

U.S. Department of the Interior  
Bureau of Land Management  
Little Snake Field Office  
455 Emerson Street  
Craig, CO 81625

## DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2009-021 DNA

CASEFILE/PROJECT NUMBER: COC 73016

PROJECT NAME: COW CAMP EXPLORATION LICENSE MODIFICATION

LEGAL DESCRIPTION:

- T5N R87W NE<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub> SEC 9
- T6N R87W SW<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub> SEC 32
- T5N R87W NW<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub> SEC 22
- T5N R87W NW<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub> SEC4
- T5N R87W NE<sup>1</sup>/<sub>4</sub>NW<sup>1</sup>/<sub>4</sub> SEC 5
- T5N R87W NW<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub> SEC 4

APPLICANT: COLORADO COAL RESOURCES, LLC (CCR)

**A. Describe the Proposed Action:** On September 1, 2008, Colorado Coal Resources was issued a coal exploration license, COC 73016; CCR drilled 6 exploration holes within their 3,980 acre exploration license. Colorado Coal Resources proposes to drill 6 additional coal exploration holes within this exploration license boundary using the same methodology on the same lands. Drill pads would be a maximum of 100ft. by 100ft.; drill pad locations would be located adjacent to existing roads on gently sloping terrain to minimize surface disturbance and reclamation; if necessary, equipment would be moved over-land without the construction of new roads.. As many as 3 each 10 feet x 5 feet by 6 feet deep mud pits would be constructed on the pad. Equipment used would be the same: truck mounted rotary drill rig, water truck, pipe truck, rig-up truck, air compressor, core trailer, D4 or D9 dozer and two or three 4 x 4 pickup trucks for the drill crews and CCR personnel. Total surface disturbance is estimated to be 1.38 acres for the six drill pads. Hole depths range from 1,230 VF. to 1,980 VF. Reclamation will immediately follow hole completion. Holes will be plugged according to BLM standards. The surface is privately owned. The current and post land use is cultivated croplands and pasture/Conservation Reserve Program lands. The sites will be double bonded with a bond required by the BLM and the State.

## **B. Land Use Plan (LUP) Conformance**

LUP Name: Little Snake Resource Management Plan and Record of Decision (ROD)

Date Approved: April 26, 1989

- Draft RMP/EIS February 1986
- Final RMP/EIS September 1986
- Colorado Oil and Gas Leasing and Development Final EIS Plan Amendment  
Date Approved: October 1991

## **C. Identify applicable NEPA documents and other related documents that cover the proposed action.**

CO-100-2008-059-EA: Cow Camp Exploration License

Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Environmental Assessment, March 1997.

## **D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?** Yes. The proposed action is identical in scope and location to the action previously analyzed in CO-100-2008-059-EA.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?** Yes. CO-100-2008-059-EA appropriately analyzed the environmental impacts and a range of alternatives that include the proposed action.

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

Yes. The proposed action would have no disproportionate impacts on minority populations or low income communities (E.O.12898) and the President's Executive Order, signed 1/10/01, which mandates evaluation of effects of actions and agency plans on migratory birds. The LSFO has reviewed the proposal and determined that the action would not adversely impact maintaining or achieving public land health as defined by the five Colorado Standards for Land Health. In November of 2008, retired Colorado Division of Wildlife (CDOW) researcher Rick Hoffman evaluated the drill sites to determine potential impacts to Columbian sharp-tailed grouse and greater sage-grouse. He determined that drill sites CCU38, CCU39, CCU43, CCU44, CCU46, and CCU48 are within suitable nesting habitat for grouse. The CDOW has reviewed Mr. Hoffman's recommendations. Upon reviewing Mr. Hoffman's recommendations CDOW provided CCR a letter of recommended protections necessary to protect grouse in the project area. In this letter, CDOW concurred that drilling may occur within the traditional NSO buffers for lek sites without impacts to the leks or breeding birds. The Colorado Division of Wildlife does feel that timing restrictions should be placed on drilling activities at these locations. No surface disturbing activities should occur between March 1 and June 30 in order to protect nesting grouse. The CDOW letter to CCR is on file in the BLM's Little Snake Field

Office.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?** Yes. CO-100-2008-059-EA methodology and analytical approach are appropriate to this proposed action.

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?** Yes. CO-100-2008-059-EA analyzed the direct, indirect, and site-specific impacts of the area covered under this current proposed action.

**6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?** Yes. As the 2008 drill hole locations have been reclaimed and these 6 - 2009 drill pads will be reclaimed immediately following plugging and abandonment, there will not be any continuing cumulative impacts from this proposed action as analyzed in CO-100-2008-059-EA.

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes. Since the proposed action is identical in scope and location as the approved exploration license, all public involvement and interagency review associated with the previous authorized plan using the existing NEPA document, CO-100-2008-059-EA, are adequate for this current proposed action.

**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented	Initials/Date
Ole Olsen	Natural Resource Specialist	Air Quality, Floodplains, Prime/Unique Farmlands, Surface Water Quality	OO 1/30/09
Robyn Morris	Archaeologist	Cultural Resources, Native American Concerns	RWM 2/4/09
Louise McMinn	Realty Specialist	Environmental Justice	LM 1/27/09
Ole Olsen	Natural Resource Specialist	Invasive Non-native Species	OO 1/30/09
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS 1/28/09
Timothy Novotny	Wildlife Biologist	T&E Animal	TMN 1/30/09
Marilyn Wegweiser	Petroleum Geologist	Ground Water Quality	
Ole Olsen	Natural Resource Specialist	Wetlands/Riparian Zones	OO 1/30/09
Gina Robison	Outdoor Recreation Specialist	WSA, W&S Rivers	GMR 2/2/09

**STANDARDS:**

<b>Name</b>	<b>Title</b>	<b>Standard</b>	<b>Initials/Date</b>
Timothy Novotny	Wildlife Biologist	Animal Communities	TMN 1/30/09
Timothy Novotny	Wildlife Biologist	Special Status, T&E Animal	TMN 1/30/09
Hunter Seim	Rangeland Management Spec	Plant Communities	JHS 1/28/09
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS 1/28/09
Ole Olsen	Natural Resource Specialist	Riparian Systems	OO 1/30/09
Ole Olsen	Natural Resource Specialist	Water Quality	OO 1/30/09
Ole Olsen	Natural Resource Specialist	Upland Soils	OO 1/30/09

**Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist\_\_\_\_\_ Date\_\_\_\_\_

Signature of NEPA Coordinator\_\_\_\_\_ Date\_\_\_\_\_

Signature of the Authorizing Official\_\_\_\_\_ Date\_\_\_\_\_

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