

**U.S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641**

DETERMINATION OF NEPA ADEQUACY (DNA)

NUMBER: DOI-BLM-CO-110-2011-0111-DNA

PROJECT NAME: Saga Petroleum LLC Bareground PUP

LEGAL DESCRIPTION:

Township	Range	Sections, Lots, or portions thereof
2 North	102 West	24, 25
2 North	101 West	19, 30

APPLICANT: Saga Petroleum LLC

ISSUES AND CONCERNS:

DESCRIPTION OF PROPOSED ACTION: Saga Petroleum LLC has submitted a pesticide use proposal (PUP) to conduct bareground treatments around well heads and production facilities associated with oil and gas development in the Northeast Rangely Unit. The proposed herbicide to be used is Krovar I DF (Diuron + Bromacil) at a rate of 12 pounds/acre. It is estimated that 6 acres will be treated, and treatments will be limited to a 10 foot buffer around well-heads and production facilities.

All herbicidal application will be under the control of a Certified herbicide applicator and a current PUP which specifies the area targeted, the chemical to be used, and sensitive areas. Control activities would be in compliance with the Record of Decision: Vegetation Treatment on BLM Lands in Seventeen Western States (BLM 2007) and the White River Field Office Integrated Weed Management Plan (BLM 2010).

LAND USE PLAN (LUP) CONFORMANCE REVIEW:

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

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Date Approved: July 1, 1997

The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP decision(s):

Decision Number/Page: Page 2-13

Decision Language: "Manage noxious weeds so that they cause no further negative environmental aesthetic or economic impact."

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing NEPA documents that cover the Proposed Action.

Name of Document: White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS).

Date Approved: July 1, 1997

Name of Document: Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement.

Date Approved: September 30, 2007

Name of Document: White River Field Office Integrated Weed Management Plan
DOI-BLM-CO-110-2010-0005-EA

Date Approved: March 19, 2010

NEPA ADEQUACY CRITERIA:

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation: Yes, the proposed chemical treatments in the Proposed Action were a feature of the analysis in the White River Field Office Integrated Weed Management Plan (DOI-BLM-CO-110-2010-0005-EA). This environmental assessment (EA) covers the alternatives for doing bareground treatments around oil and gas facilities within the field office boundary.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation: Four alternatives, the Proposed Action, the No Action Alternative, No Aerial Application of Herbicides Alternative, and the No Herbicide Use Alternative were analyzed in DOI-BLM-CO-110-2010-0005-EA. No reasons were identified to analyze additional alternatives and these alternatives are considered to be adequate and valid for the Proposed Action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

Documentation of answer and explanation: Yes, the analysis in the EA listed above is still valid. It is not expected that new information or circumstances would substantially change the analysis of the new Proposed Action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation: Yes, the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action is similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document, DOI-BLM-CO-110-2010-0005-EA.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?

Documentation of answer and explanation: Yes, consultation occurred between the BLM and the US Fish and Wildlife Service for environmental assessment, DOI-BLM-CO-110-2010-0005-EA. In addition, lists of the current NEPA documents (projects) are available for review on the White River Field Office webpage.

INTERDISCIPLINARY REVIEW: The Proposed Action was presented to, and reviewed by the White River Field Office interdisciplinary team on April 26, 2011. A list of resource specialists who participated in this review is available upon request from the White River Field Office.

REMARKS:

Cultural Resources: All treatments are proposed for previously disturbed ground which should have been previously inventoried for the various developments, and also meets the BLM criteria in the BLM 8100 manual for waiver of inventory requirements. There should be no new impacts to cultural resources provided all vehicular traffic is restricted to existing roads or disturbed ground. The normal half-life of herbicides is not expected to cause any impacts to cultural resources. An indirect impact of herbicide application is the unlawful collection of artifacts and vandalism. (KB 5/11/2011)

Native American Religious Concerns: No known concerns. (KB 5/11/2011)

