

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-N010-2010-0054-DNA

CASEFILE/PROJECT NUMBER:

COC63212X Focus Ranch Unit Pipeline to Butter Lake Well #32-10
COC074374 Focus Ranch Right-of-Way Pipeline

PROJECT NAME: Focus Ranch Gas Gathering and Production Liquid Conveyance Pipelines

LEGAL DESCRIPTION:

COC63212X Unit operations:

Routt County, Colorado – 6th PM, T.12 N., R. 89 W., sec. 32.

COC074374 Right-of-Way portion:

Moffat County, Colorado - 6th PM, T. 12 N., R. 89 W., sec. 24, W $\frac{1}{2}$ SW $\frac{1}{4}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ N $\frac{1}{2}$ SE $\frac{1}{4}$, and NE $\frac{1}{4}$ SE $\frac{1}{4}$.

Routt County, Colorado - 6th PM, T. 12 N., R. 88 W., sec. 30, Lot 6, 7, 9-11,16, SW $\frac{1}{4}$ SE $\frac{1}{4}$, sec. 31, E $\frac{1}{2}$ NW $\frac{1}{4}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, and NE $\frac{1}{4}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$.

APPLICANT: Entek GRB LLC

A. Describe the Proposed Action

The proposed action would be the permanent installation of a welded steel or equivalent gas gathering pipeline and a high-density polyethylene (HDPE) or equivalent production liquid conveyance pipeline with required appurtenances along the existing +/- 4.4 mile of the Focus Ranch Unit access road to the Butter Lake Well #32-10. The access road is located on 4.0 miles of federal and 0.4 miles of private surface. Approximately 15,207 feet of the pipeline would be constructed outside of the Focus Ranch Oil & Gas Unit boundary; this portion of pipeline would require a federal Right-of-Way (ROW). Approximately 5,808 feet of the pipeline would be constructed within the Focus Ranch Unit and would be authorized via sundry notice as a unit operation. Construction would be anticipated to occur over a 40 to 60 day period beginning the summer of 2010. Pipeline installation would likely start at the Butter Lake Well #32-10 and would terminate at the Slater Dome Central Delivery Point on private land. Both the steel and HDPE pipelines would be installed in the same trench and it is anticipated that 1,000 to 1,500 linear feet of pipeline would be installed and backfilled on a daily basis. To minimize impact to

wildlife, trench would be either backfilled or covered with steel plates at the end of each day.

The top of each pipeline would be located a minimum of 4 feet below the existing roadway surface. In addition, the pipelines would be advanced below existing structures in the access road. These structures include cattle guards and culverts ranging in diameter from 18-inch to 96-inch. It is anticipated that one of three techniques would be used to advance the gas and water pipelines below the structures. The first would be to remove the structures, trenching, installing the pipes, backfilling and replacing the structures. Second would be to install jacking pits on either side of the structure and advancing the pipelines between jacking pits. The third would be to bore horizontally below the structures and install the pipelines in the bores. The technique that would be anticipated to create the least impact on the surrounding environment would be chosen for each structure crossing. It would be anticipated that boring would be utilized at the major drainages of Fly Creek, Government Corral Creek, and Cantling Creek. Included with the Plan of Development for the proposed action is a Storm Water Plan, Fire Prevention and Suppression Plan, and a Spill Prevention and Contingency Plan.

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.

CO-100-2003-058 EA for Focus Ranch Well #12-1 and access road.

CO-100-2010-0099 EA for Butter Lake Well #32-10.

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 pipeline is within the access road area analyzed in CO-100-2003-058 EA and the purpose of this action is to convey natural gas and production liquid from the approved natural gas well, the Butter Lake Well #32-10.

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, several alternatives were analyzed in CO-100-2003-058 EA which

adequately address current environmental concerns, interests, and resource values. The range of alternatives is appropriate given the limited scope of this proposal. No new road construction will occur. The buried gas pipeline would be located entirely within the existing oil & gas access road area and tie into an existing gas well pad.

