

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

Section 390
Categorical Exclusion for
Oil and Gas Development

NUMBER: DOI-BLM-CO-N05-2014-0061-CX
DOI-BLM-CO-N05-2014-0130-CX
DOI-BLM-CO-N05-2014-0131-CX
DOI-BLM-CO-N05-2014-0132-CX
DOI-BLM-CO-N05-2014-0133-CX
DOI-BLM-CO-N05-2014-0134-CX
DOI-BLM-CO-N05-2014-0135-CX
DOI-BLM-CO-N05-2014-0136-CX

CASEFILE/PROJECT NUMBER: COC60739

PROJECT NAME: WPX's request to drill an additional 8 wells on the existing RGU 41-8-298 well pad (8 APDs)

LEGAL DESCRIPTION: T. 2 S., R. 98 W., Sec. 8, 6th Principle Meridian

APPLICANT: WPX Energy Rocky Mountain, LLC.

DESCRIPTION OF PROPOSED ACTION: WPX Energy is proposing to drill eight additional wells on the existing RGU 41-8-298 well pad. In addition, WPX will expand the existing location approximately 2 acres to accommodate the additional wells. The existing well pad footprint occupies approximately 5 acres; the well pad footprint will occupy approximately 7 acres after expansion. The operator has confirmed that this action will not require the construction of any new road or pipeline corridors; the existing road and pipeline corridors will be used to service the eight proposed wells. There is one producing well on the location.

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with (43 CFR 1610.5, BLM 1617.3) the following plan:

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

Date Approved: July 1, 1997

Decision Number/Page: Page 2-5

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

CATEGORICAL EXCLUSION REVIEW: The Energy Policy Act of 2005 (P.L. 109-58) prescribed five categorical exclusions (CX) for activities whose purpose is for the exploration of oil or gas.

The Proposed Action qualifies as a categorical exclusion under the Section 390 of the Energy Policy Act, #1: “*Individual surface disturbances of less than five acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to the NEPA has been previously completed.*”

Documentation

The BLM NEPA Handbook (H-1790-1) provides specific instructions for using this CX.

1) Is surface disturbance associated with the Proposed Action less than five acres?

Yes. WPX will expand the existing location approximately 2 acres to accommodate the additional eight natural gas wells. The existing well pad footprint occupies approximately 5 acres; the well pad footprint will occupy approximately 7 acres after expansion. The operator has confirmed that this action will not require the construction of any road or pipeline corridors; the existing road and pipelines will be used to service the two proposed wells.

2) Is there less than 150 acres of surface disturbance, including the Proposed Action, on the entire leasehold?

Estimates of surface disturbance within the lease (COC60739 at the surface location) that are most likely attributed to oil and gas exploration and production activities equal approximately 21 acres. This area represents 2 percent of the total area of the lease, which is approximately 1,080 acres in size.

3) Is the Proposed Action within the boundaries of an area included in a site-specific NEPA document? (The NEPA document must have analyzed the exploration and/or development of oil and gas (not just leasing) and the action/activity being considered must be within the boundaries of the area analyzed in the environmental assessment (EA) or environmental impact statement (EIS). The NEPA document need not have addressed the specific permit or application being considered.)

Yes. Potential impacts associated with construction of the 41-8-298 well pad and drilling natural gas wells were reviewed in BLM-CO-110-2006-053-EA (signed on 3/23/2006).

INTERDISCIPLINARY REVIEW: Internal scoping was initiated when the project was presented to the White River Field Office (WRFO) interdisciplinary team on 4/1/2014. External

scoping was conducted by posting this project on the WRFO's on-line National Environmental Policy Act (NEPA) register on 4/15/2014.

Name	Title	Resource	Date
Michael Selle	Archaeologist	Cultural Resources, Native American Religious Concerns	7/7/2014
Ed Hollowed	Wildlife Biologist	Special Status Wildlife Species	4/21/2014
Matthew Dupire	Range Management Specialist/Ecologist	Special Status Plant Species	7/29/2014
Matthew Dupire	Rangeland Management Specialist	Vegetation, Invasive, non-Native Species	7/29/2014

REMARKS:

Cultural Resources: The proposed well expansion area has been inventoried at the Class III (100 percent) pedestrian level (Conner 2005 compliance dated 8/1/2005, Conner *et al* 2013 compliance dated 12/18/2013). These inventories have not identified any cultural resources within the proposed expansion area. The nearest known resource is approximately 1,158 feet (353 meters) from the center of the pad and unlikely to be directly impacted by pad expansion and drilling activities.

Due to the increase of human activity in the area due to the drilling and operations of natural gas wells in the vicinity of fragile cultural resources there is the potential for adverse impacts to cultural resources and unlawful collection of surface artifacts. Any losses to the cultural resources would constitute a long term, permanent, irreversible and irretrievable loss of data from the regional archaeological database.

