

FINDING OF NO SIGNIFICANT IMPACT/DECISION RECORD

FINDING OF NO SIGNIFICANT IMPACT

Based on the analysis of potential environmental impacts contained in the attached environmental assessment (EA), I have determined that the proposed action will not have any significant impacts on the human environment and an environmental impact statement (EIS) is not required.

Grace Guess (acting for)
Bruce Dawson
Field Manager

12-18-14
Date

DECISION RECORD

It is my decision to authorize the offer to lease for Oil and Gas the proposed tract located in St. Mary Parish, Louisiana Meridian, Louisiana with the following legal description: T16S, R13E, Sec. 23, Lots 7 and 8, Louisiana Meridian, St. Mary Parish, Louisiana (19.88 acres).

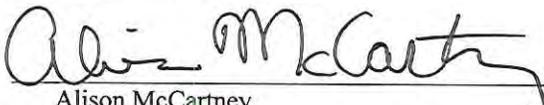
Rationale for Decision

The decision to allow the proposed action does not result in any undue or unnecessary environmental degradation and is consistent with the laws and regulations of the federal, state, or local government. The proposed action was subject to a 30-day public review.

Elena Fink, DSD, Natural Resources

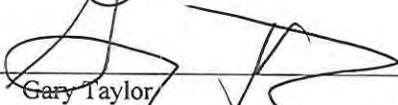
Date

Preparers and Reviewers

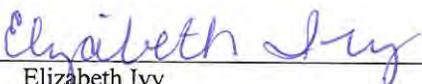
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Environmental Assessment ES-020-2015-5

EOI #1734, St. Mary Parish, Louisiana Lease EA

Prepared by: Alison McCartney
Date: December 14, 2014

CH 1 – PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.0 Introduction

The Bureau of Land Management (BLM) Southeastern States Field Office (SSFO) received a request from the BLM Eastern States Office on October 17, 2014 for a National Environmental Policy Act (NEPA) analysis report on an Expression of Interest (EOI); EOI #1734. EOI #1734 consists of 19.88 acres of land with the following legal description: T16S, R13E, Sec. 23, Lots 7 and 8, Louisiana Meridian, St. Mary Parish, Louisiana (Appendix A).

This environmental assessment (EA) is prepared to address the proposed federal oil and gas lease nomination in St. Mary Parish, Louisiana. A federal oil and gas lease is a legal contract that grants exclusive rights to the lessee to develop federally owned oil and gas resources.

1.1 Need for the Proposed Action

The purpose of the proposed action is to make available for lease 19.88 acres in St. Mary Parish, Louisiana to provide exclusive rights to the lessee to develop federally owned oil and gas resources. The development of oil and natural gas is essential to meeting the nation's future needs for energy. Private exploration and development of federal oil and gas reserves are integral to the BLM's oil and gas leasing programs under the authority of the Mineral Leasing Act (MLA) of 1920, as amended, the MLA for Acquired Lands of 1947, as amended, the Federal Land Policy and Management Act of 1976 and the Energy Policy Act of 2005. The oil and gas leasing program managed by the BLM encourages the development of domestic oil and gas reserves and reduction of U.S. dependence on foreign sources of energy.

1.2 Management Objectives of the Action

The objective of the proposed action is to make available for lease 19.88 acres in St. Mary Parish, Louisiana to provide exclusive rights to the lessee to develop federally owned oil and gas resources. Not approving this EOI would deny the option for industry to develop federal minerals in this area which could create a loss of royalties to the federal government.

1.3 Land Use Plan Conformance

The proposed action does not conflict with any known state or local planning, ordinance or zoning. This area is not covered by a BLM Resource Management Plan. According to the regulations at 43 CFR 1610.8 (b) (1), however, this environmental assessment will be used as a basis for making a decision on the proposal.

1.4 Applicable Regulatory Requirements and Required Coordination

Applicable regulatory requirements and required coordination for lease development of federal oil and gas minerals is authorized by several statutes including: The MLA, as amended and supplemented (30 U.S.C. 181), The MLA of 1947, as amended (30 U.S.C. 351-359), The National Historic Preservation Act, The American Indian Religious Freedom Act, The Native

American Graves Protection and Repatriation Act, The Endangered Species Act (ESA), The Federal Onshore Oil and Gas Leasing Reform Act (FOOGLA), Executive Order (EO) 13007, and/or other statutes and EOs. Consultation with the Louisiana State Historic Preservation Officer (SHPO) and informal consultation with U.S. Fish and Wildlife Service (FWS), Louisiana Ecological Services was conducted and their responses are located in Appendix C.

