

**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-110-2013-0014-DNA

**CASEFILE/PROJECT NUMBER:** COC-008313  
COC75935 (RG 41-16-397 disposal well)  
Amend COC73833 (Access Road)

**PROJECT NAME:** WPX Federal RG 41-16-397 injection well conversion

**LEGAL DESCRIPTION:** T3S, R97W, Sec.16, NWNE

**APPLICANT:** WPX Energy Rocky Mountain LLC (WPX)

**ISSUES AND CONCERNS:**

**DESCRIPTION OF PROPOSED ACTION:** WPX proposes to convert the existing Ryan Gulch (RG) 41-16-397 well into a salt water disposal well (see Figure 1). WPX anticipates injection rates at the wellhead would be from 500bbls/day at 100psi up to 8,500bbls/day at 3,593psi. No additional surface disturbance would be required on the well pad to accommodate the injection well conversion. Until sustained injectivity rates can be confirmed for the injection well, WPX would be trucking produced water to the well pad. Six to 12 water trucks per day would be expected to be offloaded at the well pad. Water would be trucked from wells on and off unit, so a right-of-way (ROW) will be required for the disposal well and the access road. Once WPX confirms sustained injectivity for one year, they will then seek authorization to install a pipeline to the RG 41-16-397 well.

**Decision to be Made:** The BLM will decide whether or not to permit the conversion of the existing RG 41-16-397 well into an injection well, and if so, under what conditions.

**PLAN 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:** 2-5

Decision Language: "Make federal oil and gas resources available for leasing and development in a manner that provides reasonable protection for other resource values."

REVIEW OF EXISTING NATIONAL ENVIRONMENTAL POLICY ACT (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: June 1996

Name of Document: [CO-110-2009-107-EA](#)

Date Approved: 6/19/2009

NEPA ADEQUACY CRITERIA:

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? 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? If there are differences, can you explain why they are not substantial?

Yes. The Proposed Action is similar in location and nature to what has been previously analyzed. The Proposed Action is to convert the existing Federal 41-16-397 gas well into an injection well. The DOI-BLM-CO-110-2009-0107-Environmental Assessment (EA) analyzed the surface disturbance required to construct the well pad, and drill and maintain the existing well. The proposed conversion is simply a down-hole procedure that does not require any additional surface disturbance.

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

Two alternatives (Proposed Action and No Action Alternative) were analyzed in the DOI-BLM-CO-110-2009-0107-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?

No new information was made available during this DNA that was not available at the time the DOI-BLM-CO-110-2009-0107-EA was finalized on 6/19/2009.

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?

Yes. Direct, indirect, and cumulative impacts related to construction, drilling, and maintenance of the existing well were analyzed in the DOI-BLM-CO-110-2009-0107-EA. No new impacts that were not fully mitigated in the DOI-BLM-CO-110-2009-0107-EA were identified in this DNA process.

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

Yes. Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on 11/6/2012. External scoping was conducted by posting this project on the WRFO's on-line NEPA register on 11/6/2012.

**INTERDISCIPLINARY REVIEW:**

The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on 11/6/2012. A complete list of resource specialists who participated in this review is available upon request from the White River Field Office. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

<b>Name</b>	<b>Title</b>	<b>Resource</b>	<b>Date</b>
Michael Selle	Archaeologist	Cultural Resources, Native American Religious Concerns	11/20/2012
Laura Dixon	Wildlife Biologist	Special Status Wildlife Species	11/08/2012
Zoe Miller	Ecologist	Special Status Plant Species	11/20/2012

**REMARKS:**

*Cultural Resources:* The proposed injection well conversion well pad has been inventoried at the Class III (100 percent pedestrian) level (Baer et al. 2009 compliance dated 11/25/2009) with no cultural resources located in the well pad area. The closest known cultural resource is an Isolated Find, which is not generally considered National Register of Historic Places (NRHP) eligible. The Isolated Find is located approximately 351 feet (98 meters) away from the well and is fairly well visually masked from the well by vegetation. Since no new ground disturbance is required

for the conversion to an injection well, there are no new impacts to cultural resources anticipated from this action.