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 proposed additional wells are located in an area generally mapped as the Uintah Formation (Tweto 1979) which the BLM has classified as a Potential Fossil Yield Classification (PFYC) 5 formation. Formations that are in the PFYC 5 classification are known to produce scientifically noteworthy fossils (c. Armstrong and Wolny 1989). The possibility exists that any excavation into the underlying sedimentary rock formation for well cellars or pits or other support features have a potential to impact scientifically noteworthy fossils.

Should any fossil resources be impacted by development activities associate with the additional wells on this pad it would represent a long term, permanent, irreversible and irretrievable loss of data from the regional paleontological database.

Threatened and Endangered Wildlife Species: There are no threatened or endangered animal species that are known to inhabit or derive important direct use from the project area. Water use necessary for well development and production has been previously evaluated and mitigated through the formal Section 7 process (Programmatic Biological Assessment and FWS

concurrency dated May 20, 2008 and December 19, 2008, respectively) in the context of flow depletion effects on the Colorado River fishes. A single long-eared owl nest site is located about 40 meters downslope from the nearest pipeline installation activity. The site, last known active in 2010, is situated along an improved and frequently travelled county road opposite the pipeline alignment. Pipeline installation activity would not be visible from the nest and in the worst case (i.e., nest active and construction coincident with the nesting season) would not be expected to elevate disturbance levels beyond that associated with normal well-field traffic noise. The current proposed action poses no further wildlife-related issues that were not addressed in the parent document (CO-110-2006-053-EA).

Threatened and Endangered Plant Species: This area is not identified as suitable habitat for special status plant species and the proposed project is not expected to have any impacts on special status plants.

Vegetation and Invasive and Non-native Species: Expansion of the well pad will require the complete removal of all vegetation on an additional 2 acres. Removal of vegetation on this area will create a larger area for non-native species to establish on the project area. The SUPO does address interim reclamation and final reclamation for the additional disturbance on the well pad and is expected to mitigate losses of vegetation and the potential for noxious weed establishment.

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.

Conner, Carl E.

2005 Class III Cultural Resources inventory for Four Proposed Well Locations (RGU 12-3-298D, RGU 32-5-298, RGU 41-8-298 and the RGU 33-7-298) and Related Linear Routes (8700 feet) in Rio Blanco County, Colorado for Williams Production RMT. Grand River Institute, Grand Junction, Colorado. (05-11-21: OAH #RB.LM.R867)

Conner, Carl E., Dakota Kramer, Rich Ott, Barbara Davenport, Natalie Higginson, James C. Miller, Hanna Mills, Min Huei, Nicole Darnell, and Cortney Groff

2013 Class III Cultural Resources Inventory Report for the Piceance Basin Phased Project: Phase I – Ryan Gulch and Central Facility, Phase II- East PRL, Phase II – Pipelines and Reservoirs, in Rio Blanco County, Colorado, for Shell Exploration and Production Company. Grand River Institute, Grand Junction, Colorado. (13-11-15: OAH # RB.LM.R1350)

Tweto, Ogden

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

MITIGATION: The following mitigation is based on that found in DOI-BLM-CO-110-2006-053-EA and applies to drilling and maintenance activities associated with the proposed eight natural gas wells:

1. The operator will be responsible for complying with all local, state, and federal air quality regulations as well as providing documentation to the BLM that they have done so. To minimize production of fugitive particulate matter, vehicle speeds must not exceed 15 mph *or* dust plume must not be visible at appropriate designated speeds for road design. In addition, the application of a BLM approved dust suppressant (e.g. water or chemical stabilization methods) will be required during dry periods when dust plumes are visible at speeds less than or equal to 15 mph. Surfacing the roadway with gravels will also help mitigate production of fugitive particulate matter.
2. To reduce production of fugitive particulate matter originating from well pads and associated stockpiled soils (long term storage) interim reclamation will be required. Interim reclamation will consist of excess stockpiled soils associated with pad construction being pulled back over the portion of the well pad not being utilized for production facilities and access. Portions of the well pad undergoing interim reclamation will be returned to grade (as close as possible), promptly re-seeded, and biodegradable fabrics will be utilize on slopes exceeding 5% (e.g. fill slopes).
3. If interim reclamation is not practical (e.g. completion of drilling operation will require an extended period time (multiple well pads)), stockpiled topsoil will be covered with biodegradable fabrics such as (but not limited to) jute netting and seeded with a BLM approved seed mixture (see vegetation section of this document). Furthermore, soils stockpiled for short durations (e.g. during road/pipeline construction/maintenance) will be wetted during dry periods to reduce production of fugitive particulate matter.
4. The operator will be required to monitor the project area for a minimum of three years post disturbance and eradicate all noxious and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.
5. For the RGU 41-8-298 location all construction equipment shall be washed prior to leaving county road 26 and entering onto BLM lands to prevent the establishment of noxious weeds within the prescribed burn area. The operator is required to remove all dirt and debris that could contain weed seeds by scraping off visible dirt and debris then thoroughly washing all earth moving equipment with a suitable power washer.
6. It will be the responsibility of the operator to effectively preclude migratory bird access to, or contact with, reserve pit contents that possess toxic properties (i.e., through ingestion or exposure) or have potential to compromise the water-repellent properties of birds' plumage. Exclusion methods may include netting, the use of "bird-balls", or other alternative methods that effectively eliminate migratory bird contact with pit contents and meet BLM's approval. It will be the responsibility of the operator to notify the BLM of the method that will be used to eliminate migratory bird use two weeks prior to initiation of drilling activities. The BLM-approved method will be applied within 24 hours after drilling activities have begun. All