1.5 Scoping and Public Involvement

1.5.1 Internal Scoping

In October, 2014, a BLM interdisciplinary (ID) team was formed which included a Natural Resource Specialist, Geologist, GIS Specialist, and Archeologist. The ID team began analyzing all relevant data regarding EOI #1734 and writing portions of the EA. The final EA was reviewed by all members of the ID team with comments made and incorporated.

1.5.2 External Scoping

Informal consultation with FWS was initiated on November 20, 2014 in compliance of the ESA, Section 7 Consultation requirements. A concurrence letter was received on December 8, 2014 and is located in Appendix C. A request was submitted to the Louisiana Natural Heritage Program (LNHP) on November 12, 2014 to review their files for records indicating the occurrence of rare plants and animals, outstanding natural communities, natural or scenic rivers, or other elements of special concern within or near the proposed parcels. A response was received on November 20, 2014. Consultation with the SHPO occurred on November 17, 2014. A concurrence letter was received on December 20, 2014 (Appendix C). Letters were sent to various tribes on November 17, 2014 notifying them of the proposed action and requesting comments or concerns. No response was received.

The following tribes were contacted to notify them of the proposed action and to request comments or concerns (Appendix C):

Tunica-Biloxi Tribe of Louisiana
Alabama Coushatta Tribe of Texas
Coushatta Indian Tribe
Chitimacha Tribe of Louisiana
Caddo Nation of Oklahoma
Kialagee Tribal Town
Alabama-Quassarte Tribal Town
Choctaw Nation of Oklahoma
Jena Band of Choctaw
Mississippi Band of Choctaw Indians
Thlopthlocco Tribal Town

The following state and/or federal agencies were contacted by the BLM ID team:

- FWS
- Louisiana SHPO

- LNHP

1.5.3 Public Involvement

The proposed lease was subject to public review for a 30-day period per publication of a newspaper of local distribution (Appendix E).

1.6 Decision(s) That Must Be Made

There are two decisions under consideration from the BLM for the proposed action. The first is to offer the federal oil and gas mineral estate for competitive leasing. The other decision would be to deny the action so that no development or surface disturbance would take place. BLM's policy is to promote oil and gas development as long as it meets the guidelines and regulations set forth by NEPA and other subsequent laws and policies passed by the U.S. Congress.

1.7 Leasing

Analysis as required by NEPA was conducted by SSFO specialists who relied on personal knowledge of the areas involved and reviewed existing databases and file information. It is unknown when, where or if future well sites or roads might be proposed. Detailed site-specific analysis of individual wells or roads would occur when a lease holder submits an Application for Permit to Drill (APD).

CH 2 – PROPOSED ACTION

2.0 Proposed Action

The proposed action is to lease 19.88 acres of federal minerals located in St. Mary Parish, Louisiana (Appendix A). Once sold and a lease issued, the lease purchaser has the right to use so much of the leased lands as is reasonably necessary to explore and drill for all of the oil and gas within the lease boundaries, subject to the stipulations attached to the lease (Title 43 CFR 3101.1-4). Oil and gas leases are issued for a 10-year period and continue for as long thereafter as oil or gas is produced in paying quantities. If a lessee fails to produce oil and gas, does not make annual rental payments, does not comply with the terms and conditions of the lease, or relinquishes the lease, ownership of the minerals leased revert back to the federal government and may be leased again.

The proposed lease would give the lessee exclusive rights to explore and develop oil and gas reserves on the lease, but does not in itself authorize surface disturbing activities. Although there is no surface disturbance at this leasing stage, the BLM NEPA analysis is conducted with the consideration that there may be disturbance in the future as a result of the initial action. As a result, the NEPA analysis for this lease addresses potential effects from drilling, based on reasonably foreseeable development (RFD), although specific drilling activity is not authorized at this leasing stage. Before a lease owner or operator conducts any surface disturbing activities related to the development of this lease, BLM must first approve an APD as specified in Title 43 CFR 3162.

