

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

CATEGORICAL EXCLUSION

NUMBER: DOI-BLM-CO-110-2011-0005-CX

CASEFILE/PROJECT NUMBER: COC25122A, COC56767, COC22923

PROJECT NAME: Red Rock Gathering North Douglas earthen pit reclamation

LEGAL DESCRIPTION: Sixth Principal Meridian, Colorado

T.4S., R102W.,
sec. 3, Lot 7.
T.3S., R103W.,
sec. 31, Lot 5.
T.4S., R103W.,
sec. 21, NE $\frac{1}{4}$ SE,
sec. 22, SW $\frac{1}{4}$ SW $\frac{1}{4}$.
sec. 27, SW $\frac{1}{4}$ SW $\frac{1}{4}$.
T.5S., R103W.,
sec. 2, SE $\frac{1}{4}$ NW $\frac{1}{4}$.

APPLICANT: Red Rock Gathering Company, LLC

DESCRIPTION OF PROPOSED ACTION:

Red Rock Gathering Company, LLC has requested authorization for remediation of six earthen pits associated with existing natural gas pipelines. Due to budgeting considerations and timing during the preferred construction seasons, this ongoing project has been divided into phases; this project is Phase 3. Phase 1 consisted of the remediation of 12 locations and Phase 2 was soil remediation at the North Douglas treatment cell. The hydrocarbon levels could not be reduced in the timeframe allowed by the State, so the soil was disposed of at Lapoint Disposal in Utah. After these six sites below are remediated, Red Rock does not expect to identify any other locations.

Location	COC#	Legal	GIS
43-21 Drip GPS	COC-025122	T-4-S, R-103-W, sec 21	N39.694419, W108.955552
4-22 Drip	COC-025122	T-4-S, R-103-W, sec 22	N39.691385 W108.948099
D&G CDM	COC-025122	T-4-S, R-103-W, sec 27	N39.676 * W108.95*
Mid Mnt. Drip Tank	COC-025122	T-5-S, R-103-W, sec	N39.656062,

		2	W108.926547
White Face Buttes Tank	COC-056767	T-3-S, R-103-W, sec 30	N39.75* W109.0051*
1-3 Drip	COC-22923	T-4-S, R-102-W, sec 3	N39.733693, W108.834722

*These GPS points match the legal description and locations provided for the cultural report mapping.

Red Rock has contracted a cultural survey and a report has been received by WRFO.

Red Rock has contracted a third party contractor to test all pits for hydrocarbon levels. The tests will be conducted using hand tools. The sample results will determine which pits can be closed or if further remediation is required. Pit samples above the state limit will be tested to profile the extent of the affected area.

The neutral pits will be closed by hauling in fill dirt and top soil from a land farm location by a third party contractor. It is anticipated that all excavation will be within Red Rock's existing ROW. Once the pit has been determined to be hydrocarbon clear, using Colorado Oil and Gas Conservation Commission (COGCGC) standards, the pit will be filled with fill dirt, the disturbed area will be returned to final grade, as close as possible to the original contours, top soil will be incorporated into this process. The disturbed area would be broadcast seeded and harrowed upon completion of construction with seed mixes shown below from the WRFO reclamation protocol. Red Rock would follow all required conditions for this process. Red Rock will also be responsible for monitoring and controlling noxious weeds until re-vegetation is established back to state standards of 80% vegetation. If there is any potential for erosion on any of these sites, erosion control will be implemented.

Any pit requiring remediation will be handled by land farming the soil off site (private lands) in lined land farms. The bioremediation sites will be tested to establish a base line then treated to achieve state limits. Routine testing and management of the farms will take place until the soil limits are acceptable to state standards. BLM, Red Rock, and COGCGC have agreed to the following process:

- Red Rock has accumulated 425 yards of hydrocarbon impacted soil at the North Douglas Station. This material emits less than 2 tons of VOCs so the CDPHE APEN is not required.
- Hydrocarbon impacted soil will be treated via bioremediation until soil satisfies COGCC Table 910-1
- Upon successful remediation a COGCC Form 4 will be completed and submitted to COGCC for approval.
- Remediated soil will be used to fill in old open flare pit at North Douglas Station.
- Remediation site will not be used for more than 3 years, therefore it is not required to be permitted via Form 28 as a centralized E&P waste management facility.
- Soils will be sampled to ensure compliance with COGCC Table 901-1 standards and data will be submitted to COGCC.
- There is sufficient room at the facility to accommodate soils from the 12 current locations as well as the 6 additional locations.

- It is anticipated that the existing soils at the facility will be remediated to below the COGCC Table 910-1 standards within 30-40 days after initial treatment.

If excavation is required outside of Red Rock’s ROW, excavation will stop; the BLM will be notified and clean-up will continue after receipt of BLM Approval for work outside Red Rock’s permanent 30 ft ROW.