lethal and non-lethal events that involve migratory birds will be reported to a White River Field Office Petroleum Engineer Technician immediately.

7. Pad and road construction, drilling, well completion, workover activity, and reclamation associated with the RGU 41-8-298 location would be subject to the RMP-approved timing limitation stipulation TL-04, which disallows disruptive activity within ¼ mile of raptor nests from February 1 through August 15.
8. The applicant shall be required to collect and properly dispose of any solid waste generated by the proposed actions.
9. The operator will be responsible for complying with all local, state, and federal water quality regulations (such as but not limited to Phase I Storm Water Permit, and Industrial Wastewater/Produced Water Permits). The operator will also be required to provide the BLM with documentation that all required permits were obtained.
10. Surface Water: All surface disturbing activities will strictly adhere to “Gold Book” surface operating standards for oil and gas exploration and development (copies of the “Gold Book” can be obtained at the WRFO). Corrugated metal pipes (CMPs) are not recommended on slopes less than 10% and will NOT be used as drainage relief structures for stream crossings/gullies or to drain inside drain ditches on slopes less than 3%. Based on the nature of the affected soils, drain dips will be utilized in place of CMPs in these locations. Energy dissipaters such as large gravels/small cobbles will be used at culvert and drainage dip outlets to minimize additional erosion. To mitigate water being channelized down roadways, all activity must stop when soils or road surfaces become saturated to a depth of three inches. Mud blading will be prohibited in attempts to reduce further soil displacement. Furthermore, following abandonment of the well pad all disturbed surfaces will be recontoured to the original grade promptly covered with a sufficient amount of woody debris (if available) and revegetated with the appropriate seed mixture as outlined in the vegetation section of this document.
11. To mitigate surface erosion at well pads, interim reclamation will be required as outlined in the Air Quality mitigation section above. In addition, silt fences will be utilized on all slopes exceeding 5 % (e.g. cut/fill slopes and soil stockpiles).
12. The operator shall comply with “Gold Book” surface operating standards for constructing well pads, pipelines and access roads (copies of the “Gold Book” can be obtained at the WRFO). The identified portion of access road to location RGU 41-8-298 will require an engineered design and reclamation plan which is to be approved by the area manager prior to construction. Interim reclamation will be required as addressed in the Air and Water Quality portions of this document. To mitigate contamination of soils and local ground water, environmentally unfriendly substances (e.g., diesel) must not be allowed to contact soils. The use of impermeable matting under equipment (tanks, pumps, or other equipment used in handling potentially hazardous liquids) is recommended to intercept contaminants prior to contacting soils. Complete reclamation will follow abandonment of well pads. New access

roads and well pads will be recontoured and 100% of disturbed surfaces will be revegetated with the suggested seed mixture as outlined in the vegetation section of this document.

13. If construction/development occurs between April 15 and November 15, the operator will be required to water or surface access roads to reduce airborne dust and damage to roadside vegetation communities
14. The operator has two options for treatment of slash from this project. A hydro-ax or other mulching type machine could be used to remove the trees. The machines are capable of shredding trees up to 12" in diameter and 15' tall as well as mowing brush like a conventional brush beater. It generally leaves small branches and pieces of wood from pencil size up to bowling ball size and the mulch is evenly scattered across the surface. This would effectively breakdown the woody fuel and scatters the debris thereby eliminating any hazardous fuel load adjacent to the new road and well pad. The other option would be to cut trees and have them removed for firewood, posts, or other products. The branches and tops should be lopped and scattered to a depth of 24 inches or less. If the products are left for collection by the general public, they should be stacked in small manageable piles along the roadside or pad to facilitate removal. For material brought back onto the pipeline r-o-w the material should be evenly scattered, so as to not create jackpots, and the material should not exceed 5 tons /acre.
15. The applicant will be billed for the forest materials removed as described by the proposed action. Forestry concurs with mitigation proposed by fire management. This would also decrease the opportunity for an outbreak of pine beetle.
16. If produced or drilling water is hauled during the period May 15 to October 15, the operator will be required to water access roads or otherwise provide for dust abatement in order to reduce damage to and loss of vegetation.
17. The holder shall construct, operate, and maintain the facilities, improvements, and structures within this right-of-way in strict conformity with the plan(s) of development which was (were) approved and made part of the grant on issuance Any relocation, additional construction, or use that is not in accord with the approved plan(s) of development, shall not be initiated without the prior written approval of the authorized officer. A copy of the complete right-of-way grant, including all stipulations and approved plan(s) of development, shall be made available on the right-of-way area during construction, operation, and termination. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health and safety or the environment.
18. The holder shall contact the authorized officer at least five days prior to the anticipated start of construction and/or any surface disturbing activities. The authorized officer may require and schedule a preconstruction conference with the holder prior to the holder's commencing construction and/or surface disturbing activities on the right-of-way. The holder and/or his representative shall attend this conference. The holder's contractor, or agents involved with construction and/or any surface disturbing activities associated with the right-of-way, shall

