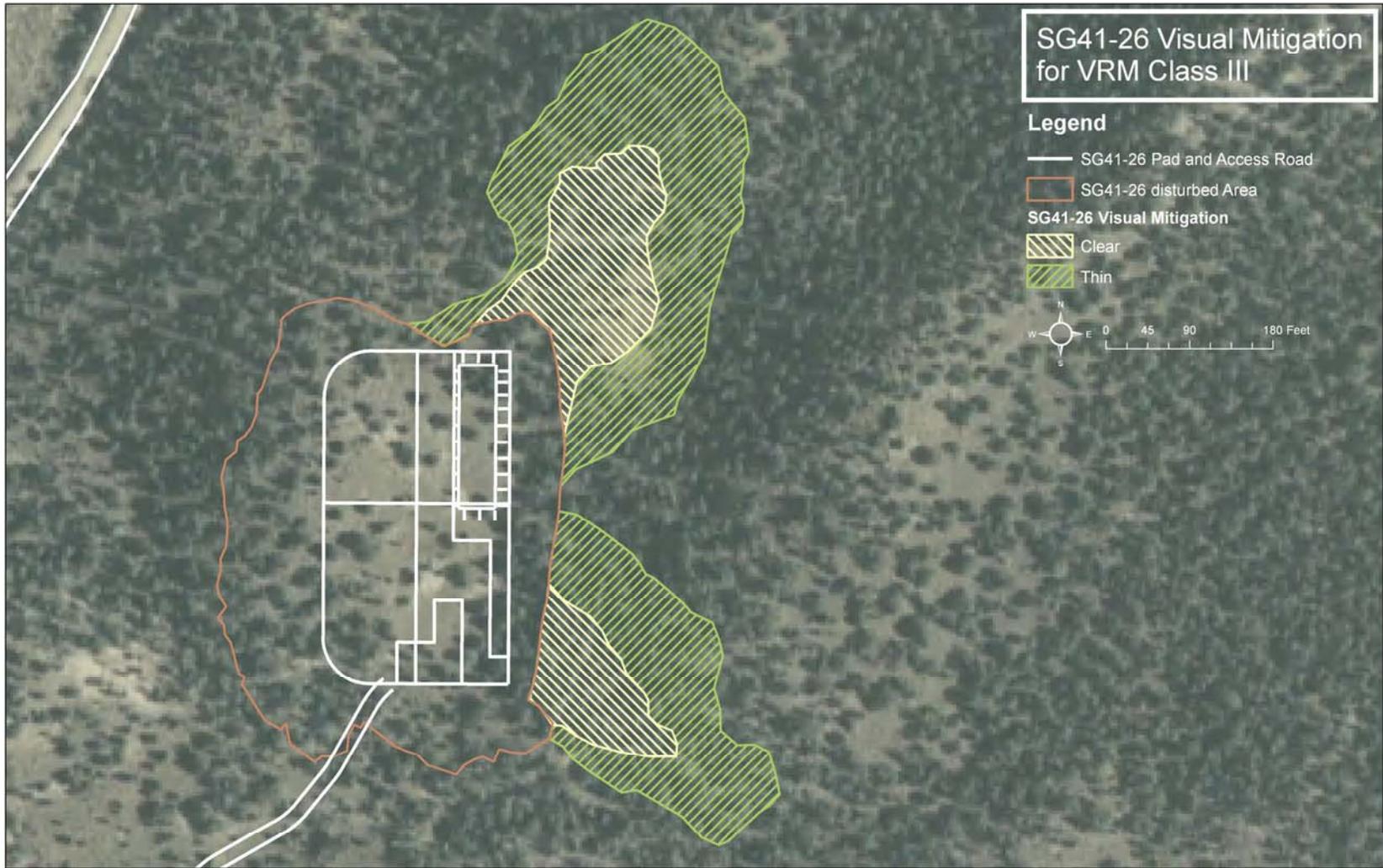


Figure 2-Tree Removal Work

Rough reclamation contours
to be used as a guide.

