

**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-110-2011-0055-DNA

CASEFILE/PROJECT NUMBER: COC69157 (amend)  
COC72663 (amend)

PROJECT NAME: Four Exxon CPS stations at three locations

LEGAL DESCRIPTION: Sixth Principal Meridian  
T.1S., R.97W.,  
sec. 28, NW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>.  
T.2S., R.97W.,  
sec. 11, NE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub>.  
sec. 28, SW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub>,

APPLICANT: Exxon Mobil Corp

ISSUES AND CONCERNS: There are no issues or concerns that have not been previously addressed in existing NEPA documents.

DESCRIPTION OF PROPOSED ACTION:

Background: Major trunk pipelines were analyzed in the Piceance Development Project (PDP) Environmental Assessment (EA) CO-110-2005-219. Protection of the lines as described in the document is as follows: “the lines would be designed to be “smart” piggable to provide a mechanism for future maintenance and surveillance. Each gas gathering system would also have corrosion test probes and coupons to actively monitor effectiveness of the inhibition program. Because the slug catcher system is subject to corrosion, an active inhibition program would be designed and implemented.”

Cathodic protection was specifically addressed: “The proposed steel pipelines would require aboveground cathodic test stations to monitor the effectiveness of the cathodic protection, a technique for protecting a metal object from corrosion by connecting it electrically to a more readily oxidizable metal. The test stations would be placed within the designated corridor at approximate one-mile intervals and on either side of road crossings.”

Project Description: Exxon Mobil Corporation (Exxon) has requested authorization from the White River Field Office (WRFO) to install Cathodic Protection Stations (CPS) to protect

existing pipelines. The CPS facilities are ancillary to the existing pipelines. Survey plats, system diagrams, and maps were included in the applications and are located in the file. All activities will be confined to the right-of-way or adjacent disturbance. Equipment and material will be trucked to the sites. Electrical cables will be trenched and buried a minimum of two feet deep as per Colorado State and Rio Blanco County electrical standards. No industrial wastes or toxic substances will be generated or stored on the right-of-way. All disturbances will be located on previously disturbed ground. Exxon requests a right-of-way 20 feet wide.

The proposal is in response to the Office of Pipeline Safety, Department of Transportation (PHMSA) advisory issued January 4, 2011 to all pipeline operators that integrity must be assessed on all hydrocarbon transport pipelines. The overall project consists of 14 sites, but only four are on public lands. Maps of the sites of public lands are attached in Exhibit A.

The method of installation of the facilities is as follows:

Hatch Gulch Site: One 50 volt DC 100 amp rectifier will be set on the site and connect to electrical power from existing PDP facilities. Buried electrical cables will extend from the rectifier location to a single deep well anode bed and to an existing 24-inch diameter gas gathering trunk line. The anode well location will be augured or hydrovacuum excavated to 12 feet vertical depth with surface holes 10 inches in diameter. An estimated three workers using three vehicles will complete the work. Access will require a fence to be taken down and repaired following installation. The total length of the facility will be 550 feet.

PCU T62X-11G Site: One 75 volt DC 25 amp rectifier will be set on the site. Buried electrical cables will extend from the rectifier to a single anode ground bed and the 24-inch existing pipeline. The anode well location will be air drilled to 300 feet vertical depth with a surface hole 10 inches in diameter. Fifteen 2284Z style anodes will be daisy-chained together and suspending in the deep anode well. An estimated three workers using three vehicles and a single drill rig will complete the work. The total length of the facility will be 1,000 feet.

Hunter Creek Site: Two 75 volt DC 25amp rectifiers will be set adjacent to the existing Hunter Creek Water Well No. 3. Buried 8-gauge electrical cables will extend from the rectifier locations to two buried anode beds and to an existing 26-inch pipeline. The anode locations will be drilled to 12 feet vertical depth and surface holes will be 10 inches in diameter. Twenty-two 2684Z anodes will be installed together with 8-gauge electrical wire. An estimated three workers using three vehicles will complete the work. The total length of the facility will be 700 feet.

The two Hunter Creek sites will be authorized by an amendment to COC69157 and the Hatch Gulch and PCU T62S-11G sites will be authorized by an amendment to COC72663.

#### LAND USE PLAN (LUP) CONFORMANCE REVIEW:

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

Date Approved: July 1, 1997

Decision Number/Page: Page 2-49

Decision Language: “To make public lands available for the siting of public and private facilities through the issuance of applicable land use authorizations, in a manner that provides for reasonable protection of other resource values.”

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: CO-110-2005-219-EA, Piceance Development Project.