also attend this conference to review the stipulations of the grant including the plans(s) of development.

19. No surface disturbing activities shall take place on the subject right-of-way until the associated APD is approved. The holder will adhere to special stipulations in the Surface Use Program of the approved APD, relevant to any right-of-way facilities.
20. The holder shall be responsible for weed control on disturbed areas within the limits of the right-of-way. The holder is responsible for consultation with the authorized officer and/or local authorities for acceptable weed control methods (within limits imposed in the grant stipulations).
21. The holder shall protect all survey monuments found within the right-of-way. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coastal and Geodetic benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments. In the event of obliteration or disturbance of any of the above, the holder shall immediately report the incident, in writing, to the authorized officer and the respective installing authority if known. Where General Land Office or Bureau of Land Management right-of-way monuments or references are obliterated during operations, the holder shall secure the services of a registered land surveyor or a Bureau cadastral surveyor to restore the disturbed monuments and references using surveying procedures found in the Manual of Surveying Instructions for the Survey of the Public Lands in the United States, latest edition. The holder shall record such survey in the appropriate county and send a copy to the authorized officer. If the Bureau cadastral surveyors or other Federal surveyors are used to restore the disturbed survey monument, the holder shall be responsible for the survey cost.
22. The holder shall survey and clearly mark the centerline and/or exterior limits of the right-of-way prior to any surface disturbing activity, as determined by the authorized officer.
23. No construction or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support construction equipment. If such equipment creates ruts in excess of three inches deep, the soil shall be deemed too wet to adequately support construction equipment.
24. The holder shall conduct all activities associated with the construction, operation, and termination of the right-of-way within the authorized limits of the right-of-way.
25. The holder shall inform the authorized officer within 48 hours of any accidents on federal lands that require reporting to the Department of Transportation as required by 49 CFR Part 195.
26. The holder is prohibited from discharging oil or other pollutants into or upon the navigable waters of the United States, adjoining shorelines, or the waters of the contiguous zone in violation of Section 311 of the Clean Water Act as amended, 33 U.S.C. 1321, and the

regulations issued thereunder, or applicable laws of the State(s) of xx and regulations issued thereunder. Holder shall give immediate notice of any such discharge to the authorized officer and such other Federal and State officials as are required by law to be given such notice.

27. Prior to any discharge, hydrostatic testing water will be tested and processed, if necessary, to ensure that the water meets local, State or Federal water quality standards. Prior to discharge of hydrostatic testing water from the pipeline, the holder shall design and install a suitable energy dissipater at the outlets, and design and install suitable channel protection structures necessary to ensure that there will be no erosion or scouring of natural channels within the affected watershed as a result of such discharge. The holder will be held responsible for any erosion or scouring resulting from such discharge. Sandbags, rock, or other materials or objects installed shall be removed from the site upon completion of hydrostatic testing.
28. Promptly revegetate all disturbed areas with Native Seed Mix #3. It is recommended that seeding occur between September 1st and February 29th immediately following completion of the wells to provide the best opportunity for seed germination and establishment. Seed mixture rates are Pure Live Seed (PLS) pounds per acre. Drill seeding is the preferred method of application.

Native Seed Mix #3		
Western wheatgrass (Rosanna)	2	Gravelly 10"-14", Pinyon/Juniper Woodland, Stony Foothills, 147 (Mountain Mahogany)
Bluebunch wheatgrass (Whitmar)	2	
Needle and thread	1	
Indian ricegrass (Rimrock)	2	
Fourwing saltbush (Wytana)	1	
Utah sweetvetch	1	

