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-110-2012-0120-DNA

CASEFILE/PROJECT NUMBER: COC-47675X

PROJECT NAME: Conversion of the Levison 17 Producing Well to Water Alternating Gas (WAG) Injection Well (with associated pipelines).

LEGAL DESCRIPTION: T2N R102W Section 26 NENW

APPLICANT: Chevron USA, INC

ISSUES AND CONCERNS: None identified.

DESCRIPTION OF PROPOSED ACTION:
Chevron, as operator of the Rangely Weber Sand Unit (RWSU) is planning to convert the Levison 17 producing well to a water alternating gas (WAG) injection well. This conversion will include the installation of two new pipelines (Figure 1). One 4 inch Sch. 40 (0.216 wall) coated and wrapped CS pipeline for CO_2 injection rated at 2,200 psi and one 4 inch 2,500 psi fiber glass pipeline for H2O injection. The pipelines will be installed in the same trench with an approximate length of 1,212 feet. The existing production flowline will be disconnected, flushed with fresh water, and cap/plugged on both ends. The two new lines will be laid in the same trench a minimum of 10 foot offset from the existing flowline. There will be approximately 1.1 acres of new disturbance on Bureau of Land Management (BLM). The projected start date is spring 2013.

Design Features:
This project will abide by the Conditions of Approval (COAs) that are associated with Chevron's field wide environmental assessment DOI-BLM-CO-110-2011-0151-EA. The plan for the pipeline reclamation is attached (Attachment 1).

Decision to be Made:
The BLM will decide whether or not to approve the conversion of the Levison 17 well from producing to water alternating gas injection well and the two new associated pipelines.

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 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: DOI-BLM-CO-110-2011-151-EA

Date Approved: 11/22/2011

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?
   The anticipated impacts that would result from replacing the pipelines and the conversion of the well are similar to the anticipated impacts that were addressed and mitigated in the existing NEPA document (DOI-BLM-CO-110-2011-151-EA). The existing NEPA document analyzed pipeline replacement and removal as well as well pad facility construction. Furthermore, the proposed pipeline replacements are in the analysis area that was reviewed in DOI-BLM-CO-110-2011-151-EA.

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 DOI-BLM-CO-110-2011-151-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?

Review by BLM White River Field Office (WRFO) specialists in document DOI-BLM-CO-110-2011-151-EA did not indicate recent endangered species listings and no updates/changes have been made to BLM's sensitive species list that would be affected by the 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?
   It is assumed that all direct, indirect, and cumulative effects associated with the Proposed Action are similar in scope, intensity, duration and spatial extent as the direct, indirect, and cumulative effects that were addressed in DOI-BLM-CO-110-2011-151-EA. All anticipated direct, indirect, and cumulative impacts associated with the Proposed Action were reviewed and mitigated in DOI-BLM-CO-110-2011-151-EA. There is approximately 1.1 acres of disturbance in this DNA which is less than one percent of the existing NEPA document. The cumulative percentage of disturbance from the other DNAs tiered to the existing NEPA document is 4.5 percent of what was analyzed in the EA.

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?
   The public involvement with this project was done by posting it on a list of pending NEPA documents on the BLM WRFO's White River NEPA Register on July 24, 2012. As of May 6, 2013, no comments or inquiries have been received.

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on July 24, 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.

Name	Title	Resource	Date
Michael Selle	Archaeologist	Paleontological Resources	11/1/2012
Michael Wolfe	Archaeologist	Cultural Resources, Native American Religious Concerns	4/2/2013
Laura Dixon	Wildlife Biologist	Special Status Wildlife Species	3/8/2013
Baili Foster	Biological Technician – Plants	Special Status Plant Species	3/8/2013

REMARKS:

Cultural Resources: There are no known cultural resources for any of the proposed pipeline projects. The project area has been inventoried at the Class III level (Conner 2012; Conner 2013) and no cultural resources were identified within the proposed project area.

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.

Paleontological Resources: The propose pipeline is located in an area generally mapped as the Mancos Shale (Tweto 1979) which the BLM, White River Field Office (WRFO) has classified as a Potential Fossil Yield Classification (PFYC) 3 Formation. Meaning it has not been shown to produce scientifically noteworthy fossil resources at this time (c.f. Armstrong and Wolny 1989). The Authorized Officer (AO) may require spot checking of excavations to see if fossils might be present.