Date Approved: April 23, 2007

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, this Proposed Action was a part of the project analyzed in CO-110-2005-219-EA and its FONSI. The action was addressed as a element of the project-wide analysis with the specific locations to be designated at a later date. See “Background” section of the project description.

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:* Three alternatives and the no action alternative were analyzed in addition to the Proposed Action and provided a reasonable range of alternatives in CO-110-2005-219-EA. No reasons to analyze additional alternatives to the Proposed Action were presented or raised, 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, or 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 existing analysis remains valid for the current Proposed Action. There is no known new information or circumstances that would substantially change the conclusion of the existing analysis.

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 resulting from the implementation of the current Proposed Action would be the same or similar to those already analyzed in CO-110-2005-219-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, CO-110-2005-219-EA was prepared with Federal, State, and local input, including the United States Fish and Wildlife Service. Comments were addressed in the final document. In addition, the previous and current NEPA documents 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 February 22, 2011. A list of resource specialists who participated in this review is available upon request from the White River Field Office.

REMARKS:

*Cultural Resources:* CPS at T62G-11G well site: The proposed CPS location and power line drop are located in areas that have been extensively and intensively inventoried for cultural resources: (Bott 2004, compliance dated 10/18/2004; Bott 2005, compliance dated 5/13/2005; and Conner 1998, compliance dated 6/19/1998). There will be no new impacts to cultural resources related to the installation of this CPS unit.

Hatch CPS station: portions of the CPS unit, exclusive of the anode bed, have been inventoried as a Class III (100% pedestrian) inventory. The anode bed location in the alluvial bottom of Piceance Creek is unlikely to have impacts based on the abundance of previous inventory data in the area: (Redman et al. 2004, compliance dated 6/24/2005; Berg et al. 2007, compliance dated 6/26/2008; Elkins 2008, compliance dated 12/10/2008; Reed 2007, compliance dated 9/4/2007; and Kintz 2009, compliance dated 9/11/2009).

Hunter Creek 1 & 2 CPS locations: The proposed Hunter Creek 1 & 2 locations are in an area that has been inventoried as a Class III (100% pedestrian) level: (Brogan 2006, compliance dated 3/13/2006 and Reed 2007, compliance dated 9/4/2007. One site, 5RB.5037 – a historic brush fence, is located in the area proposed for the anode beds. The area proposed for the anode beds appears to represent a gap created in the fence by a previous project. The fence has been determined to be ineligible at that location as no Historic Properties are present for the project. (MRS 3/8/2011)

*Native American Religious Concerns:* No Native American Religious Concerns are known in the area, but none have been noted by Northern Ute tribal authorities. Should recommended inventories or future consultations with Tribal authorities reveal the existence of such sensitive properties, appropriate mitigation and/or protection measures may be undertaken. (MRS 3/8/2011)

*Paleontological Resources:* The proposed CPS locations, T62X-11G, Hatch Gulch and Hunter 1 & 2 are located in an area generally mapped as the Uinta Formation (Tweto 1979) which the WRFO has classified as a PFYC 5 formation meaning it is known to produce scientifically noteworthy fossil resources (Armstrong and Wolny 1989). Drilling narrow holes has the potential to impact noteworthy fossils, however identification and evaluation is virtually impossible due to restricted visibility. If it should be determined that a horizontal bed is necessary for any of the anodes and it is necessary to excavate into the underlying rock to establish the anode bed then identification and evaluation of any fossils that might be present is possible. There is a somewhat greater likelihood of impacting noteworthy fossil resources. (MRS 3/8/2011)

*Threatened and Endangered Wildlife Species:* There are no special status species that would be impacted by the Proposed Action. The project area is encompassed by mule deer severe winter range – a specialized component of winter range that periodically supports virtually all of an area's deer under the most severe winter conditions (i.e., extreme cold and heavy snow pack). No activity is allowed from January 1 – April 30. The Hatch Gulch CPS station is located immediately adjacent to Rio Blanco Country Road 5, a heavily traveled, paved road. It is

unlikely that activities associated with the CPS installation would influence local deer populations. Similarly, the PCU T62X-11G site is located on and immediately adjacent to the PCU 762X-11G well pad. The ridgeline on which this pad is located is heavily developed and currently experiences substantial vehicle traffic. The Hunter Creek site, although nestled in a developed area, currently does not experience the activity level (vehicle traffic, etc.) as the other two sites. There is a known long-eared owl nest (active 2010) approximately 325 meters from the proposed Hunter Creek CPS station. (LRB 03/17/11)

*Threatened and Endangered Plant Species:* There are no plant species listed, proposed, or candidate to the Endangered Species Act, or plants considered sensitive by the BLM, that are known to inhabit areas potentially influenced by the Proposed Action. The proposed and no-action alternatives would have no influence on populations or habitats of plants associated with the Endangered Species Act or BLM sensitive species and would have no influence on the status of applicable land health standards. (MET 4/12/11)