29. It will be the responsibility of the operator to prevent use by migratory birds of reserve pits that store or are expected to store fluids which may pose a risk to such birds (e.g., migratory waterfowl, shorebirds, wading birds and raptors) during completion and after completion activities have ceased. Methods may include netting, the use of bird-balls, or other alternative methods that effectively prevent use and that meet BLM approval. It will be the responsibility of the operator to notify the BLM via **Sundry Notice** of the method that will be used to prevent use two weeks prior to when completion activities are expected to begin. The BLM approved method will be applied within 24 hours after completion activities have begun. All lethal and non-lethal events that involve migratory birds will be reported to the Petroleum Engineer Technician immediately.
30. Ground Water: Shallow aquifers shall be protected from hydrofracturing and the production of oil and gas by installation and cementing of surface and intermediate casing. Any groundwater produced from the Fort Union or Mesaverde Formations will be hauled off and disposed of due to poor water quality and therefore preventing adverse impacts to valuable surface and ground water resources. Environmentally unfriendly substances (e.g. diesel) must not be allowed to contact soils. The use of spill-guards (or equivalent spill prevention equipment) under and around pumping equipment and frac-tanks will be used to intercept

such contaminants prior to infiltrating soils and contaminating ground water. Furthermore, all pits shall be lined and all wastes associated with construction and drilling (including produced water) will be properly treated and disposed of. The operator will be required to monitor BLM spring 184-04 for water quality and flow rates starting from the first day of drilling until successful interim reclamation (as determined by the BLM) is completed. All access roads and well pads will be designed to “Gold Book” standards (as outlined above) to maintain natural surface water drainage and ground water recharge patterns.

31. Erosion and sediment control measures will be installed on all slopes exceeding five percent to mitigate soil loss. Erosion and sediment control measures will be maintained until stream banks and adjacent upland areas are stabilized.
32. Road speed limits (with the exception of Rio Blanco County Road 24) will be 15 miles per hour to aid in dust abatement and improves overall traffic safety.
33. The sodium lease holders shall be notified by the operator of their plans to drill wells on the RGU 41-8-298 well pad prior to the commencement of surface disturbing activities.
34. To prove ownership of any aquifer contamination or drilling influence, a fluorescent dye other than Rhodamin WT, should be added to all drilling fluids used through the Green River formation while drilling wells on the RGU 41-8-298 well pad.
35. For wells drilled on the RGU 41-8-298 well pad, drilling fluid should be sampled and analyzed for pH and conductivity every 100 feet from surface to 100 feet below the dissolution surface. WPX will document fluid losses during drilling operations through the Green River Formation. The analysis of the fluid samples and fluid loss documentation will be supplied to the BLM Meeker office within 30 days of drilling.
36. The Colorado-One-Call procedures will be implemented before any surface disturbing activities for the pipelines take place.
37. All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed onsite shall be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.
38. The operator will be required to maintain the fences they encounter during the project in working order (e.g., cut fence will be repaired, gates will be closed, cattleguards repaired, and fence laid down will be put up).

The following mitigation also applies to the Proposed Action:

39. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
40. 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 AO. The applicant 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. The applicant, 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.

41. Pursuant to 43 CFR 10.4(g), the applicant 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), the applicant must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
42. The applicant is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
43. If any paleontological resources are discovered as a result of operations under this authorization, the applicant or any of his 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 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.
44. Any excavations into the underlying native sedimentary stone must be monitored by a permitted paleontologist. The monitoring paleontologist must be present before the start of excavations that may impact bedrock.

MONITORING AND COMPLIANCE: On-going compliance inspections and monitoring of drilling, production, and post-production activities will be conducted by White River Field Office staff during construction of well pads, access roads, and pipelines. Specific mitigation developed in the associated Categorical Exclusion and the lease terms and conditions 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: Brett Smithers

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

COMPLIANCE WITH NEPA

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with Section 390 of the Energy Policy.

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

DATE SIGNED:

ATTACHMENTS:

09/25/2014

Figure 1. Project area map.

Figure 2. Aerial photo of existing disturbance and the proposed 3 inch water line.



Figure 2. The image above illustrates the geographic location of the existing well pad and the associated road and pipeline infrastructure. In addition, the image illustrates new disturbance (yellow polygons) that would result if the Proposed Action is approved and implemented.

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

DECISION

PROJECT NAME: WPX's request to drill an additional 8 wells on the existing RGU 41-8-298 well pad (8 APDs)

CATEGORICAL EXCLUSION NUMBER: DOI-BLM-CO-110-2014-0061-CX

DECISION: It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-110-2014-0061-CX, authorizing construction, drilling and maintenance activities for the proposed eight natural gas wells on the existing RGU 41-8-298 location.