Threatened and Endangered Wildlife Species: The Rangely Oil Field is largely encompassed by white-tailed prairie dogs, a BLM-sensitive species. White-tailed prairie dogs and their burrow systems provide an important food and cover source for several other species including burrowing owl and ferruginous hawk (both BLM-sensitive species) and the federally endangered black-footed ferret. While ferrets have been released in Colorado and Utah (release sites ~13 miles and ~16 miles, respectively and separated from project area by small, discontinuous prairie dog colonies), there have been no documented ferret sightings in the Rangely Oil Field. Burrowing owls are uncommon, but do occur at low densities throughout the project area. The nearest known nest (active in 2009) is approximately 0.67 miles from the project area. Brewer's sparrow, another BLM-sensitive species, is common in sagebrush habitats throughout the oil field.

Although new disturbance associated with the Proposed Action is small (1.1 acre) there is potential for construction activities to occur during the prairie dog reproductive period potentially resulting in impacts to prairie dogs, ferrets and burrowing owls. Carrying forward the timing limitation addressed in the original EA (DOI-BLM-CO-110-2011-0151-EA) regarding prairie dog reproductive period will minimize impacts.

Threatened and Endangered Plant Species: There were no special status plant concerns in the original EA (DOI-BLM-CO-110-2011-0151-EA) and the same analysis is sufficient for this action. Therefore, there are no concerns associated with the Proposed Action.

MITIGATION:

The following applicable mitigation from DOI-BLM-CO-110-2011-0151-EA has been carried forward:

1. The operator shall employ dust suppression techniques (i.e., freshwater use) whenever there is a visible dust trail behind service vehicles. Any technique other than the use of freshwater as a dust suppressant on BLM lands will require prior written approval from BLM.

2. Chevron will use the Master Surface Plan submitted with the Proposed Action for achieving interim and final reclamation on existing wells when any new disturbance or infrastructure is planned.

3. If salt is observed on the surface of soils during or after reclamation activities Chevron will notify the Natural Resource Specialist and a plan will be developed with approval of

the BLM, that may include the administration of soil amendments, the reapplication of soil preparation, seeding, and stabilization measures to achieve successful reclamation.

4. If surface sources are used for freshwater, water hauling trucks must use backflow preventers to avoid contamination of surface waters.

5. The WRFO recommends for these pipeline replacements to use Seed Mix #8 below. The operator will submit proposed seed mixes to BLM via Sundry Notice for review and approval prior to applying the seed.

SEED MIX #8 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs. PLS/Acre**
Galleta Grass	Pleuraphis jamesii	Viva florets	3
Indian Ricegrass	Achnatherum hymenoides	Rimrock	3
Bottlebrush squirreltail	Elymus elymoides	Toe Jam Creek	2.5
Western wheatgrass	Pascopyrum smithii	Rosana	4
Scarlet Globemallow	Sphaeralcea coccinea		0.25
Annual sunflower	Helianthus annus		2.5
Mat saltbush	Atriplex confertifolia		2

6. There will be no earthwork or activities allowed from April 15 – July 15 (prairie dog reproductive period) in those instances involving occupied prairie dog habitat. Occupation will be determined through surveys conducted by BLM wildlife staff.

7. Burrowing owl surveys will be required prior to construction initiation if work is planned to take place during the breeding season (April 15 – August 15). Should an active nest be located, no earthwork or activities will be allowed from April 15 – August 15 (or until young have fledged) within ½ mile of any occupied burrowing owl nest location. There will be no surface occupancy allowed within ¼ mile of known nest locations.

8. There will be no earthwork or vegetation removal allowed from May 15 – July 15 in those instances involving new construction (i.e., new well pads or new cross-country pipelines). All sundries will be analyzed on a case-by-case basis. At that time it will be determined by BLM wildlife staff if it is necessary to impose the above timing limitation based on the degree of impact the action presents to migratory birds.
9. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the Authorized Officer (AO). Chevron will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless

previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. Chevron, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

10. Pursuant to 43 CFR 10.4(g), Chevron must notify the AO, by telephone and 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), Chevron must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.

11. Chevron is responsible for informing all persons who are associated with the projects 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, Chevron must immediately contact the appropriate BLM representative.

12. If any paleontological resources are discovered as a result of operations under this authorization, Chevron or any of their agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 working days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

13. The permittee/applicant is responsible for informing all persons who are associated with the allotment/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 permittee/applicant must immediately contact the appropriate BLM representative. The AO may require occasional spot checking of trenching operations to inspect for possible presence of fossil resources.

14. The AO may require occasional spot checking of trenching operations to inspect for possible presence of fossil resources.

15. All lessees and/or operators and right-of-way holders shall comply with all federal, state and/or local laws, rules, and regulations, including but not limited to onshore orders and

notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment.

16. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

17. As a reasonable and prudent lessee/operator in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.

18. As a reasonable and prudent lessees/operator and/or right-of-way holder in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the lessee/operator or right-of-way holder fails, refuses or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground) and soils at the lessee/operator's expense. Such action will not relieve the lessee/operator of any liability or responsibility.

19. With the acceptance of this authorization, the commencement of operations under this authorization, or within thirty calendar days from the issuance of this authorization, whichever occurs first, and during the life of the pipeline, the right-of-way holder and the lessee/operator, and through the right-of-way holder and lessee/operator, its agents, employees, subcontractors, successors and assigns, stipulate and agree to indemnify, defend and hold harmless the United States Government, its agencies, and employees from all liability associated with the emission or release of substances that pose a risk of harm to human health or the environment.

20. Any livestock control facilities and/or rangeland improvements impacted during this operation will be replaced or repaired to their prior condition.

21. To avoid impacts to existing realty rights-of-way, Chevron would need to coordinate with right-of-way holders prior to any construction activity.

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.

REFERENCES:

Armstrong, Harley J., and David G. Wolny
1989 Paleontological Resources of Northwest Colorado: A Regional Analysis. Museum of Western Colorado, Grand Junction Colorado.

Conner, Carl E
2012 Class III Cultural Resource Inventory for 23 Proposed Pipelines Short Pipelines in Rio Blanco County, Colorado for Chevron North America Upstream.[BLM-WRFO CRIR #12-11-34, RB.LM.NR1304, GRI No. 2012-80]. Manuscript is on file at the BLM-White River Field Office, Meeker, Colorado.

2013 Class III Cultural Resources Inventory for the Levison 17 water injection line (1212') and the Gray A 22X 4" Flowline (1712') in Rio Blanco County, Colorado for Chevron U.S.A., Inc. [BLM-WRFO CRIR #13-11-02, RB.LM.NR2343;GRI Project No. 2013-15]. Manuscript is on file at the BLM-White River Field Office, Meeker, Colorado.

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

NAME OF PREPARER: Ryan Snyder

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: Kent E. Walter
Field Manager

DATE SIGNED: 05/16/13

ATTACHMENTS:
Figure 1: Map of the Proposed Action.
Attachment 1: Surface Reclamation Plan for Pipeline Corridors.

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.