Upon receipt of an APD, BLM conducts an onsite inspection with the company, and when possible the private land owner or surface managing agency. NEPA and the ESA requirements must also be met at the APD stage and in those cases where there is the potential to affect federal or state-listed species, a site specific biological assessment is written, including the results of any biological surveys that may be indicated. This is submitted to FWS and/or the state wildlife agency for consultation and coordination, as appropriate. The lessee is required, as per lease stipulations, to comply with the recommendations of these consultations.

The RFD for EOI # 1734 predicts that multiple federal wells may be drilled from an existing pad. An existing pad is located 0.14 miles east of the proposed parcel. The total disturbance predicted would be 4.02 acres, with 3.67 acres disturbed for the well pad and pit, 0.69 acres for the access road, and 0.34 acres reclaimed. (Appendix D). If development occurs for this lease, wells would likely be drilled from a nearby existing pad in which case the predicated disturbance has already occurred and there would be no additional disturbance. Development could potentially occur however in the southern quarter of the proposed lease site.

If the proposed lease is developed, wells would likely be drilled from an already existing well pad located 0.14 miles east of the lease. Typically, after approval of an APD, the petroleum industry follows a general plan and process for drill sites, as follows:

The excavation reserve pit is usually about five feet deep and is lined with bentonite clay to retain drilling fluids, circulated mud, and cuttings. Plastic or butyl liners (or its equivalent), that

meet state standards for thickness and quality, are used on occasions when soils are determined incapable of holding pit fluids.

Drilling usually continues around the clock. Once drilling is completed, excess fluids are pumped out of the pit and disposed of in a state authorized disposal site and the cuttings are buried. Wells would be drilled by rotary drilling using mud as the circulating medium. Mud pumps would be used to force mud down the drillpipe, thereby forcing the rock cuttings out the wellbore. Water would normally be from a well drilled on the site, however, water could be pumped to the site from a local pond, stream or lake through a pipe laid on the surface. Approximately 1500 barrels of drilling mud would be typically kept on the location. If a tract is adjacent to a producing field and water production will be expected during the life of the field, separation, dehydration and other production processing may be necessary. Construction of facilities off the federal lease may be needed to handle this processing. Some processing or temporary storage may be necessary on site.

If the well is successful, the drill pad would be reduced to about 100' x 100' with the remaining surface area, including the reserve pit, re-graded and restored as per the BLM and surface owner requirements. A lease notice for the proposed lease encourages the use of non-invasive cover plants during all restoration and stabilization activities. Final seed mixtures and plantings are determined with recommendations from BLM with approval of the land owner. The remaining 100' x 100' pad is maintained for the life of the well. The life of a productive well may be 25 years. Following abandonment, the pad is subject to the same restoration parameters.

The following information on the federal mineral tract is based on information collected during site visits conducted in 2014, aerial photographs, and topographic maps. Mitigation methods for potential negative impacts are listed in Appendix B as lease stipulations and lease notices. These recommended lease stipulations and notices have been developed to provide general habitat protection and setbacks to exclude sensitive habitats from oil and gas development. Recommended mitigation for the proposed action is suggested as stipulations for cultural resources and tribal consultations, endangered species and special plant species (Appendix B). Additional surveys may be required for special status species after site-specific proposals have been received by BLM during the development phase.

2.1 No Action Alternative

Under the No Action alternative, surface management would remain the same. Ongoing oil and gas development, however, would continue on surrounding federal, private, and state leases, with the possibility of drainage from these adjacent wells.

It is not expected that demand for energy oil and gas will go down, and a decision to not lease the proposed federal minerals would not prevent future leasing in these areas provided it is consistent with land use planning decisions, and subject to appropriate stipulations. Therefore, it is anticipated that these parcels may be nominated and leased at a future date.

CH. 3 – DESCRIPTION OF THE AFFECTED ENVIRONMENT

3.0 Introduction

This section describes the environment that would be affected by implementation of the Proposed Action described in Chapter 2. Aspects of the affected environment described in this section focus on the relevant resources and issues. Only those elements of the affected environment that have the potential to be significantly impacted are described in detail.