*Native American Religious Concerns:* No Native American Religious Concerns are known in the area, and 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.

*Threatened and Endangered Wildlife Species:* There are no threatened or endangered wildlife that species that are known to inhabit or derive important use from the project area. The proposed water truck route to the existing well pad is through approximately 2.3 miles of habitat classified by Colorado Parks and Wildlife as big game critical winter range. Six to twelve truck trips a day has potential to disturb local wildlife populations. However, re-routing the trucks to avoid big game critical winter range has the potential to pose a greater disturbance to wildlife population by increasing the area affected. Activities associated with the conversion of the well to an injection well are not expected to have any effect on nesting raptors. However, increased truck traffic as a result of the Proposed Action has the potential to disrupt nesting raptors during the nesting season (April through August). There is no additional surface disturbance associated with the Proposed Action and therefore, all additional wildlife related issues and concerns were adequately addressed in the original EA (DOI-BLM-CO-110-2009-107-EA).

*Threatened and Endangered Plant Species:* There are no special status plant species issues or concerns associated with the Proposed Action.

#### REFERENCES CITED:

Baer, Sarah, Karen Reed, Anthony Lopez, Scott Phillips, Nicole Hurlburt, Matthew Bandy, John Kennedy, Michelle Delmas, Ashley Fife, Ryan Byerly, Cynthia Manseau, and Scott Slessman.  
2009 A Class III Cultural Resource Inventory for the Williams Gulch Unit, Rio Blanco County, Colorado. SWCA Environmental Consultants, Broomfield, Colorado.

#### MITIGATION:

The following applicable mitigation from DOI-BLM-CO-110-2009-107-EA has been carried forward:

1. All access roads will be maintained according to BLM Manual Section 9113 standards for road shape and drainage features at all times during construction, drilling and production.
2. All vehicles will abide by company or public speed restrictions during all activities. If water is used as a dust suppressant, there should be no traces of oil or solvents in the water and it should be properly permitted for this use by the State of Colorado. Only water needed for abating dust should be applied; dust abatement should not be used as a water disposal option under any circumstances.

3. If erosion features such as riling, gullying, piping and mass wasting occur at any time in the future on disturbed surfaces, the erosion features will be addressed immediately after observation by contacting the Authorized Officer (AO) and submitting a plan to assure successful soil stabilization with Best Management Practices (BMP's) to address the erosion problems.

4. Onsite sewage treatment needs to be approved by the BLM via Sundry Notice by the AO. All sewage should be disposed of off-site as per the Surface Use Plan.

5. Provide for erosion-resistant surface drainage by adding necessary drainage facilities and armoring prior to fall rain or snow. When erosion is anticipated, sediment barriers shall be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site. In addition, straining or filtration mechanisms may also contribute to sediment removal from runoff.

6. Locate culverts or drainage dips in such a manner as to avoid discharge onto unstable terrain such as headwalls or slumps. Provide adequate spacing to avoid accumulation of water in ditches or road surfaces. Install culverts with adequate armoring of inlet and outlet. Patrol areas susceptible to road or watershed damage during periods of high runoff.

7. Keep road inlet and outlet ditches, catchbasins, and culverts free of obstructions, particularly before and during spring runoff. Routine machine-cleaning of ditches should be kept to a minimum during wet weather. Leave the disturbed area in a condition that provides drainage with no additional maintenance.

8. Culverts and waterbars should be installed according to 9113 standards and sized for the 10-year storm event with no static head and to pass a 25-year event without failing.

9. The designated NRS will be notified 24 hours prior to beginning all reclamation activities associated with this project via email or by phone. Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, constructing exclosures (i.e., fences) to exclude livestock from reclaimed areas.

10. The operator will be required to monitor the project area for the life of the project and eradicate/control all noxious and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.

11. The operator 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 operator 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 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 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 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 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 operator will then be allowed to resume construction.

12. 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.