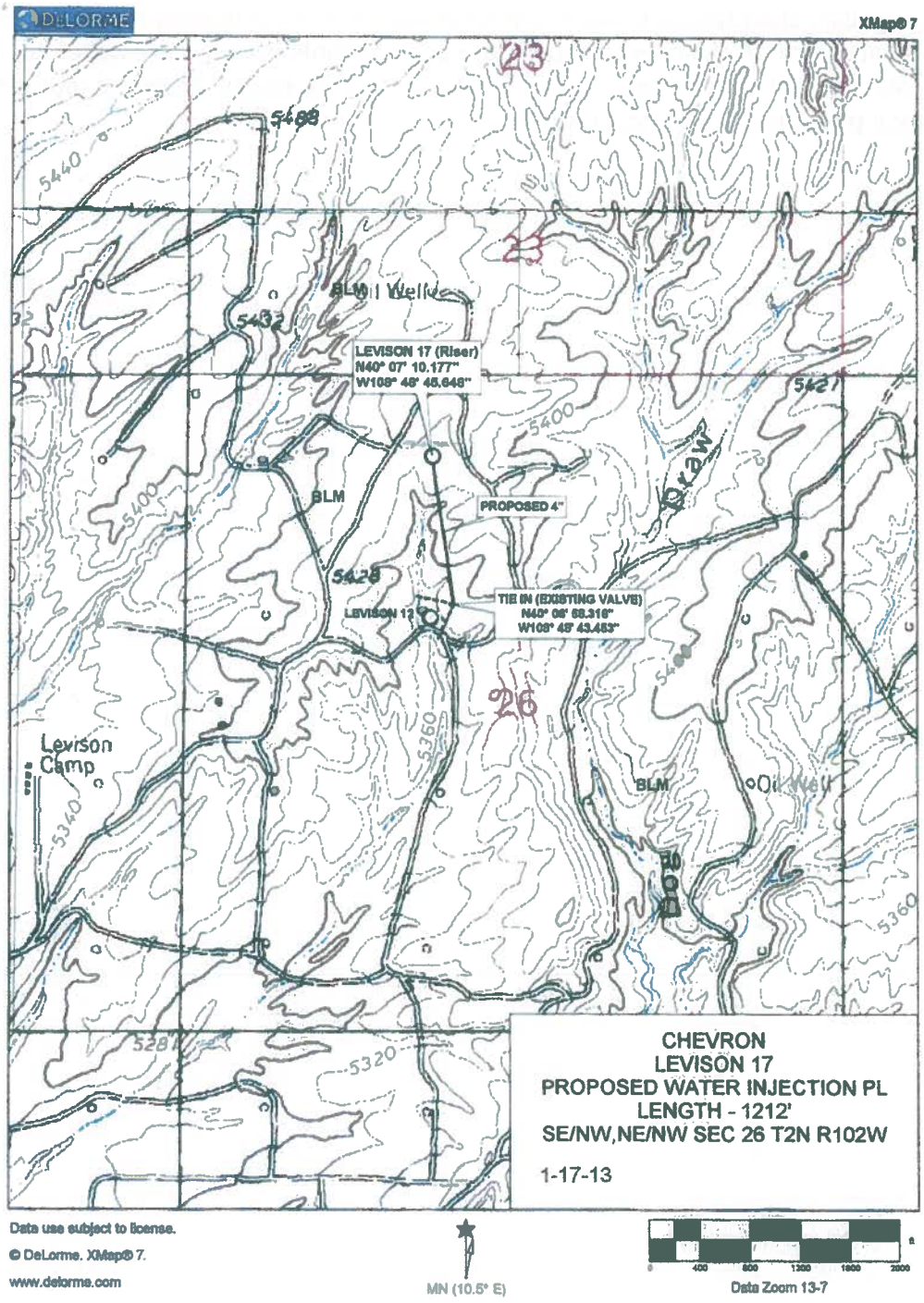

Figure 1: Map showing the location of the well conversion and the new pipeline installation.

Attachment 1 – Surface Reclamation Plan

Surface Use Plan of Operations
Plan for Surface Reclamation of

PIPELINE RIGHT-OF-WAYS, ACCESS ROADS, AND WELL PADS

I. Reclamation Objectives:

The long-term objective of final reclamation is to return the land to a condition approximating that which existed prior to disturbance. This includes restoration of the landform, hydrologic systems, visual resources, wildlife habitats, and establishment of desired vegetative community. To ensure that the long-term objective will be reached through human and natural processes, actions will be taken to ensure standards are met for site stability, visual quality, hydrological functioning, and vegetative productivity.

II. Reclamation Performance Standards

The following reclamation performance standards will be met:

Reclamation – Includes disturbed areas where the original landform and a natural vegetative community have been restored and it is anticipated the site will not be redisturbed for future development.

- Reclamation will be judged successful when the BLM Authorized Officer determines that:
  - The original contour, or one which blends with the surrounding landform, has been restored for all disturbed areas including well pads, production facilities, roads, pipelines, and utility corridors.
  - A self-sustaining, vigorous, diverse, desired plant community is established on the site, with a density sufficient to control erosion and invasion by non-native plants and to reestablish wildlife habitat or forage production. At a minimum, the established plant community will consist of species included in the seed mix and/or desirable species occurring in the surrounding natural vegetation.
  - In agricultural areas, irrigation systems and soil conditions are reestablished in such a way as to ensure successful cultivation and harvesting of crops.
  - Erosion features are equal to or less than surrounding area and erosion control is sufficient so that water naturally infiltrates into the soil and gullying, headcutting, slumping, and deep or excessive rills (greater than 3 inches) are not observed.
  - The site is free of State- or county-listed noxious weeds, oil field debris and equipment, and contaminated soil. Invasive, non-native, and undesirable weeds are controlled.

III. Reclamation Actions (Minimum)

The following minimum reclamation actions will be taken to ensure that the reclamation objectives and standards are met. It may be necessary to take additional reclamation actions beyond the minimum in order to achieve the Reclamation Standards.

Reclamation - General

Notification:

- The BLM WRFO *designated Natural Resource Specialist* be notified at least 24 hours prior to commencement of any reclamation operations.

Vegetation Clearing:

- Grass, forbs, and small woody vegetation, such as sagebrush will be excavated as the topsoil is removed.
- Large woody vegetation will be stripped and stored separately and respread evenly on the site following topsoil respreading.