Based on review of environmental elements and consideration of the Purpose and Need statement prepared for this EA, the following elements will be addressed in this EA: Environmental Justice, Cultural Resources and Native American Concerns, Minerals and Mineral Development, Wastes, Soils, Air Resources, Water Resources - Surface/Ground, Floodplains/Riparian Areas/Wetlands, Invasive/Exotic Species, Special Status Species, Wildlife and Vegetation, and Migratory Birds of Concern.

3.1 Description of Project Area

EOI #1734 consists of 19.88 acres and is located within the small unincorporated town of Amelia ~ 5 miles east of Morgan City. Approximately 75% of the acreage is developed and contains, roads, houses, and businesses. Old Highway 90 runs through the northern portion of the tract. Bayou Boeuf is located ~ 0.25 miles east of the tract. A road, multiple buildings, and cleared areas are located between the Bayou and the proposed parcel. Approximately 25% of the tract is wooded with the following dominant tree species: laurel oak (*Quercus laurifolia*), willow oak (*Q. phellos*), northern oak (*Q. rubra*), sweetbay (*Magnolia virginiana*), mockernut hickory (*Carya tomentosa*), and water oak (*Q. nigra*).

3.2 Environmental Justice

Title IV of the Civil Rights Act of 1964 and related statutes ensure that individuals are not excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal assistance on the basis of race, color, national origin, age, sex, or disability. EO 12898 on Environmental Justice directs that programs, policies, and activities not have a disproportionately high and adverse human health and environmental effect on minority and low-income populations.

According to The U.S. Census Bureau (USCB), 21.3% of people located in Morgan City, Louisiana lived below the poverty level from 2009 – 2013 (USCB 2014). This is a higher percentage than the state as a whole (19.1%). Oil and gas development in southeast Louisiana would have impacts on employment and associated income, payments in lieu of taxes to the parishes, population numbers, and lifestyles.

3.3 Cultural Resources and Native American Concerns

3.3.1 Cultural Resources

A cultural resource is a broad term that refers to areas of traditional significance, use and the remains of past and current human activity. These resources may be the physical remains of a prehistoric or historic archeological site or a place of traditional cultural significance or use. A Traditional Cultural Property (TCP) refers to the connection between places on the landscape and a group's traditional beliefs, religion, or cultural practice. Because cultural resources are nonrenewable and easily damaged, laws and regulations exist to help protect them.

The National Historic Preservation Act (NHPA), as amended, and its implementing regulations require that federal agencies consider the effects of their undertakings on "historic properties." 492 FS0026863. The term "historic properties" refers to cultural properties, both prehistoric and historic, that are eligible for listing in the National Register of Historic Places (NRHP). The lands, resources, and archeological sites in southeast Louisiana are considered traditionally significant to all affiliated American Indian Tribes and, in some cases, certain resources or areas are considered sacred to a specific Tribe(s). These traditional sacred places and traditional use areas are considered cultural historic properties that may be eligible for the NRHP, because of their association with cultural practices and beliefs rooted in history and their importance in maintaining the cultural identity of ongoing American Indian communities. Consultations about these uses and places are governed and/or mandated by the NHPA, as amended in 1992 (U.S.C. 470 et seq.), the American Indian Religious Freedom Act of 1978 (42 U.S.C. 1996), the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001 et seq.) and EOs 13007, 13175, 13084, and 13647. Federal agencies consider the effects of their management activities on historic properties by first determining the area of potential effect, then conducting literature searches and field surveys to locate cultural properties. Additionally, they consult with American Indian Tribes and other interested parties to determine whether TCPs are within the area of potential effect.

All historic and archeological sites that are eligible or potentially eligible for listing in the NRHP would be either avoided by the proposed undertaking or have the information in the sites extracted through data recovery prior to subsurface disturbance.

A review of the Louisiana Division of Archaeology site files shows sites within one mile of the proposed lease site. The lease area may have sites that would qualify as historic properties (36 CFR 61). Professionally conducted surveys for historic properties and cultural resources would be required before any ground disturbing activities take place. This information would enhance our understanding of human land use utilization in prehistoric Louisiana.

3.3.2 Native American Concerns

Federally recognized Native Americans have been contacted about this proposed undertaking. However, currently, there are no known sites for religious purposes, Sacred Sites or TCPs identified by Native Americans on the lease tract. If any such sites are present, access would be by an agreement between the surface owner and those Native Tribal groups. The BLM has no

authority over access. The BLM's responsibility is limited to the subsurface disturbance, if or when a proposal for development is submitted.