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

Yes. State water quality standards have been updated since CO-100-2003-058 EA was written. As of 2008, all tributaries to the Little Snake River from its first crossing of the CO/WY border to a point immediately below the confluence with Fourmile Creek must meet Aquatic Life Cold 1, Recreation P, and Agriculture classifications. All tributaries to the Little Snake River, which includes Fly Creek and Government Corral Creek within the proposed project area, are now on the Colorado Department of Public Health and Environment's Monitoring and Evaluation List for suspected *E. coli* and iron issues. Water bodies on this list have suspected water quality problems, but there is also uncertainty regarding one or more factors, such as source of problem and/or supporting data. The project as proposed will have no effect on *E. coli* or iron issues in the Little Snake River or any of its tributaries.

Also, the proposed pipeline route is adjacent to and bisects two small areas of land that are considered farmland of statewide importance in Routt County. Because the pipeline will be placed in a previously disturbed right-of-way for the existing road, the project would not further compromise any significance or importance placed on these areas.

When CO-100-2003-058 EA was written, greater sage-grouse were (and still are) a BLM sensitive species. Recently, greater sage-grouse have also become a Candidate for ESA listing. BLM manages all ESA Candidate species as BLM sensitive species. Impacts to greater sage-grouse were thoroughly analyzed and mitigated in CO-100-2003-058EA. This analysis is still valid.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes, the methodology and analytical approach is still valid. The buried gas pipeline would be located entirely within the existing oil & gas access road area and tie into a proposed gas well pad analyzed in CO-100-2010-0099 EA.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Yes.
Does the existing NEPA document analyze site-specific impacts related to the current proposed action? Yes, the direct and indirect impacts of this proposed action are substantially unchanged from those identified in CO-100-2003-058 EA and CO-100-2010-0099 EA. The pipeline installation would add no additional surface disturbance beyond the existing road and well pad area.

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, the cumulative impacts that would result from the installation of the pipeline

are substantially unchanged from those analyzed in CO-100-2003-058 EA and CO-100-2010-0099 EA. The potential exists for future oil and gas development throughout the Focus Ranch Unit.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Yes, the public involvement and interagency review associated with CO-100-2003-058 EA and CO-100-2010-0099 EA are adequate for this proposed action. This project, CO-100-2003-058 EA, and CO-100-2010-0099 EA are posted on the NEPA log on the Little Snake Field Office website:
http://www.blm.gov/co/st/en/BLM_Information/nepa/lso.html

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

Name	Title	Resource Represented	Initials/Date
Emily Spencer	Ecologist	Air Quality, Floodplains, Prime/Unique Farmlands, Surface Water Quality	ELS 08/09/10
Robyn Morris	Archaeologist	Cultural Resources, Native American Concerns	RWM 03/15/10
Louise McMinn	Realty Specialist	Environmental Justice	LM 08/02/10
Christina Rhyne	Rangeland Management Specialist	Invasive Non-native Species	CR 03/29/10
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS 03/30/10
Desa Ausmus	Wildlife Biologist	T&E Animal	DA 03/19/10
Marty O'Mara	Geologist	Ground Water Quality	EMO 04/06/10
Emily Spencer	Ecologist	Wetlands/Riparian Zones	ELS 08/09/10
Gina Robison	Outdoor Recreation Specialist	WSA, W&S Rivers	GMR 04/07/10

STANDARDS:

Name	Title	Standard	Initials/Date
Desa Ausmus	Wildlife Biologist	Animal Communities	DA 03/19/10
Desa Ausmus	Wildlife Biologist	Special Status, T&E Animal	DA 03/19/10
Hunter Seim	Rangeland Management Spec	Plant Communities	JHS 03/30/10
Hunter Seim	Rangeland Management Specialist	Special Status, T&E Plant	JHS 03/30/10
Emily Spencer	Ecologist	Riparian Systems	ELS 08/09/10
Emily Spencer	Ecologist	Water Quality	ELS 08/09/10
Emily Spencer	Ecologist	Upland Soils	ELS 03/11/10

REMARKS:

CULTURAL RESOURCES

Affected Environment: Cultural resources, in this region of Colorado, range from late Paleo-Indian to Historic. For a general understanding of the cultural resources in this area of Colorado, see *An Overview of Prehistoric Cultural Resources, Little Snake Resource Area, Northwestern Colorado*, Bureau of Land Management Colorado, Cultural Resources Series, Number 20, *An Isolated Empire, A History of Northwestern Colorado*, Bureau of Land Management Colorado, Cultural Resource Series, Number 2 and *Colorado Prehistory: A Context for the Northern Colorado River Basin*, Colorado Council of Professional Archaeologists.

Environmental Consequences: The proposed project, Focus Ranch Gas Gathering and Production Liquid Conveyance Pipelines, has undergone a Class III cultural resource survey:

Hammack, Laurens C.

2004 Clayton Williams Energy, Inc. Focus Ranch Unit Federal 12-1 Access Road, Moffat and Routt Counties (BLM# 67.2.04)

The survey identified no eligible to the National Register of Historic Places cultural resources. The proposed project may proceed as described with the following mitigative measures in place.

Mitigative Measures:

The following standard stipulations apply for this project:

1. The operator is responsible for informing all persons who are associated with the operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are encountered or uncovered during any project activities, the operator is to immediately stop activities in the immediate vicinity of the find and immediately contact the authorized officer (AO) at (970) 826-5000. Within five working days, the AO will inform the operator as to:

- Whether the materials appear eligible for the National Register of Historic Places;
- The mitigation measures the operator will likely have to undertake before the identified area can be used for project activities again; and
- Pursuant to 43 CFR 10.4(g) (Federal Register Notice, Monday, December 4, 1995, Vol. 60, No. 232) the holder of this authorization must notify the AO, by telephone at (970) 826-5000, and 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), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

2. If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation costs. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

Name of specialist and date: Robyn Watkins Morris 03/15/10

T&E ANIMAL SPECIES

Mitigative Measures: CO-30 Grouse nesting habitat. Greater sage-grouse and Columbian sharp-tailed grouse leks will be avoided by 2 miles between March 1 and June 30 to protect nesting grouse.

Name of Specialist and Date: Desa Ausmus 03/19/10

SURFACE WATER QUALITY

Mitigative Measures: All water required for the boring activities will be delivered to the project area in tanks and no additives/chemicals will be used in the boring program. Water from local streams will not be used.

Bankfull line and 50 foot offset from the bankfull line will be clearly marked along the access road and boring pits, boring equipment and required construction materials will be located outside this 50 foot setback.

If groundwater is encountered a sump will be used to remove and direct the water toward a hay bale filter system prior to being discharged downstream in Fly Creek.

If groundwater is encountered during the boring process that is in the amount that water rights infringement may become an issue (greater than a truckload (2000 gallons), as an example) then the Colorado Division of Water Resources must be consulted to determine if a water right will be needed.

Name of Specialist and Date: Emily Spencer 08/09/10

WILDLIFE, TERRESTRIAL

Mitigative Measures: CO-09 Big game winter range. No surface disturbing activities between December 1 and April 30 in order to prevent disturbance of big game using critical winter range.

Name of Specialist and Date: Desa Ausmus 03/19/10

RECREATION

Mitigative Measures: To retain the backcountry type of use and quality big game rifle hunting, no surface disturbing oil and gas project activities (i.e. construction, drilling, completion, testing) would allowed 48 hours prior to the opening of the fall big game deer and elk rifle season in October to December 1st of any given year. The proposed action would within the extensive Recreation Management Area of the Little Snake Resource Area.

No motorized use of the road by Entek GRB, LLC would be authorized 48 hours prior to rifle hunting seasons of each year (October to December 1st). Equipment would be moved off of BLM lands prior to this time to retain the backcountry characteristics of the area during big game rifle hunting seasons.

Equipment would not be driven or staged outside of the road construction limits or BLM approved staging areas on BLM lands.

Name of Specialist and Date: Gina Robison 04/07/10

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 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.