Topsoil Management:

- Operations will disturb the minimum amount of surface area necessary to conduct safe and efficient operations.
- Topsoil depth is defined as the top layer of soil that contains 80 percent of the roots. In areas to be heavily disturbed, the top six inches of soil material, will be stripped and stockpiled. Topsoil will be clearly segregated and stored separately from subsoils.
- On sites where there is not at least an average of six inches of topsoil across the site available for stockpiling, soil amendments will be used to augment the available topsoil and improve plant germination and growth. Soil amendments will be determined as part of the reclamation pre-assessment, and agreed to by both the operator and the BLM prior to disturbing the site.
- Earthwork for reclamation will be completed within six months of surface work unless a delay is approved *in writing* by the BLM authorized officer.
- Salvaging and spreading topsoil will not be performed when the ground or topsoil is frozen or too wet to adequately support construction equipment or so dry that dust clouds greater than 30 feet tall are created. If such equipment creates ruts in excess of three inches deep, the soil will be deemed too wet.
- No major depressions will be left that would trap water and cause ponding unless the intended purpose is to trap runoff and sediment.

Seeding:

- Seedbed Preparation: Initial seedbed preparation will consist of recontouring to the appropriate interim or final reclamation standard. All compacted areas to be seeded will be ripped to a minimum depth of 18 inches with a minimum furrow spacing of 2 feet, followed by recontouring the surface and then evenly spreading the stockpiled topsoil. Prior to seeding, the seedbed will be scarified to a depth of no less than four to six inches. If the site is to be broadcast seeded, the surface will be left rough enough to trap seed and snow, control erosion, and increase water infiltration.

- If broadcast seeding is to be used and is delayed, final seedbed preparation will consist of contour cultivating to a depth of 4 to 6 inches within 24 hours prior to seeding, dozer tracking, or other imprinting in order to break the soil crust and create seed germination micro-sites.
- Seed Application. Seeding will be conducted no more than two weeks following completion of final seedbed preparation. A certified weed-free seed mix designed by the BLM (shown below) to meet reclamation standards will be used on all disturbed surfaces, including pipelines and road cut and fill slopes:
-

• SEED MIX #1 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs PLS/Acre**
Western wheatgrass	Pascopyrum smithii	Rosana	4.5
Thickspike wheatgrass	Elymus lanceolatus	Critana	3.5
Bottlebrush squirreltail	Elymus elymoides	Toe Jam Creek	3
Scarlet Globemallow	Sphaeralcea coccinea		0.5
Sulphur flower	Eriogonum umbellatum		1.5
Winterfat	Krascheninnikovia lanata		0.5

SEED MIX #3 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs PLS/Acre**
Western wheatgrass	Pascopyrum smithii	Rosana	4
Bluebunch wheatgrass	Pseudoroegneria spicata	Whitmar	3.5
Indian ricegrass	Achnatherum hymenoides	Rimrock	3
Needle and Thread	Hesperostipa comata		2.5
Lewis Flax	Linum Lewisii	Maple grove	1
Scarlet Globemallow	Sphaeralcea coccinea		0.5

SEED MIX #8 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs PLS/Acre**
Galleta Grass	Pleuraphis jamesii	Viva florets	3
Indian Ricegrass	Achnatherum hymenoides	Rimrock	3
Bottlebrush squirreltail	Elymus elymoides	Toe Jam Creek	2.5
Western wheatgrass	Pascopyrum smithii	Rosana	4
Scarlet Globemallow	Sphaeralcea coccinea		0.25
Annual sunflower	Helianthus annus		2.5
Mat saltbush	Atriplex confertifolia		2

SEED MIX #9 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs PLS/Acre**
Western wheatgrass	Pascopyrum smithii	Rosana	5
Russian wildrye	Psathyrostachys juncea	Bozoisky	3
Crested wheatgrass	Agropyrum cristatum	Hycrest	3
Annual sunflower	Helianthus annus		5

- The application rate shown in the table is based on 50 pure live seeds (PLS) per square foot, drill-seeded to no greater a depth than 0.25 inch. {*However, shrub species will be seeded during the winter on the ground surface or preferably on top of snow*}. In areas that will not be drill-seeded, the seed mix will be drop seeded or broadcast-seeded on surface roughened sites at twice the application rate shown in the table. If the site is harrowed or dragged, seed will be covered by no more than 0.25 inch of soil.
- No seeding will occur from March 15 to September 1. Fall seeding is preferred and will be conducted after September 1 and prior to ground freezing. Shrub species will be seeded separately and will be seeded during the winter. Spring seeding is less desirable and will be conducted after the frost leaves the ground and no later than March 15.