MITIGATION: The following mitigation is based on that found in DOI-BLM-CO-110-2006-053-EA and applies to drilling and maintenance activities associated with the proposed eight natural gas wells:

1. The operator will be responsible for complying with all local, state, and federal air quality regulations as well as providing documentation to the BLM that they have done so. To minimize production of fugitive particulate matter, vehicle speeds must not exceed 15 mph *or* dust plume must not be visible at appropriate designated speeds for road design. In addition, the application of a BLM approved dust suppressant (e.g. water or chemical stabilization methods) will be required during dry periods when dust plumes are visible at speeds less than or equal to 15 mph. Surfacing the roadway with gravels will also help mitigate production of fugitive particulate matter.
2. To reduce production of fugitive particulate matter originating from well pads and associated stockpiled soils (long term storage) interim reclamation will be required. Interim reclamation will consist of excess stockpiled soils associated with pad construction being pulled back over the portion of the well pad not being utilized for production facilities and access. Portions of the well pad undergoing interim reclamation will be returned to grade (as close as possible), promptly re-seeded, and biodegradable fabrics will be utilize on slopes exceeding 5% (e.g. fill slopes).
3. If interim reclamation is not practical (e.g. completion of drilling operation will require an extended period time (multiple well pads)), stockpiled topsoil will be covered with biodegradable fabrics such as (but not limited to) jute netting and seeded with a BLM approved seed mixture (see vegetation section of this document). Furthermore, soils stockpiled for short durations (e.g. during road/pipeline construction/maintenance) will be wetted during dry periods to reduce production of fugitive particulate matter.

4. The operator will be required to monitor the project area for a minimum of three years post disturbance and eradicate all noxious and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.
5. For the RGU 41-8-298 location all construction equipment shall be washed prior to leaving county road 26 and entering onto BLM lands to prevent the establishment of noxious weeds within the prescribed burn area. The operator is required to remove all dirt and debris that could contain weed seeds by scraping off visible dirt and debris then thoroughly washing all earth moving equipment with a suitable power washer.
6. It will be the responsibility of the operator to effectively preclude migratory bird access to, or contact with, reserve pit contents that possess toxic properties (i.e., through ingestion or exposure) or have potential to compromise the water-repellent properties of birds' plumage. Exclusion methods may include netting, the use of "bird-balls", or other alternative methods that effectively eliminate migratory bird contact with pit contents and meet BLM's approval. It will be the responsibility of the operator to notify the BLM of the method that will be used to eliminate migratory bird use two weeks prior to initiation of drilling activities. The BLM-approved method will be applied within 24 hours after drilling activities have begun. All lethal and non-lethal events that involve migratory birds will be reported to a White River Field Office Petroleum Engineer Technician immediately.
7. Pad and road construction, drilling, well completion, workover activity, and reclamation associated with the RGU 41-8-298 location would be subject to the RMP-approved timing limitation stipulation TL-04, which disallows disruptive activity within ¼ mile of raptor nests from February 1 through August 15.
8. The applicant shall be required to collect and properly dispose of any solid waste generated by the proposed actions.
9. The operator will be responsible for complying with all local, state, and federal water quality regulations (such as but not limited to Phase I Storm Water Permit, and Industrial Wastewater/Produced Water Permits). The operator will also be required to provide the BLM with documentation that all required permits were obtained.
10. Surface Water: All surface disturbing activities will strictly adhere to "Gold Book" surface operating standards for oil and gas exploration and development (copies of the "Gold Book" can be obtained at the WRFO). Corrugated metal pipes (CMPs) are not recommended on slopes less than 10% and will NOT be used as drainage relief structures for stream crossings/gullies or to drain inside drain ditches on slopes less than 3%. Based on the nature of the affected soils, drain dips will be utilized in place of CMPs in these locations. Energy dissipaters such as large gravels/small cobbles will be used at culvert and drainage dip outlets to minimize additional erosion. To mitigate water being channelized down roadways, all activity must stop when soils or road surfaces become saturated to a depth of three inches. Mud blading will be prohibited in attempts to reduce further soil displacement. Furthermore, following abandonment of the well pad all disturbed surfaces will be recontoured to the original grade promptly covered with a sufficient amount of woody debris (if available) and

revegetated with the appropriate seed mixture as outlined in the vegetation section of this document.