Paleontological Resources: Provided that all vehicular traffic is restricted to existing roads or disturbed ground, it is not anticipated that there will be any new impacts to fossil resources from application of liquid herbicides. The normal half-life of herbicides is not expected to cause any impacts to fossil resources. An indirect impact of herbicide application is the unlawful collection and vandalism of vertebrate fossils. (KB 5/11/2011)

Threatened and Endangered Wildlife Species: The project area is broadly encompassed by white-tailed prairie dogs, a BLM sensitive species. These species provide habitat for several special status species including burrowing owl and ferruginous hawk, both BLM sensitive, and black-footed ferret (federally endangered). Black-footed ferrets were reintroduced into Colorado (Wolf Creek Management Area) and Utah (Coyote Basin Management Area) in 2001. These reintroduction sites are located approximately 17 miles northeast and 15 miles southwest, respectively of the project area. While there is potential for ferrets to occupy or at least incidentally use the greater Coal Oil Basin (west of the project area), there have been no documented observation of ferrets in the project area or surrounding basin. Occupation of the project area itself by black-footed ferrets would be extremely unlikely due to the low density of prairie dog habitat.

Intensive burrowing owl surveys were conducted throughout the project area in 2009. No birds were observed in the project area however, two nests were documented just west of the project area. These sites were revisited in April 2011 at which time no birds were observed. While there is potential for these birds to nest throughout the project area it is unlikely that with the appropriate mitigation measures the Proposed Action would have any influence on special status species. Treatments are confined to previously disturbed areas (well pads) which generally do not provide any substantive forage or cover resources for resident wildlife. (LRB 05/11/11)

Threatened and Endangered Plant Species: There are no special status plant species within the proposed project area.

MITIGATION:

Cultural Resources

1. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts. If archaeological materials are discovered as a result of operations under this authorization, the applicant must immediately contact the appropriate BLM representative.
2. The applicant is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands. If any paleontological resources are discovered as a result of operations under this authorization, the applicant must immediately contact the appropriate BLM representative.

Terrestrial Wildlife:

3. The applicator should be aware of all SOPs (Appendix C), mitigation measures (Appendix D) and conservation measures (Appendix E) regarding special status species/terrestrial wildlife/migratory birds required in DOI-BLM-CO-110-2010-0005-EA.
 - Do not broadcast spray diuron, in black-footed ferret habitat or in areas adjacent to black-footed ferret habitat under conditions when spray drift onto the habitat is likely.
 - To minimize risks to terrestrial wildlife, do not exceed the typical application rate for applications of diuron where feasible.
 - Minimize the size of application areas, where practical, when applying diuron to limit impacts to wildlife, particularly through contamination of food items.
 - Do not apply diuron in rangelands and use appropriate buffer zones to limit contamination of offsite vegetation, which may serve as forage for wildlife.
 - Broadcast application would only be permitted for bare ground treatments in black-footed ferret habitat. For bare ground treatments, the area to be treated will be limited to a distance of up to 10 feet (3m) from the edge of well heads, meter houses, tanks, etc. Equipment enclosed in fences would be protected from the encroachment of vegetation out to the fence. Aerial application would not be used for bare ground treatments.

COMPLIANCE PLAN (optional): On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during and after construction. Specific mitigation developed in this document will be followed. The operator will be notified of compliance related issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

NAME OF PREPARER: Matthew Dupire

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

DATE: 06/01/2011

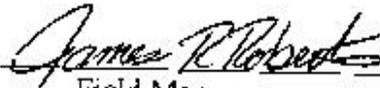
ATTACHMENTS: Map 1: Map of Herbicide Treatment Areas

CONCLUSION

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Based on the review documented above, I conclude that this proposal in consort with the applied mitigation conforms to the land use plan and that the NEPA documentation previously prepared fully covers the Proposed Action and constitutes BLM's compliance with the requirements of NEPA.

SIGNATURE OF RESPONSIBLE OFFICIAL:


Field Manager

DATE SIGNED: 6/2/2011

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