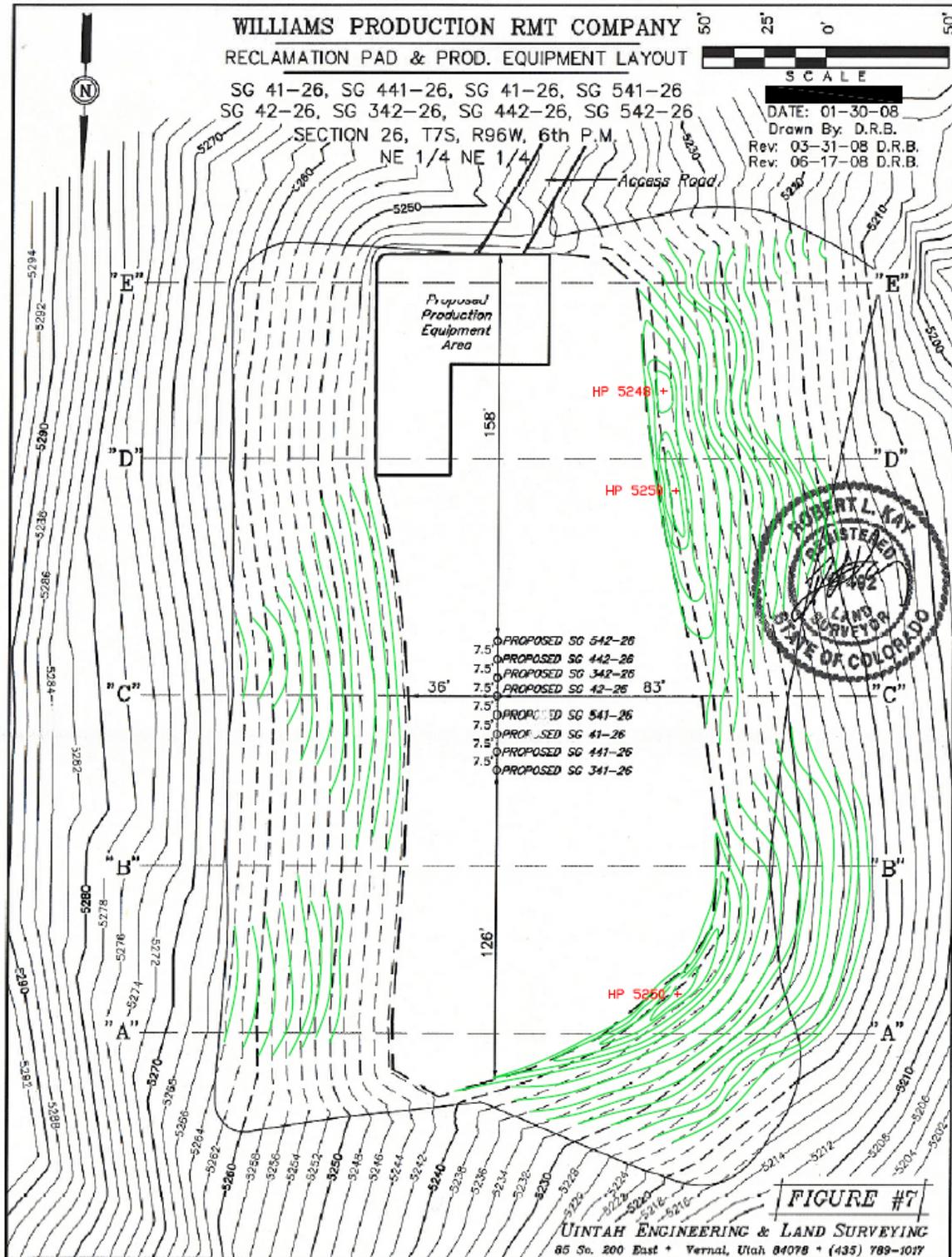


Figure 3. Interim Reclamation Plan for Pad Reshaping Developed by OTAK

**SURFACE USE CONDITIONS OF APPROVAL
DOI-BLM-C0-N040-2010-0017-SCX**

1. Startup Notification. The operator shall notify the BLM representative at least at 48 hours prior to initiation of construction. A meeting at the project site shall occur with EnCana and BLM representatives prior to construction startup.
2. Tree Removal Method: The tree removal work would be done with a hand crew operating chainsaws that would cut, buck and limb selected trees within the two identified project areas marked with flagging adjacent to the well pad (Figure 2). Height of tree stumps would not exceed 16 inches measured from uphill side. The tree slash generated during the clearing work would be removed by hand to selected staging areas along upper edge of the well pad. During the final stages of the interim reclamation work on the pad described under (2) above, the slash piles would be gathered with equipment and placed across the reshaped pad slopes per BLM direction. Trees that are too large to remove by hand would be felled cross-slope, limbed cleanly and left in place within the boundaries of the project areas. Limbs would also be removed and placed in the staging areas on the pad edge. The expected number of large trees to be included in the project is relatively low. Many of the existing small trees in the understory (< 4 feet in height) would remain undisturbed in the project areas to ensure juniper recruitment into the forest canopy over time. The work would be conducted during the hours of 9:00 am and 3:00 pm to minimize potential disturbance to wintering big game.
3. Tree Marking Scheme. The trees to be removed (cleared or thinned) in the area *southeast of the pad have pink flagging* wrapped around the tree stem. The edge of the southeast project area is marked with blue flagging. The trees to be removed (cleared or thinned) in the area *northeast of the pad have orange flagging* wrapped around the tree stem. The edge of the southeast project area is marked with pink and blue flagging.
4. Project Completion Deadline. The planned tree removal work shall be completed to the satisfaction of the BLM Authorized Officer no later than March 1, 2010 unless otherwise directed by the BLM Authorized Officer. The pad reclamation work shall be completed as outlined on Figure 3 and seeding shall be conducted on the reshaped pad no later than November 1, 2010 unless otherwise directed by the BLM Authorized Officer.
5. Cultural Education/Discovery. All persons in the area who are associated with this project shall 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 shall 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, their 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 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).

Attachment A – Visual Contrast Ratings (2)

SECTION D. (Continued)

Comments from item 2.

The Proposed Action is located on lands designated VRM Class III. Actions on Class III lands allow for a moderate level of change to the existing landscape.