#### REFERENCES CITED

- Armstrong, Harley J. and David G. Wolny  
1989 Paleontological Resources of northwest Colorado: A Regional Analysis. Museum of Western Colorado, Grand Junction, Colorado.
- Berg, Caryn M., Michael J. Retter and Scott C. Phillips  
2007 Class III Cultural Resource Inventory of the Proposed Duke Energy land Acquisition, Williams Ryan Gulch Project, Rio Blanco County, Colorado. SWCA Environmental Consultants, Broomfield, Colorado. #08-127-04
- Bott, Tracey  
2004 Exxon-Mobil Corporation: Class III Cultural Resource Inventory for the Proposed Independence units T52X-29G and T51X-11G: Wells, Access and Pipelines, Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #04-54-37
- 2005 A Class III Cultural Resource Inventory for Exxon-Mobil's Piceance Creek Unit: Proposed T33X-29G2 and T62X-11G Well Developments in Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #05-54-09
- Brogan, John  
2006 Exxon-Mobil Corporation's Proposed Piceance Tight Gas project (Phase I) Class III Cultural Resource Inventory in Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #06-54-02
- Conner, Carl E.  
1998 Class III Cultural Resource inventory Report for Phase I of a Proposed 138kV Transmission Line in Piceance Creek Area of Rio Blanco County, Colorado for White River Electric Association. Grand River Institute, Grand Junction, Colorado. #98-11-02

Conner, Carl E., Kevin O'Hanlon and Barbara J. Davenport

- 2007 Class III Cultural Resource Inventory Report for the Proposed 345 Transmission Line in Rio Blanco County, Colorado for White River Electric Association. Grand River Institute, Grand Junction, Colorado. #07-11-08

Elkins, Melissa A.

- 2008 ExxonMobil Corporation: Class III Cultural Resource Inventory for the Proposed Hatch Gulch Pipeline, Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #08-54-27

Kintz, Kimberly

- 2009 ExxonMobil Corporation: A Class III Cultural Resources Inventory of Five Temporary Use-Areas Along the Proposed Hatch Gulch Pipeline in Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #09-54-37

Redman, Kim, Susan M. Chandler, Alan D. Reed, David Guilfoyle, James Firor and Jonathan C. Horn

- 2004 Class III Cultural Resource inventory of the Colorado Segments of the Planned Entrega Gas Pipeline Rio Blanco, Moffat, Larimer and Weld Counties, Colorado. Alpine Archaeological Consultants,, Inc., Montrose, Colorado. #05-83-09

Reed, Charles A.

- 2007 Exxon-Mobil Corporation's Proposed Piceance Development Project Class III Cultural Resource Inventory, Addendum 1 to: Exxon-Mobil Corporation's Proposed Piceance Tight-Gas project (Phase I) Class III Cultural Resource inventory in Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado. #07-54-04

Tweto, Ogden

- 1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior, Reston, Virginia.

#### MITIGATION:

1. The holder is responsible for informing all persons who are associated with the project 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 uncovered during any project or construction activities, the holder is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the holder as to:

- whether the materials appear eligible for the National Register of Historic Places

- the mitigation measures the holder will likely have to undertake before the site can be used (assuming in situ preservation is not necessary)
- a timeframe for the AO to complete an expedited review under 36 CFR 800-11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

If the holder 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 holder will be responsible for mitigation cost. 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 holder will then be allowed to resume construction.

2. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, 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), 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.

3. Hunter 1 & 2 CPS locations: All trenching or drilling for the anode beds must be fully confined to the existing disturbed area only.

4. The holder is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing paleontological sites, or for collecting vertebrate fossils. If fossil materials are uncovered during any project or construction activities, the holder is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the holder as to:

- whether the materials appear to be of noteworthy scientific interest
- the mitigation measures the holder will likely have to undertake before the site can be used (assuming in situ preservation is not feasible)

If the holder 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 holder will be responsible for mitigation cost. 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 holder will then be allowed to resume construction.

5. If it becomes necessary to excavate a trench rather than a bore hole for the anode bed a into the underlying rock formation a paleontological monitor shall be required for all such trenching.

6. Installation of the Hunter Creek CPS station will take place after April 30 to avoid the unnecessary disruption in mule deer severe winter ranges.

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 as well as the stipulations attached to the original grants.