3.4 Minerals and Mineral Development

3.4.1 Minerals

The objective horizons are multiple Miocene sands down to 21,000 feet. The commodity is both oil and natural gas.

3.4.2 Mineral Development

Wells will be drilled vertically to a certain depth referred to as the kick-off point. From there the wells are steered from the vertical to the horizontal using a short, medium, or long radius curve. A horizontal lateral is then drilled in the objective horizon for a distance of between 4,000 and 9,000 feet. These wells would not require high volume hydraulic stimulation/fracturing in order to establish commercial production. Hydraulic stimulation is a process of drilling deep into the ground and injecting water, sand, and other chemicals, in order to fracture rock and allow gas, petroleum, and coal seam gas to flow up the well and be harnessed for energy.

The subject parcel does not contain any existing features related to energy development, production, supply or distribution including plugged or unplugged oil and gas wells.

3.5 Wastes

The Resource Conservation and Recovery Act (RCRA) of 1976 established a comprehensive program for managing hazardous wastes from the time they are produced until their disposal. The Environmental Protection Agency (EPA) regulations define solid wastes as any "discarded materials" subject to a number of exclusions. On January 6, 1988, EPA determined that oil and gas exploration, development and production wastes would not be regulated as hazardous wastes under the RCRA. The Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, deals with the release (spillage, leaking dumping, accumulation, etc.), or threat of release of hazardous substances into the environment. Despite many oil and gas constituent wastes being exempt from hazardous waste regulations, certain RCRA exempt contaminants could be subject to regulations as a hazardous substance under CERCLA.

No hazardous or solid waste disposal sites are known to exist on the lease tract. Should the lease parcel be developed, generation and temporary storage of waste materials (solid and liquid) would likely occur. Waste materials would be managed in accordance with Onshore Orders 1 & 7, RCRA, applicable Louisiana Department of Environmental Quality (LDEQ) regulations, and Louisiana Department of Natural Resources rules. Fluid handling would be evaluated at the development stage and fluids associated with any subsequent drilling, completions and/or production would either be treated, evaporated, or transferred to an approved LDEQ treatment facility. Solids would be treated on site or transferred to a LDEQ approved facility.

3.6 Soils

Louisiana is generally considered typical coastal plain. The soil characteristics, potential for erosion, and likelihood for success in revegetation efforts are important to consider when planning for stabilization of disturbed areas. Oil and gas activities may affect soil chemical and physical properties causing increases in compaction, displacement, erosion, and sedimentation. Erosion and sedimentation can be quantified by measuring or by estimating tons per acre of soil loss. The comparison of soil loss tolerance (maximum rate of soil loss that can occur while sustaining productivity) to current soil loss (the rate of soil loss occurring under existing conditions) is important in describing current conditions. When current soil loss is greater than the tolerance threshold, erosion can be considered excessive. Other factors to be considered when determining whether soil erosion is too high, include the quality of the downstream water bodies and their reasons for impairment.

Two soil types can be found on this parcel; Harahan clay, which is found on 46% of the lease parcel and Schriver clay, 0-1% slopes, which is found on 54% of the parcel. Harahan clay is found on backswamps and has a parent material of nonfluid over fluid clayey alluvium. It is poorly drained and contains a high available water storage in profile (about 10.5 in). Schriver clay is found on backswamps and has a parent material of clayey alluvium. It is poorly drained with a moderate available water storage in profile (~7.7 in.).

3.7 Air Resources

3.7.1 Air Quality

In the general area of the parcel, the primary sources of air pollution are dust from blowing wind on disturbed or exposed soil, exhaust emissions from motorized equipment, oil and gas development, agriculture, and industrial sources. The EPA was given the authority for air quality protection with the provision to delegate this authority to the state as appropriate under U.S. law. The LDEQ has been delegated most of the authority for air quality protection in Louisiana. The Clean Air Act (CAA) of 1970, as amended, requires the establishment of National Ambient Air Quality Standards (NAAQS). NAAQS pollutants include carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM₁₀ & PM_{2.5}), sulfur dioxide (SO₂), and lead (Pb). The NAAQS pollutants are monitored in Louisiana by the LDEQ. The CAA identifies two types of national ambient air quality standards. Primary standards define levels of air quality that the Administrator of the EPA judges to be necessary, with an adequate margin of safety, to protect the public health. Secondary standards define levels of air quality that the Administrator of the EPA judges to be necessary to protect the public from any known or anticipated adverse effects of a pollutant. Both primary and secondary standards are currently in effect (Table 1).