13. The operator 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 fossils. If fossil materials are uncovered during any project or construction activities, the operator 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 operator as to:

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

14. All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed above ground shall be painted Munsell Soil Color Chart Juniper Green, or equivalent within six months of installation.

15. In the event of an accidental ignition or natural ignition resulting in a wildfire within the project area, the contractor or a representative will contact Craig Interagency Fire Dispatch at 970-826-5037. The dispatch center will notify BLM fire personnel in order for local fire management to evaluate the situation for the safety of all crews in the area and determine the appropriate management action (AMR). The reporting party will inform the dispatch center of fire location, size, status, smoke color, aspect, fuel type and contact information. The reporting party, or a representative of, should remain nearby in order to make contact with incoming fire resources to expedite actions taken towards AMR. Accidental ignitions caused by welding, cutting, grinding, etc. will be suppressed by the applicant only if employee safety is not endangered and if the fire can be safely contained using hand tools and portable hand pumps. The applicant and contractors will not engage in any fire suppression activities outside the approved project area. If chemical fire extinguishers are used the applicant must notify incoming fire resources on extinguisher type and the location of use. If a natural ignition occurs within the approved project area, the fire may be initially contained by the applicant only if employee safety

is not endangered. The use of heavy equipment for fire suppression is prohibited, unless authorized by the Field Office Manager.

COMPLIANCE PLAN: 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.

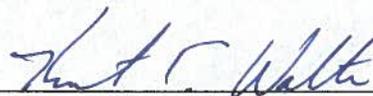
NAME OF PREPARER: Christina Ashley

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

CONCLUSION

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

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

DATE SIGNED:

12/04/2012

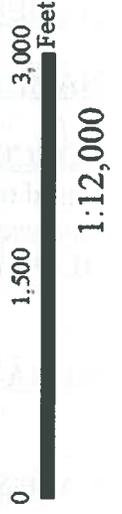
ATTACHMENTS:

Figure 1. Project Area Map

Note: The signed Conclusion in this DNA Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Figure 1. Project Area Map

# WPX Proposed RGU 41-16-397 Injection Well Conversion



**Data Disclaimer**  
Although the data presented within this map, and the map itself, have been processed using software on computers of BLM, no warranty, expressed or implied, is made by BLM regarding the use of this map or the data represented, nor does the fact of distribution constitute or imply any such warranty.

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

**DECISION RECORD**

**PROJECT NAME:** WPX Federal RG 41-16-397 injection well conversion

**DETERMINATION OF NEPA ADEQUACY NUMBER:** DOI-BLM-CO-110-2013-0014-DNA

**DECISION**

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-110-2013-0014-DNA, authorizing the conversion of the existing RG 41-16-397 well into an injection well, with the following conditions.

**Mitigation Measures**

1. All access roads will be maintained according to BLM Manual Section 9113 standards for road shape and drainage features at all times during construction, drilling and production.
2. All vehicles will abide by company or public speed restrictions during all activities. If water is used as a dust suppressant, there should be no traces of oil or solvents in the water and it should be properly permitted for this use by the State of Colorado. Only water needed for abating dust should be applied; dust abatement should not be used as a water disposal option under any circumstances.
3. If erosion features such as riling, gulying, piping and mass wasting occur at any time in the future on disturbed surfaces, the erosion features will be addressed immediately after observation by contacting the Authorized Officer (AO) and submitting a plan to assure successful soil stabilization with Best Management Practices (BMP's) to address the erosion problems.
4. Onsite sewage treatment needs to be approved by the BLM via Sundry Notice by the AO. All sewage should be disposed of off-site as per the Surface Use Plan.
5. Provide for erosion-resistant surface drainage by adding necessary drainage facilities and armoring prior to fall rain or snow. When erosion is anticipated, sediment barriers shall be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site. In addition, straining or filtration mechanisms may also contribute to sediment removal from runoff.
6. Locate culverts or drainage dips in such a manner as to avoid discharge onto unstable terrain such as headwalls or slumps. Provide adequate spacing to avoid accumulation of water in ditches

or road surfaces. Install culverts with adequate armoring of inlet and outlet. Patrol areas susceptible to road or watershed damage during periods of high runoff.