11. To mitigate surface erosion at well pads, interim reclamation will be required as outlined in the Air Quality mitigation section above. In addition, silt fences will be utilized on all slopes exceeding 5 % (e.g. cut/fill slopes and soil stockpiles).
12. The operator shall comply with “Gold Book” surface operating standards for constructing well pads, pipelines and access roads (copies of the “Gold Book” can be obtained at the WRFO). The identified portion of access road to location RGU 41-8-298 will require engineered design and reclamation plan which is to be approved by the area manager prior to construction. Interim reclamation will be required as addressed in the Air and Water Quality portions of this document. To mitigate contamination of soils and local ground water, environmentally unfriendly substances (e.g., diesel) must not be allowed to contact soils. The use of impermeable matting under equipment (tanks, pumps, or other equipment used in handling potentially hazardous liquids) is recommended to intercept contaminants prior to contacting soils. Complete reclamation will follow abandonment of well pads. New access roads and well pads will be recontoured and 100% of disturbed surfaces will be revegetated with the suggested seed mixture as outlined in the vegetation section of this document.
13. If construction/development occurs between April 15 and November 15, the operator will be required to water or surface access roads to reduce airborne dust and damage to roadside vegetation communities
14. The operator has two options for treatment of slash from this project. A hydro-ax or other mulching type machine could be used to remove the trees. The machines are capable of shredding trees up to 12" in diameter and 15' tall as well as mowing brush like a conventional brush beater. It generally leaves small branches and pieces of wood from pencil size up to bowling ball size and the mulch is evenly scattered across the surface. This would effectively breakdown the woody fuel and scatters the debris thereby eliminating any hazardous fuel load adjacent to the new road and well pad. The other option would be to cut trees and have them removed for firewood, posts, or other products. The branches and tops should be lopped and scattered to a depth of 24 inches or less. If the products are left for collection by the general public, they should be stacked in small manageable piles along the roadside or pad to facilitate removal. For material brought back onto the pipeline r-o-w the material should be evenly scattered, so as to not create jackpots, and the material should not exceed 5 tons /acre.
15. The applicant will be billed for the forest materials removed as described by the proposed action. Forestry concurs with mitigation proposed by fire management. This would also decrease the opportunity for an outbreak of pine beetle.
16. If produced or drilling water is hauled during the period May 15 to October 15, the operator will be required to water access roads or otherwise provide for dust abatement in order to reduce damage to and loss of vegetation.

17. The holder shall construct, operate, and maintain the facilities, improvements, and structures within this right-of-way in strict conformity with the plan(s) of development which was (were) approved and made part of the grant on issuance. Any relocation, additional construction, or use that is not in accord with the approved plan(s) of development, shall not be initiated without the prior written approval of the authorized officer. A copy of the complete right-of-way grant, including all stipulations and approved plan(s) of development, shall be made available on the right-of-way area during construction, operation, and termination. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health and safety or the environment.
18. The holder shall contact the authorized officer at least five days prior to the anticipated start of construction and/or any surface disturbing activities. The authorized officer may require and schedule a preconstruction conference with the holder prior to the holder's commencing construction and/or surface disturbing activities on the right-of-way. The holder and/or his representative shall attend this conference. The holder's contractor, or agents involved with construction and/or any surface disturbing activities associated with the right-of-way, shall also attend this conference to review the stipulations of the grant including the plans(s) of development.
19. No surface disturbing activities shall take place on the subject right-of-way until the associated APD is approved. The holder will adhere to special stipulations in the Surface Use Program of the approved APD, relevant to any right-of-way facilities.
20. The holder shall be responsible for weed control on disturbed areas within the limits of the right-of-way. The holder is responsible for consultation with the authorized officer and/or local authorities for acceptable weed control methods (within limits imposed in the grant stipulations).
21. The holder shall protect all survey monuments found within the right-of-way. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coastal and Geodetic benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments. In the event of obliteration or disturbance of any of the above, the holder shall immediately report the incident, in writing, to the authorized officer and the respective installing authority if known. Where General Land Office or Bureau of Land Management right-of-way monuments or references are obliterated during operations, the holder shall secure the services of a registered land surveyor or a Bureau cadastral surveyor to restore the disturbed monuments and references using surveying procedures found in the Manual of Surveying Instructions for the Survey of the Public Lands in the United States, latest edition. The holder shall record such survey in the appropriate county and send a copy to the authorized officer. If the Bureau cadastral surveyors or other Federal surveyors are used to restore the disturbed survey monument, the holder shall be responsible for the survey cost.

22. The holder shall survey and clearly mark the centerline and/or exterior limits of the right-of-way prior to any surface disturbing activity, as determined by the authorized officer.
23. No construction or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support construction equipment. If such equipment creates ruts in excess of three inches deep, the soil shall be deemed too wet to adequately support construction equipment.
24. The holder shall conduct all activities associated with the construction, operation, and termination of the right-of-way within the authorized limits of the right-of-way.
25. The holder shall inform the authorized officer within 48 hours of any accidents on federal lands that require reporting to the Department of Transportation as required by 49 CFR Part 195.
26. The holder is prohibited from discharging oil or other pollutants into or upon the navigable waters of the United States, adjoining shorelines, or the waters of the contiguous zone in violation of Section 311 of the Clean Water Act as amended, 33 U.S.C. 1321, and the regulations issued thereunder, or applicable laws of the State(s) of xx and regulations issued thereunder. Holder shall give immediate notice of any such discharge to the authorized officer and such other Federal and State officials as are required by law to be given such notice.
27. Prior to any discharge, hydrostatic testing water will be tested and processed, if necessary, to ensure that the water meets local, State or Federal water quality standards. Prior to discharge of hydrostatic testing water from the pipeline, the holder shall design and install a suitable energy dissipater at the outlets, and design and install suitable channel protection structures necessary to ensure that there will be no erosion or scouring of natural channels within the affected watershed as a result of such discharge. The holder will be held responsible for any erosion or scouring resulting from such discharge. Sandbags, rock, or other materials or objects installed shall be removed from the site upon completion of hydrostatic testing.
28. Promptly revegetate all disturbed areas with Native Seed Mix #3. It is recommended that seeding occur between September 1st and February 29th immediately following completion of the wells to provide the best opportunity for seed germination and establishment. Seed mixture rates are Pure Live Seed (PLS) pounds per acre. Drill seeding is the preferred method of application.