Table 1. National Ambient Air Quality Standards.

Pollutant	Primary Standards		Secondary Standards	
	Level	Averaging Time	Level	Averaging Time
Carbon Monoxide	9 ppm (10 mg/m ³)	8-hour ⁽¹⁾	None	
	35 ppm	1-hour ⁽¹⁾		

	(40 mg/m ³)			
<u>Lead</u>	0.15 µg/m ³ ⁽²⁾	Rolling 3-Month Average	Same as Primary	
	1.5 µg/m ³	Quarterly Average	Same as Primary	
<u>Nitrogen Dioxide</u>	53 ppb ⁽³⁾	Annual (Arithmetic Average)	Same as Primary	
	100 ppb	1-hour ⁽⁴⁾	None	
<u>Particulate Matter (PM₁₀)</u>	150 µg/m ³	24-hour ⁽⁵⁾	Same as Primary	
<u>Particulate Matter (PM_{2.5})</u>	15.0 µg/m ³	Annual ⁽⁶⁾ (Arithmetic Average)	Same as Primary	
	35 µg/m ³	24-hour ⁽⁷⁾	Same as Primary	
<u>Ozone</u>	0.075 ppm (2008 std)	8-hour ⁽⁸⁾	Same as Primary	
	0.08 ppm (1997 std)	8-hour ⁽⁹⁾	Same as Primary	
	0.12 ppm	1-hour ⁽¹⁰⁾	Same as Primary	
<u>Sulfur Dioxide</u>	0.03 ppm	Annual (Arithmetic Average)	0.5 ppm	3-hour ⁽¹⁾
	0.14 ppm	24-hour ⁽¹⁾		

Note:

- (1) Not to be exceeded more than once per year.
- (2) Final rule signed October 15, 2008.
- (3) The official level of the annual NO₂ standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.
- (4) To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm (effective January 22, 2010).
- (5) Not to be exceeded more than once per year on average over 3 years.
- (6) To attain this standard, the 3-year average of the weighted annual mean PM_{2.5} concentrations from single or multiple community-oriented monitors must not exceed 15.0 µg/m³.
- (7) To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35 µg/m³ (effective December 17, 2006).
- (8) To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.075 ppm. (effective May 27, 2008).
- (9) To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.08 ppm.
 - (b) The 1997 standard—and the implementation rules for that standard—will remain in place for implementation purposes as EPA undertakes rulemaking to address the transition from the 1997 ozone standard to the 2008 ozone standard.
 - (c) EPA is in the process of reconsidering these standards (set in March 2008).
- (10) EPA revoked the [1-hour ozone standard](#) in all areas, although some areas have continuing obligations under that standard ("anti-backsliding").
 - (b) The standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is ≤ 1.

Ambient air quality measurements taken by LDEQ indicate that ambient air quality for Louisiana is within the standards. In 2011, the EPA granted attainment status for 1-hour ozone for the

following Parishes: Beauregard, Grant, Lafayette, Lafourche, St. James, St. Mary, Jefferson, Orleans, St. Charles, St. Bernard, Point Coupee, and Calcasieu. The EPA also granted attainment status for 8-hour ozone in the Baton Rouge area.

Air quality in a given region can be measured by its Air Quality Index (AQI) value. The AQI is reported according to a 500-point scale for each of the major criteria air pollutants, with the worst denominator determining the ranking. For example, if an area has a CO value of 132 on a given day and all other pollutants are below 50, the AQI for that day would be 132. The AQI scale breaks down into four categories: good (AQI<50), moderate (50-100), unhealthy for sensitive groups (100-150), and unhealthy (>150). The AQI is a national index and the air quality rating is an important indicator for populations sensitive to air quality changes. The proposed lease is located 70 miles south of Baton Rouge. There are 10 air quality monitoring sites in Baton Rouge. The AQI was good on December 16, 2014 for ozone (with the highest AQI being 24) PM₂₅ (29) and SO₂ (1). The proposed lease is located 79 miles west of New Orleans. There are 8 air quality monitoring sites in New Orleans. The AQI was good on December 16, 2014 for ozone (with the highest AQI being 22) PM₂₅ (35) and SO₂ (1).