Erosion Control and Mulching:

- Where applicable, the mitigation techniques such as surface roughening and mulching will be used to keep water on site, thereby enhancing re-vegetation of the site and controlling erosion and runoff.
- All erosion control devices and materials will be installed and maintained to be fully functional until revegetation is determined successful by the BLM.
- Silt fencing, waddles, hay bales, and other erosion control devices will be used where necessary to prevent soil movement from water erosion.
- Mulch will be used if necessary to control wind and water erosion, create vegetation micro-sites, and retain soil moisture on site. Mulches may include native grass hay, small-grain straw, wood fiber, live mulch, cotton, jute, or synthetic netting. Mulch will be certified free of noxious or invasive weed seeds and free from mold and fungi.
- If loose straw or hay mulch is used, it will be crimped into the soil to prevent blowing.

Management of Invasive, Noxious, and Undesirable Species:

- All reclamation equipment will be cleaned prior to use to reduce the potential for introduction of noxious weeds or other undesirable non-native species.
- An intensive and documented weed monitoring and control program will be implemented prior to site preparation for planting and will continue until final reclamation is approved by the BLM.
- Each site where the BLM has not approved interim or final reclamation success will be monitored annually to determine the presence of any invasive, noxious, and undesirable species. Invasive, noxious, and undesirable species that have been identified during monitoring will be promptly treated and controlled, prior to the production of seed heads. A Pesticide Use Proposal (PUP) will be submitted to the BLM for approval prior to the use of herbicides.

Final Reclamation Procedures - Specific

- All disturbed areas, including roads and pipeline right-of-ways, will be recontoured to the contour existing prior to initial construction or a contour that blends indistinguishably with the surrounding landscape. Resalvaged topsoil will be respread evenly over the entire disturbed site to ensure successful revegetation. To help mitigate the contrast of recontoured slopes, reclamation will include measures to feather cleared lines of vegetation and to save and redistribute cleared trees, woody debris, and large rocks over recontoured cut and fill slopes.
- Stormwater management structures and drainage features (i.e., culverts and ditches) will only be installed when absolutely necessary to prevent erosion of fill material. Stormwater management structures and drainage features are not permanent features and will be removed and reseeded when the rest of the site is successfully revegetated and stabilized.
- To ensure timely revegetation, the pad will be fenced to the BLM's standards to exclude livestock grazing for the first two growing seasons or until seeded species become firmly established, whichever comes later. Fencing will meet standards found on page 18 of the Gold Book, 4th Edition, or will be fenced with operational electric fencing.
- Final abandonment of pipelines and flowlines will involve flushing and properly disposing of any fluids in the lines. All surface lines and any lines that are buried close to the surface that may become exposed in the foreseeable future due to water or wind erosion, soil movement, or anticipated subsequent use, must be removed. Deeply buried lines may remain in place unless otherwise directed by the authorized officer.

Reclamation Monitoring and Final Abandonment Approval

- Reclaimed areas will be monitored annually. Actions will be taken to ensure that reclamation standards are met as quickly as reasonably practical and are maintained during the life of the permit.
- The designated WRFO Natural Resource Specialist will be notified via email or by phone 24 hours prior to beginning all reclamation activities associated with this project. Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.
- All seed tags will be submitted via Sundry Notice to the designated Natural Resource Specialist within 14 calendar days from the time the seeding activities have ended. The sundry will include the purpose of the seeding activity (i.e., seeding well pad cut and fill slopes, seeding pipeline corridor, etc.). In addition, the SN will include the well or well pad number associated with the seeding activity, if applicable, the name of the contractor that performed the work, his or her phone number, the method used to apply the seed (e.g., broadcast, hydro-seeded, drilled), whether the seeding activity represents interim or final reclamation, an estimate of the total acres seeded, an attached map that clearly identifies all disturbed areas that were seeded, and the date the seed was applied.
- The operator will meet with the WRFO reclamation staff in March or April of each calendar year and present a comprehensive work plan. The purpose of the plan is to provide information pertaining to reclamation activities that are expected to occur during

the current growing season. The operator will also provide a map that shows all reclamation sites where some form of reclamation activity is expected to occur during the current growing season.

- A Reclamation Status Report will be submitted electronically via email and as a hard-copy to WRFO Reclamation Coordinator. The hardcopy will be submitted to:

  BLM, White River Field Office
  220 East Market Street
  Meeker, Colorado 81641
  Attn: Reclamation Coordinator

