

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-N010-2010-0134-DNA

CASEFILE/PROJECT NUMBER: COC47671A

PROJECT NAME: Carl Allen #38, #39

LEGAL DESCRIPTION: NESW Sec. 33, T12N, R97W, 6<sup>th</sup> P.M. in Moffat County

APPLICANT: Wexpro Company

### **A. Describe the Proposed Action**

The proposed action would be to approve two Applications for Permit to Drill (APD) submitted by Wexpro Company. Wexpro Company proposes to drill two gas wells on BLM administered land located in the Powder Wash Field in Sec. 33, T12N, R97W. APDs have been filed with the LSFO for Carl Allen #38 and #39 wells. The APDs include drilling and surface use plans that cover mitigation of impacts to vegetation, soil, surface water, and other resources. Mitigation not incorporated by Wexpro Company in the drilling and surface use plans would be attached by the BLM as Conditions of Approval to an approved APD.

The proposed wells are located approximately 40 miles West of Baggs, Wyoming. These two wells will be drilled from the same location as the previously approved and analyzed Carl Allen #30 well. Buried cultural resources were discovered during the construction of the location and construction was suspended pending investigation of the discovery. The Carl Allen #30 well was moved to the Carl Allen #31 location to the west and directionally drilled.

Consultations between Wexpro, BLM, and Western Archeological Services recommended that the archeological site could be mitigated. Colorado's Office of Archeology and Historic Preservation agreed that the adverse effects to the site have been mitigated and that well pad construction could continue.

The proposed well pad has been cleared of all vegetation and construction will continue leveling the location for drilling. Topsoil and native vegetation are stockpiled for use in reclamation. Approximately 3.0 acres have been disturbed for construction of the well pad. This would include the 400' by 330' well pad, the topsoil, and subsoil piles. A reserve pit would be constructed on the well pad to hold drill mud and cuttings. The estimated duration of drilling for each well would be 20 days, to begin the summer of 2012.

If a well is a producer, cut portions of the well site would be backfilled and unused portions of the well site would be stabilized and re-vegetated. If a gas well proves unproductive, it would be properly plugged and the entire well pad and access road would be reclaimed.

Total surface disturbance for the proposed action would be the same as that analyzed for the Carl Allen #30 well.



## **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 January 1991

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

- Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Environmental Assessment, March 1997.
- CO-100-2008-104EA
- Archeological Survey Report:  
Survey ID:  
Title: WEXPRO BW Musser #34 WELL AND ACCESS ROAD CLASS III CULTURAL RESOURCE INVENTORY ( )

Author:  
Date:  
Contractor: WESTERN ARCHAEOLOGICAL SERVICES FOR THE BLM CRAIG FIELD OFFICE  
Survey ID:  
Title: MOUNTAIN FUEL RESOURCES LATERAL #198 JUMPER LINE (12-00-86)  
Author: HEAD, JAMES  
Date: 09/11/1986  
Contractor: WESTERN WYOMING COLLEGE FOR THE BLM - CRAIG DISTRICT

#### **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 current proposed action was part of the proposed actions in the previously analyzed and approved in CO-100-2008-104EA.
- 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-100-2008-104EA 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 01/10/01, which mandates evaluation of effects of actions and agency plans on migratory birds.
- 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-100-2008-104EA 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-100-2008-104EA 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.
- 7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes, the Notice of Staking is posted in the Little Snake Field Office for a minimum of 30 days before the Application for Permit to Drill is approved and issued to the applicant.

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

<b>Name</b>	<b>Title</b>	<b>Resource Represented</b>	<b>Initials/Date</b>
Roy McKinstry	Natural Resource Specialist	Air Quality, Floodplains, Prime/Unique Farmlands, Surface Water Quality	RM 8/18/10
Ethan Morton	Archaeologist	Cultural Resources, Native American Concerns	EM 5/23/11
Louise McMinn	Realty Specialist	Environmental Justice	LM 8/20/10
Chris Rhyne	Rangeland Management Spec.	Invasive Non-native Species	CR 8/27/10
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS 8/23/10
Gail Martinez	Wildlife Biologist	T&E Animal	GEM 8/24/10
Marty O'Mara	Petroleum Geologist	Ground Water Quality	
Emily Spencer	Ecologist	Wetlands/Riparian Zones	ELS 8/23/10
Shane Dittlinger	Outdoor Recreation Specialist	WSA, W&S Rivers	KSD 8/23/10

**STANDARDS:**

<b>Name</b>	<b>Title</b>	<b>Standard</b>	<b>Initials/Date</b>
Gail Martinez	Wildlife Biologist	Animal Communities	GEM 8/24/10
Gail Martinez	Wildlife Biologist	Special Status, T&E Animal	GEM 8/24/10
Hunter Seim	Rangeland Management Spec	Plant Communities	JHS 8/23/10
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS 8/23/10
Emily Spencer	Ecologist	Riparian Systems	ELS 8/23/10
Roy McKinstry	Natural Resource Specialist	Water Quality	RM 8/18/10
Roy McKinstry	Natural Resource Specialist	Upland Soils	RM 8/18/10

**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 constitute BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist /s/ Shawn Wiser Date 05/25/11

Signature of NEPA Coordinator /s/ Barb Blackstun Date 05/25/11

Signature of the Authorizing Official /s/Jennifer Maiolo for Wendy Reynolds Date 05/31/11

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.