NAME OF PREPARER: Linda Jones

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

DATE: 5/12/2011

ATTACHMENTS:

Exhibit A - Area: Exxon Cathodic Protection – Four Sites (Area Map)

Exhibit A-1: Exxon Cathodic Protection – Hatch Gulch Site

Exhibit A-2: Exxon Cathodic Protection – T62X-11G Site

Exhibit A-3: Exxon Cathodic Protection – Hunter Creek Site 1 & 2

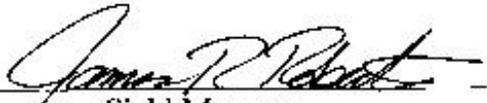
Exhibit A: Exxon CPS Sites within Piceance Development Project CO-110-2005-219-EA

## CONCLUSION

DOI-BLM-CO-110-2011-0055-DNA

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:

  
FR Field Manager

DATE SIGNED: 5/12/2011

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.









EXXON CATHODIC PROTECTION - HUNTER CREEK SITE 1&2

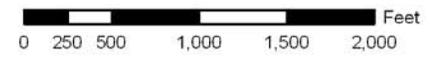


EXHIBIT A -3

DOI-BLM-CO-10020110055-EA  
Sixth Principal Meridian  
T.2S., R.97W., sec 28



- Anodes
- JunctionBox
- Cabel
- Rectifier
- Cable
- ROW
- JunctionBox
- ROW
- ROW
- PLSS\_Townships\_GCDB2008
- PLSS\_Sections\_GCDB2008
- County
- State



2011 LU

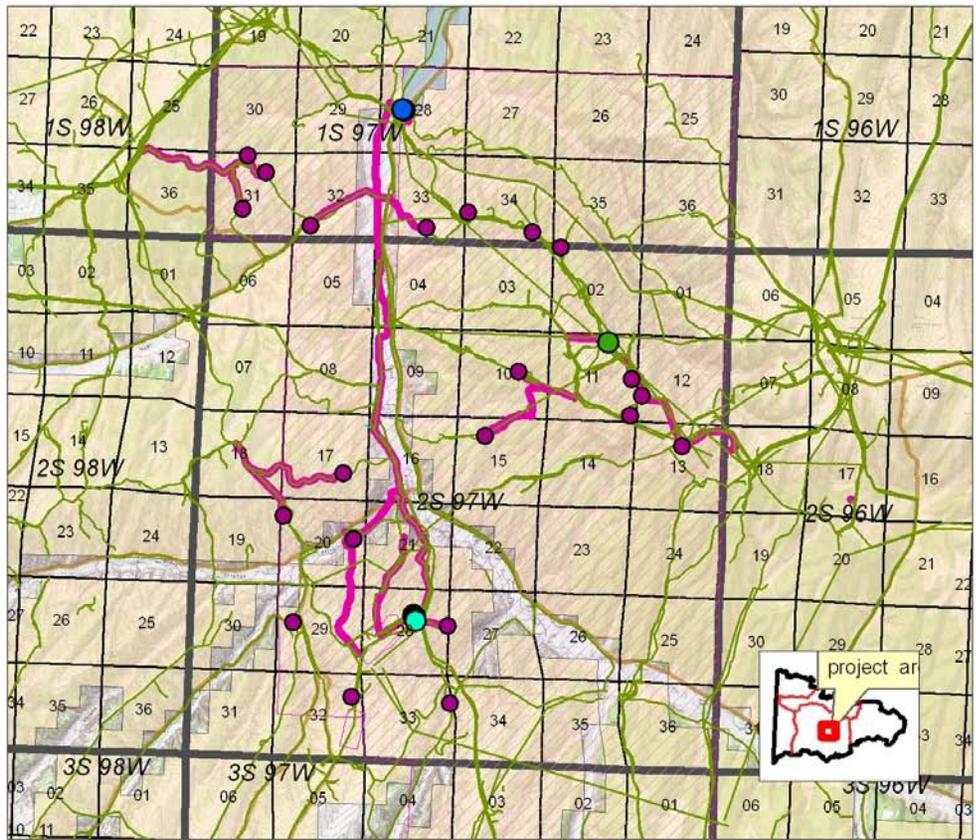
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EXXON CPS SITES WITHIN  
PICEANCE DEVELOPMENT PROJECT CO-110-2005-219-EA



EXHIBIT A



**LEASE\_NUM**

- CO-110-05-219-EA
- PLSS\_Townships\_GCDB2008
- PLSS\_Sections\_GCDB2008
- County
- State
- BLM
- CDW
- County
- FOR
- NPS
- PRI
- STA

**LEASE\_NUM**

- CO-110-05-219-EA

**Projects: line**

- <all other values>

**LEASE\_NUM**

- CO-110-05-219-EA
- Anodes
- Anodes
- Anodes

**Scale:** 0 0.5 1 2 3 4 Miles

**North Arrow:** N, S, E, W

**Inset Map:** project area