  The Reclamation Status Report will be submitted annually for all actions that require disturbance of surface soils on BLM-administered lands as a result of the Proposed Action. Actions may include, but are not limited to, well pad and road construction, construction of ancillary facilities, or power line and pipeline construction. The Reclamation Status Report will be submitted by September 30th of each calendar year, and will include the well number, API number, legal description, UTM coordinates (using the NAD83 datum, Zone 13N coordinate system), project description (e.g., well pad, pipeline, etc.), reclamation status (e.g., Phase I Interim, Phase II Interim, or Final), whether the well pad or pipeline has been re-vegetated and/or re-contoured, percent of the disturbed area that has been reclaimed, method used to estimate percent area reclaimed (e.g., qualitative or quantitative), technique used to estimate percent area reclaimed (e.g., ocular, line-intercept, etc.), date seeded, photos of the reclaimed site, estimate of acres seeded, seeding method (e.g., broadcast, drilled, hydro-seeded, etc.), and contact information for the person(s) responsible for developing the report. The report will be accompanied with maps and GIS data showing each discrete point (i.e., well pad), polygon (i.e., area where seed was applied for Phase I and/or Phase II interim reclamation or area reclaimed for final reclamation), or polyline (i.e., pipeline) feature that was included in the report. Geospatial data shall be submitted: for each completed activity electronically to the designated BLM staff person responsible for the initial request and in accordance with WRFO geospatial data submittal standards (available from WRFO GIS Staff, or on the WRFO website). Internal and external review of the WRFO Reclamation Status Report, and the process used to acquire the necessary information will be conducted annually, and new information or changes in the reporting process will be incorporated into the report.
- In an attempt to track final reclamation of federal actions related to the development of federal mineral resources, the operator shall provide the *designated Natural Resource Specialist* with geospatial data in a format compatible with the WRFO's ESRI ArcGIS Geographic Information System (GIS). These data will be used to accurately locate and identify all geographic as-built (i.e., constructed) features associated with this project and included in the Application for Permit to Drill (APD) or Sundry Notice (SN), as appropriate. These data shall be submitted within 60 days of construction completion. If the operator is unable to submit the required information within the specified time period, the operator shall notify the designated Natural Resource Specialist via email or by phone, and provide justification supporting an extension of the required data submission time period. GIS polygon features may include, but are not limited to, constructed access roads, existing roads that were upgraded, pipeline corridors, and well pad footprints.

Acceptable data formats are: (1) corrected global positioning system (GPS) files with sub-meter accuracy or better; (2) ESRI shapefiles or geodatabases; or, (3) AutoCAD .dwg or .dxf files. If possible, both (2) and (3) should be submitted for each as-build feature. Geospatial data must be submitted in UTM Zone 13N, NAD 83, in units of meters. Data may be submitted as: (1) an email attachment; or (2) on a standard compact disk (CD) in compressed (WinZip only), or uncompressed format. All data shall include metadata, for each submitted layer, that conforms to the *Content Standards for Digital Geospatial Metadata* from the Federal Geographic Data Committee standards. Questions shall be directed to WRFO BLM GIS staff at (970) 878-3800.

If the data is unable to be sent electronically, a compact disk(s) containing the data will be sent to:

BLM, White River Field Office
Attn: NRS Staff
220 East Market Street
Meeker, Colorado 81641

If for any reason the location or orientation of the geographic feature associated with the Proposed Action changes, the operator will submit updated GIS data to designated BLM NRS staff person within 7 calendar days of the change. This information will be submitted via Sundry Notice.

The Authorized Officer will be notified when: 1) reclamation has been completed, 2) appears to be successful, and 3) the site is ready for final inspection

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: Conversion of the Levison 17 Producing Well to Water Alternating Gas (WAG) Injection Well (with associated pipelines).

DETERMINATION OF NEPA ADEQUACY NUMBER: DOI-BLM-CO-110-2012-0120-DNA

DECISION

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-110-2012-0120-DNA, authorizing the construction, operation, and maintenance of the conversion of the Levison 17 well and the associated pipelines.

Mitigation Measures

1. The operator shall employ dust suppression techniques (i.e., freshwater use) whenever there is a visible dust trail behind service vehicles. Any technique other than the use of freshwater as a dust suppressant on BLM lands will require prior written approval from BLM.

2. Chevron will use the Master Surface Plan submitted with the Proposed Action for achieving interim and final reclamation on existing wells when any new disturbance or infrastructure is planned.

3. If salt is observed on the surface of soils during or after reclamation activities Chevron will notify the Natural Resource Specialist and a plan will be developed with approval of the BLM, that may include the administration of soil amendments, the reapplication of soil preparation, seeding, and stabilization measures to achieve successful reclamation.

4. If surface sources are used for freshwater, water hauling trucks must use backflow preventers to avoid contamination of surface waters.

5. The WRFO recommends for these pipeline replacements to use Seed Mix #8 below. The operator will submit proposed seed mixes to BLM via Sundry Notice for review and approval prior to applying the seed.