Construction would begin as soon as the proposal is approved. Each remediation will take 1 to 2 days per site depending on how the sampling goes. Construction would require approximately 6 workers to be on site. Construction equipment would include a backhoe, pickup trucks, and a dump truck.

All waste material will be hauled and property disposed of in accordance with Federal, State, and local regulations. No waste or unused materials will be disposed of on site.

The proponent shall provide a copy of the process used by the contractor for soil sampling and a report of the lab test results indicating that the site is free of hydrocarbon contamination.

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with (43 CFR 1610.5-3, BLM 1601.08) 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 2-49 thru 2-52

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

CATEGORICAL EXCLUSION REVIEW: The Proposed Action qualifies as a categorical exclusion under 516 DM 11.9, E13: *Amendments to existing right-of-way such as upgrading of existing facilities which entail no additional disturbance outside the rights-of-way boundary.*

The Proposed Action has been reviewed with the list of extraordinary circumstances (43 CFR 46.215) described in the table below.

Extraordinary Circumstance	YES	NO
a) Have significant adverse effects on public health and safety.		X
b) Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers;		X

Extraordinary Circumstance	YES	NO
prime farmlands; wetlands; floodplains; national monuments; migratory birds; and other ecologically significant or critical areas.		
c) Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources.		X
d) Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.		X
e) Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.		X
f) Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.		X
g) Have significant impacts on properties listed, or eligible for listing, in the National Register of Historic Places as determined by the bureau.		X
h) Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have adverse effects on designated Critical Habitat for these species.		X
i) Violate a Federal law, or a State, local or tribal law or requirement imposed for the protection of the environment.		X
j) Have a disproportionately high and adverse effect on low income or minority populations.		X
k) Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly affect the physical integrity of such sacred sites.		X
l) Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species.		X

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on 10/26/2010. 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	Cultural Resources, Native American Religious Concerns	3/9/2011
Ed Hollowed	Wildlife Biologist	Special Status Wildlife Species	12/16/2010
Matt Dupire	Ecologist	Special Status Plant Species	6/27/2014
Aaron Grimes	Outdoor Recreation Planner	Lands with Wilderness Characteristics	6/24/2014

REMARKS:

Cultural Resources: White Face Butte Drip Tank: The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2001 Compliance Dated 10/12/2010) and no cultural resources have been identified in the project area.

43-21 Drip: The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2001 Compliance Dated 10/12/2010) and no cultural resources have been identified in the project area.

4-22 Drip: The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2001 Compliance Dated 10/12/2010) and no cultural resources have been identified in the project area.

D&G CDM (Center pit and Tank Removal): The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2001 Compliance Dated 10/12/2010) and no cultural resources have been identified in the project area.

Mid Mountain Drip Tank: The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2001 Compliance Dated 10/12/2010) and no cultural resources have been identified in the project area.

1-3 drip: The proposed drip reclamation area has been inventoried at the Class III (100% pedestrian) level (Conner and Davenport 2010 Compliance Dated 10/12/2010). The inventory identified a portion of a historic brush fence (5RB.6634, which is outside of the project area and should not be affected by the pit reclamation project.

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.

Special Status Wildlife Species: No wildlife-related issues or concerns.

Special Status Plant Species: No special status plants issues or concerns

Lands with Wilderness Characteristics: Both the White Face Butte Drip pit and the 1-3 Drip pit are located within, or immediately adjacent to, areas that has been identified as Lands with Wilderness Characteristics. However, the Proposed Action is focused on remediation and reclaiming these sites back to a more naturalized condition and enhances the naturalness of these areas. Therefore no long-term concerns with LWCs are anticipated.

REFERENCES CITED:

Conner, Carl E., and Barbara Davenport
2010 Class III Cultural Resource inventory Report for Six Proposed Reclamation Areas in Rio Blanco County, Colorado for ETC Canyon Pipeline, LLC. Grand River Institute, Grand Junction, Colorado. #10-11-23

MITIGATION:

1. The holder 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.
2. 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 holder 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 holder, 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.
3. Pursuant to 43 CFR 10.4(g), the holder 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 holder must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
4. The following seed mixes are recommended for use at each of the following sites:
 - 43-21, 4-22, D&G CDM, and White Face Butte Tanks will be seeded using seed mix 3 from the WRFO reclamation protocol.