Native Seed Mix #3		
Western wheatgrass (Rosanna)	2	Gravelly 10"-14", Pinyon/Juniper Woodland, Stony Foothills, 147 (Mountain Mahogany)
Bluebunch wheatgrass (Whitmar)	2	
Needle and thread	1	
Indian ricegrass (Rimrock)	2	
Fourwing saltbush (Wytana)	1	
Utah sweetvetch	1	

29. It will be the responsibility of the operator to prevent use by migratory birds of reserve pits that store or are expected to store fluids which may pose a risk to such birds (e.g., migratory waterfowl, shorebirds, wading birds and raptors) during completion and after completion activities have ceased. Methods may include netting, the use of bird-balls, or other alternative methods that effectively prevent use and that meet BLM approval. It will be the responsibility of the operator to notify the BLM via **Sundry Notice** of the method that will be used to prevent use two weeks prior to when completion activities are expected to begin. The BLM approved method will be applied within 24 hours after completion activities have begun. All lethal and non-lethal events that involve migratory birds will be reported to the Petroleum Engineer Technician immediately.
30. **Ground Water:** Shallow aquifers shall be protected from hydrofracturing and the production of oil and gas by installation and cementing of surface and intermediate casing. Any groundwater produced from the Fort Union or Mesaverde Formations will be hauled off and disposed of due to poor water quality and therefore preventing adverse impacts to valuable surface and ground water resources. Environmentally unfriendly substances (e.g. diesel) must not be allowed to contact soils. The use of spill-guards (or equivalent spill prevention equipment) under and around pumping equipment and frac-tanks will be used to intercept such contaminants prior to infiltrating soils and contaminating ground water. Furthermore, all pits shall be lined and all wastes associated with construction and drilling (including produced water) will be properly treated and disposed of. The operator will be required to monitor BLM spring 184-04 for water quality and flow rates starting from the first day of drilling until successful interim reclamation (as determined by the BLM) is completed. All access roads and well pads will be designed to “Gold Book” standards (as outlined above) to maintain natural surface water drainage and ground water recharge patterns.
31. Erosion and sediment control measures will be installed on all slopes exceeding five percent to mitigate soil loss. Erosion and sediment control measures will be maintained until stream banks and adjacent upland areas are stabilized.
32. Road speed limits (with the exception of Rio Blanco County Road 24) will be 15 miles per hour to aid in dust abatement and improves overall traffic safety.
33. The sodium lease holders shall be notified by the operator of their plans to drill wells on the RGU 41-8-298 well pad prior to the commencement of surface disturbing activities.
34. To prove ownership of any aquifer contamination or drilling influence, a fluorescent dye other than Rhodamin WT, should be added to all drilling fluids used through the Green River formation while drilling wells on the RGU 41-8-298 well pad.
35. For wells drilled on the RGU 41-8-298 well pad, drilling fluid should be sampled and analyzed for pH and conductivity every 100 feet from surface to 100 feet below the dissolution surface. WPX will document fluid losses during drilling operations through the Green River Formation. The analysis of the fluid samples and fluid loss documentation will be supplied to the BLM Meeker office within 30 days of drilling.

36. The Colorado-One-Call procedures will be implemented before any surface disturbing activities for the pipelines take place.
37. All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed onsite shall be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.
38. The operator will be required to maintain the fences they encounter during the project in working order (e.g., cut fence will be repaired, gates will be closed, cattleguards repaired, and fence laid down will be put up).

The following mitigation also applies to the Proposed Action:

39. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
40. 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 AO. The applicant 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. The applicant, 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.
41. Pursuant to 43 CFR 10.4(g), the applicant 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), the applicant must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
42. The applicant is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
43. If any paleontological resources are discovered as a result of operations under this authorization, the applicant or any of his 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 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.

44. Any excavations into the underlying native sedimentary stone must be monitored by a permitted paleontologist. The monitoring paleontologist must be present before the start of excavations that may impact bedrock.

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: This project on the WRFO's on-line National Environmental Policy Act (NEPA) register on 4/15/2014. No comments or inquiries have been received.

RATIONALE:

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with Section 390 of the Energy Policy Act. Drilling additional wells from the existing well pad location allows for further development of the oil and gas resource with reduced surface disturbance compared to new locations.

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: 09/25/2014