7. Keep road inlet and outlet ditches, catchbasins, and culverts free of obstructions, particularly before and during spring runoff. Routine machine-cleaning of ditches should be kept to a minimum during wet weather. Leave the disturbed area in a condition that provides drainage with no additional maintenance.

8. Culverts and waterbars should be installed according to 9113 standards and sized for the 10-year storm event with no static head and to pass a 25-year event without failing.

9. The designated NRS will be notified 24 hours prior to beginning all reclamation activities associated with this project via email or by phone. Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, constructing exclosures (i.e., fences) to exclude livestock from reclaimed areas.

10. The operator will be required to monitor the project area for the life of the project and eradicate/control all noxious and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.

11. The operator 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 operator 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 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 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 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 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 operator will then be allowed to resume construction.

12. 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.

13. The operator 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 fossils. If fossil materials are uncovered during any project or construction activities, the operator 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 operator as to:

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

14. All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed above ground shall be painted Munsell Soil Color Chart Juniper Green, or equivalent within six months of installation.

15. In the event of an accidental ignition or natural ignition resulting in a wildfire within the project area, the contractor or a representative will contact Craig Interagency Fire Dispatch at 970-826-5037. The dispatch center will notify BLM fire personnel in order for local fire management to evaluate the situation for the safety of all crews in the area and determine the appropriate management action (AMR). The reporting party will inform the dispatch center of fire location, size, status, smoke color, aspect, fuel type and contact information. The reporting party, or a representative of, should remain nearby in order to make contact with incoming fire resources to expedite actions taken towards AMR. Accidental ignitions caused by welding, cutting, grinding, etc. will be suppressed by the applicant only if employee safety is not endangered and if the fire can be safely contained using hand tools and portable hand pumps. The applicant and contractors will not engage in any fire suppression activities outside the approved project area. If chemical fire extinguishers are used the applicant must notify incoming fire resources on extinguisher type and the location of use. If a natural ignition occurs within the approved project area, the fire may be initially contained by the applicant only if employee safety is not endangered. The use of heavy equipment for fire suppression is prohibited, unless authorized by the Field Office Manager.

#### **COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN**

This decision is in compliance with State of Colorado oil and gas rules, the Endangered Species Act, and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

#### **PUBLIC INVOLVEMENT**

Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on 11/6/2012. External scoping was conducted by posting this project on the WRFO's on-line National Environmental Policy Act (NEPA) register on 11/6/2012. No comments or inquiries were received as of 12/3/2012.

**RATIONALE**

Allowing for the conversion of the existing Federal 41-16-397 gas well into an injection well would allow WPX to determine if sustained injectivity of produced waters from on and off the Ryan Gulch Unit is possible. Substantially less truck traffic is anticipated in the long term if sustained injectivity is proven after one year of operations and WPX is later able to connect pipelines to the injection well site.

**ADMINISTRATIVE REMEDIES**

**State Director Review**

Under regulations addressed in 43 CFR 3165.3(b), any adversely affected party that contests a decision of the Authorized Officer may request an administrative review, before the State Director, either with or without oral presentation. Such request, including all supporting documentation, shall be filed in writing with the BLM Colorado State Office at 2850 Youngfield Street, Lakewood, Colorado 80215 within 20 business days of the date such decision was received or considered to have been received. Upon request and showing of good cause, an extension may be granted by the State Director. Such review shall include all factors or circumstances relevant to the particular case.

**Appeal**

Any party who is adversely affected by the decision of the State Director after State Director review, under 43 CFR 3165.3(b), of a decision may appeal that decision to the Interior Board of Land Appeals pursuant to the regulations set out in 43 CRF Part 4.

**SIGNATURE OF AUTHORIZED OFFICIAL:**



Field Manager

**DATE SIGNED:**

12/04/2012