SEED MIX 3 FROM THE WRFO RECLAMATION PROTOCOL			
VARIETY	COMMON NAME	SCIENTIFIC NAME	DRILLED LBS/ACRE
Rosana	Western Wheatgrass	<i>Pascopyrum smithii</i>	4
Whitmar	Bluebunch Wheatgrass	<i>Pseudoroegneria spicata</i>	3.5
Rimrock	Indian Ricegrass	<i>Achnatherum hymenoides</i>	3
	Needle and Thread	<i>Hesperostipa comata</i>	2.5

Maple Grove	Lewis Flax	<i>Linum Lewisii</i>	1
	Scarlet Globemallow	<i>Sphaeralcea coccinea</i>	0.5

- Mid Mtn Drip Tanks will be seeded with seed mix 2 from the WRFO reclamation protocol

SEED MIX 2 FROM THE WRFO RECLAMATION PROTOCOL			
VARIETY	COMMON NAME	SCIENTIFIC NAME	DRILLED LBS/ACRE
Rosana	Western Wheatgrass	<i>Pascopyrum smithii</i>	4
Whitmar	Bluebunch Wheatgrass	<i>Pseudoroegneria spicata</i>	4
Rimrock	Indian Ricegrass	<i>Achnatherum hymenoides</i>	3.5
Lodorm	Green Needlegrass	<i>Nassella viridula</i>	2.5
Timp	Northern Sweetvetch	<i>Hedysarum boreale</i>	3
	Sulphur Flower	<i>Eriogonum umbellatum</i>	1.5

- 1-3 Drip will be seeded with seed mix 5 from the reclamation protocol.

SEED MIX 5 FROM THE WRFO RECLAMATION PROTOCOL			
VARIETY	COMMON NAME	SCIENTIFIC NAME	DRILLED LBS/ACRE
Magnar	Basin Wildrye	<i>Leymus cinereus</i>	3.5
Rosana	Western Wheatgrass	<i>Pascopyrum smithii</i>	3.5
San Luis	Slender Wheatgrass	<i>Elymus trachycaulus</i>	3
Critana	Thickspike Wheatgrass	<i>Elymus lanceolatus</i>	3
Timp	Northern Sweetvetch	<i>Hedysarum boreale</i>	4.5
Maple Grove	Lewis Flax	<i>Linum Lewisii</i>	1

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

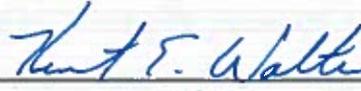
NAME OF PREPARER: Janet Doll

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 516 DM 11.9, E-13. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 43 CFR 46.215 apply.

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

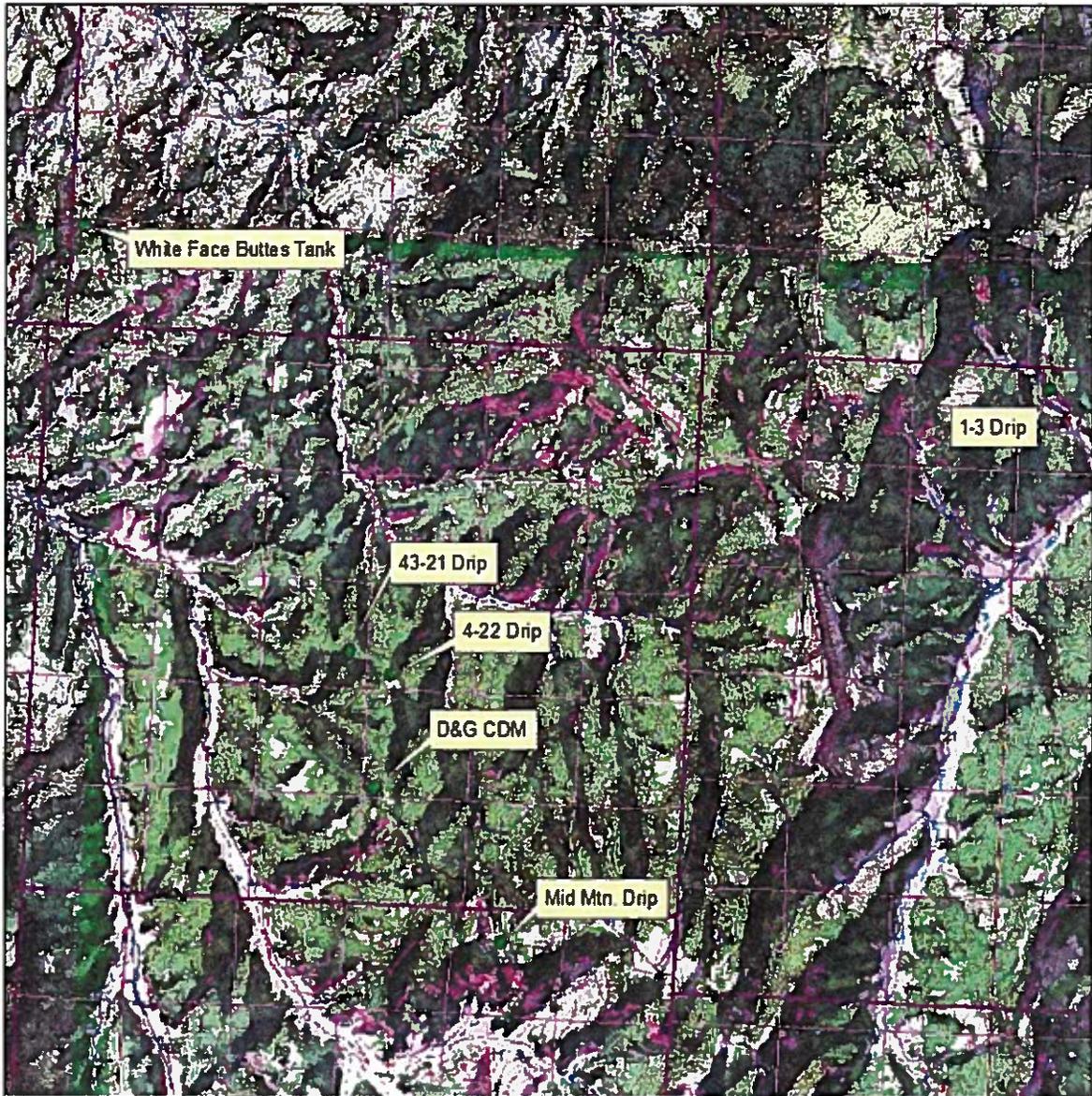
DATE SIGNED:

07/01/2014

ATTACHMENTS:

Map, Exhibit A

Red Rock North Douglas earthen pit reclamation



0 0.5 1 2 Miles

Sources:
BLM, USGS, CDON, etc.

Disclaimer:
Although the data presented herein is the best available, and the map has been prepared using the best available data, no warranty is expressed or implied by BLM regarding the use of this map or the data represented, nor does the act of distribution constitute or imply any such warranty.

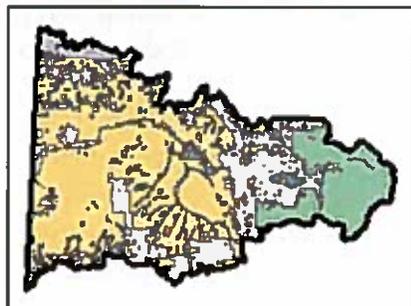


Exhibit A

**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: Red Rock Gathering Earthen Pit Reclamation

CATEGORICAL EXCLUSION NUMBER: DOI-BLM-CO-110-2011-0005-CX

DECISION

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-110-2011-0005-CX, authorizing the remediation of six earthen pits associated with existing natural gas pipelines.

Mitigation Measures

1. The holder 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.
2. 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 holder 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 holder, 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.
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from the WRFO reclamation protocol.

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	Needle and Thread	<i>Hesperostipa comata</i>	2.5
Maple Grove	Lewis Flax	<i>Linum Lewisii</i>	1
	Scarlet Globemallow	<i>Sphaeralcea coccinea</i>	0.5

- Mid Mtn Drip Tanks will be seeded with seed mix 2 from the WRFO reclamation protocol

SEED MIX 2 FROM THE WRFO RECLAMATION PROTOCOL			
VARIETY	COMMON NAME	SCIENTIFIC NAME	DRILLED LBS/ACRE
Rosana	Western Wheatgrass	<i>Pascopyrum smithii</i>	4
Whitmar	Bluebunch Wheatgrass	<i>Pseudoroegneria spicata</i>	4
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- 1-3 Drip will be seeded with seed mix 5 from the reclamation protocol.

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Maple Grove	Lewis Flax	<i>Linum Lewisii</i>	1

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

The BLM informed the public about this project by listing it on the online WRFO NEPA Register on 10/26/2010 and a copy of the completed Categorical Exclusion will be posted on the WRFO website.

RATIONALE

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E13. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 43 CFR 46.215 apply.

ADMINISTRATIVE REMEDIES

This decision shall take effect immediately upon the date it is signed by the Authorized Officer and shall remain in effect while any appeal is pending unless the Interior Board of Land Appeals issues a stay (43 CFR 2801.10(b)). Any appeal of this decision must follow the procedures set forth in 43 CFR Part 4. Within 30 days of the decision, a Notice of Appeal must be filed in the office of the Authorized Officer at White River Field Office, 220 East Market St., Meeker, CO 81641 with copies sent to the Regional Solicitor, Rocky Mountain Region, 755 Parfet St., Suite 151, Lakewood, CO 80215, and to the Department of the Interior, Board of Land Appeals, 801 North Quincy St., MS300-QC, Arlington, VA, 22203. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals at the above address within 30 days after the Notice of Appeal is filed with the Authorized Officer.

SIGNATURE OF AUTHORIZED OFFICIAL:



Field Manager

DATE SIGNED:

07/01/2014