The contrast in form and line of landform resulting from the pad is significant, as is the contrast in form, line, color, and texture of the vegetation due to removal of vegetation.

Additional Mitigating Measures (See item 3)

The following shall be implemented to meet Class III requirements (Pad):

- Pad reclamation cut-and-fill contours shall undulate and mimic the terrain and slopes found in the adjacent landscape.
- Clearing and thinning of the P/J stand surrounding the pad, emulating a natural opening with a transitional edge.
 - Removed tree canopies shall *not* be left intact in newly created openings. They will need to be broken down to the point they are no longer visible or hauled off and placed on reclaimed pad slopes.
- Woody debris shall be placed back on the cut-and-fill slopes to provide a color and texture closer to that found in the native landscape and in locations which fit with the patterns created by the clearing and thinning.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

Date: 05.20.2009

District/ Field Office: Glenwood Springs

Resource Area: GSFO

Activity (program): SG41-26pad Visual Mitigation

SECTION A. PROJECT INFORMATION

1. Project Name: Williams SG 41-26	4. Location Township T7S	5. Location Sketch
2. Key Observation Point : KOP 2 – I-70	Range 96W	
3. VRM Class : Class III	Section 26	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat valley floor with rolling to steep hillsides rising up to the background mountains to the south	Dense pinyon/juniper vegetation creates a solid form draped on the rolling slopes with the occasional agricultural clearing on benches and the valley floor	Horizontal, geometric, vertical
LINE	Undulating horizontals, gradual diagonals	A flowing, transitional line created by the change between vegetation coverage	Horizontal, geometric, bold
COLOR	Light tans, browns, grays	Olive green, dark green, grass green, golden browns, tans	Whites, grays, browns
TEXTURE	Fine to medium	Fine to medium, patchy	Fine

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Undulating cut-and-fill slopes	Organic void with a transitional edge	N/A
LINE	Rolling	Undulating and feathered	N/A
COLOR	Light tans, light browns	Void of noticeable vegetation, dark greens and dark browns along transitional edge	N/A
TEXTURE	Fine	Fine to medium	N/A

SECTION D. CONTRAST RATING **X** SHORT TERM LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? X Yes No (Explain on reverse side)	
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)					
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE		
ELEMENTS	FORM			X				X						X	3. Additional mitigating measures recommended Yes X No (Explain on reverse side) Evaluator's Names Date Lindsey Utter 11.13.09
	LINE				X			X					X		
	COLOR			X				X					X		
	TEXTURE				X			X					X		

SECTION D. (Continued)

Comments from item 2.

The Proposed Action is located on lands designated VRM Class III. Actions on Class III lands allow for a moderate level of change to the existing landscape.

The successful Visual Mitigation of SG41-26 pad will reduce the degree of contrast to weak for the landform form and line and the form, line, color, and texture of the vegetation.

Additional Mitigating Measures (See item 3)