SEED MIX #8 FROM THE RECLAMATION PROTOCOL			
Common Name	**Scientific Name**	**Variety**	**Lbs. PLS/Acre**
Galleta Grass	Pleuraphis jamesii	Viva florets	3
Indian Ricegrass	Achnatherum hymenoides	Rimrock	3
Bottlebrush squirreltail	Elymus elymoides	Toe Jam Creek	2.5
Western wheatgrass	Pascopyrum smithii	Rosana	4
Scarlet Globemallow	Sphaeralcea coccinea		0.25
Annual sunflower	Helianthus annus		2.5
Mat saltbush	Atriplex confertifolia		2

6. There will be no earthwork or activities allowed from April 15 – July 15 (prairie dog reproductive period) in those instances involving occupied prairie dog habitat. Occupation will be determined through surveys conducted by BLM wildlife staff.

7. Burrowing owl surveys will be required prior to construction initiation if work is planned to take place during the breeding season (April 15 – August 15). Should an active nest be located, no earthwork or activities will be allowed from April 15 – August 15 (or until young have fledged) within ½ mile of any occupied burrowing owl nest location. There will be no surface occupancy allowed within ¼ mile of known nest locations.

8. There will be no earthwork or vegetation removal allowed from May 15 – July 15 in those instances involving new construction (i.e., new well pads or new cross-country pipelines). All sundries will be analyzed on a case-by-case basis. At that time it will be determined by BLM wildlife staff if it is necessary to impose the above timing limitation based on the degree of impact the action presents to migratory birds.

9. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the Authorized Officer (AO). Chevron will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. Chevron, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

10. Pursuant to 43 CFR 10.4(g), Chevron must notify the AO, by telephone and 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), Chevron must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.

11. Chevron is responsible for informing all persons who are associated with the projects 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, Chevron must immediately contact the appropriate BLM representative.

12. If any paleontological resources are discovered as a result of operations under this authorization, Chevron or any of their agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 working days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

13. The permittee/applicant is responsible for informing all persons who are associated with the allotment/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 permittee/applicant must immediately contact the appropriate BLM representative. The AO may require occasional spot checking of trenching operations to inspect for possible presence of fossil resources.

14. The AO may require occasional spot checking of trenching operations to inspect for possible presence of fossil resources.

15. All lessees and/or operators and right-of-way holders shall comply with all federal, state and/or local laws, rules, and regulations, including but not limited to onshore orders and notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment.

16. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

17. As a reasonable and prudent lessee/operator in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.

18. As a reasonable and prudent lessees/operator and/or right-of-way holder in the oil and gas industry, acting in good faith, all lessees/operators and right-of-way holders will provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the lessee/operator or right-of-way holder fails, refuses or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground) and soils at the lessee/operator's expense. Such action will not relieve the lessee/operator of any liability or responsibility.

19. With the acceptance of this authorization, the commencement of operations under this authorization, or within thirty calendar days from the issuance of this authorization, whichever occurs first, and during the life of the pipeline, the right-of-way holder and the lessee/operator, and through the right-of-way holder and lessee/operator, its agents, employees, subcontractors, successors and assigns, stipulate and agree to indemnify, defend and hold harmless the United States Government, its agencies, and employees from all liability associated with the emission or release of substances that pose a risk of harm to human health or the environment.

20. Any livestock control facilities and/or rangeland improvements impacted during this operation will be replaced or repaired to their prior condition.

21. To avoid impacts to existing realty rights-of-way, Chevron would need to coordinate with right-of-way holders prior to any construction activity.

COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN

This decision is in compliance with 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

Scoping was the primary mechanism used by the BLM to initially identify issues. Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on July 24, 2012. External scoping was conducted by posting this project on the WRFO's on-line National Environmental Policy Act (NEPA) register on July 24, 2012. No comments or inquiries were received regarding this project from the public as of May 6, 2013.

RATIONALE

Analysis of the Proposed Action has concluded that there are no significant negative impacts and that it meets Colorado Standards for Public Land Health. The geographic extent and temporal scale that was used to address perceived and anticipated impacts associated with this project included the cumulative analysis of impacts to soil, air, wildlife, vegetation, cultural and paleontological resources that occur or that are expected to occur within the project area. This approach has resulted in a comprehensive review of perceived and anticipated impacts associated with oil and gas operations that will most likely occur in the project area in the next five years and beyond. The integrity of these older lines is low and these lines need to be replaced in this existing field to prevent environmental release of fluids, which could be a safety concern. These lines are also being replaced within the existing pipeline corridor.

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: 05/16/13