3.7.1.1 Visibility

Visibility, also referred to as visual range, is a subjective measure of the distance that light or an object can clearly be seen by an observer. Light extinction is used as a measure of visibility and is calculated from the monitored components of fine particle mass (aerosols) and relative humidity. It is expressed in terms of deciviews, a measure for describing perceived changes in visibility. One deciview is defined as a change in visibility that is just perceptible to an average person, which is approximately a 10% change in light extinction. Visibility can also be defined by Standard Visual Range (SVR) measured in miles, which is the farthest distance at which an observer can see a black object viewed against the sky above the horizon. Cleaner air will have a larger SVR. To estimate potential visibility impairment, monitored aerosol concentrations are used to reconstruct visibility conditions for each day monitored. The aerosol species include ammonium sulfate, ammonium nitrate, organic mass, elemental carbon, soil elements, and coarse mass. The daily values are then ranked from clearest to haziest and divided into three categories; the mean visibility for all days (average), the 20% of days with the clearest visibility (20% clearest), and the 20% of days with the worst visibility (20% haziest).

A wide variety of pollutants can impact visibility, including particulate matter, NO₂, nitrates (compounds containing NO₃), and sulfates (compounds containing SO₄). Fine particles suspended in the atmosphere decrease visibility by blocking, reflecting, or absorbing light. Two types of visible impairment can be caused by emission sources: plume impairment and regional haze. Plume impairment occurs when a section of the atmosphere becomes visible due to the contrast or color difference between a discrete pollutant plume and a viewed background, such as a landscape feature. Regional haze occurs when pollutants from widespread emission sources become mixed in the atmosphere and travel long distances.

It is estimated that the average natural background visibility range for the eastern U.S. varies from 65 to 121 miles. Visibility range information is not available for southeast Louisiana.

There are three classifications of areas that attain NAAQS: Class I, Class II, and Class III. Congress established certain national parks and wilderness areas as mandatory Class I areas where only a small amount of air quality degradation is allowed. Since 1980, the Interagency Monitoring of Protected Visual Environments (IMPROVE) network has measured visibility in Class I areas. These are managed as high visual quality under the federal visual resource management (VRM) program. The CAA 1997 amendment declared “as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I federal areas...from manmade air pollution.” 42 U.S.C. § 7491(a)(1).25. All other areas of the U.S. are designated as Class II, which allow a moderate amount of air quality degradation. No areas of the U.S. have been designated Class III, which would allow more air quality degradation. The CAA gives federal managers the affirmative responsibility, but no regulatory authority, to protect air quality-related values, including visibility, from degradation.

Breton Wilderness Area is the only Class I area in Louisiana. This 5,000 acre National Wildlife Refuge (NWR) is an island located in the Gulf of Mexico near Venice, Louisiana. The NWR is located over 146 miles west/northwest of the proposed project site.

Prevention of Significant Deterioration (PSD) increments limit air quality degradation and ensure that areas with clean air continue to meet NAAQS, even during economic development. The PSD program goal is to maintain pristine air quality required to protect public health and welfare from air pollution effects and “to preserve, protect and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreation, scenic or historic value.”

PSD increments have been established for NO₂, SO₂, and PM₁₀. Comparisons of potential PM₁₀, NO₂, and SO₂ concentrations with PSD increments are intended only to evaluate a threshold of concern. The allowable PSD increment depends on an area’s classification. Class I areas have lower increments, due to their protected status as pristine areas. PSD increment data is currently not available for Louisiana.

3.7.1.2 Atmospheric Deposition

Atmospheric deposition refers to processes in which air pollutants are removed from the atmosphere and deposited into terrestrial and aquatic ecosystems. Air pollutants can be deposited by precipitation (rain and snow) or the gravitational settling of gaseous pollutants on soil, water, and vegetation. Much of the concern about deposition is due to secondary formation of acids and other compounds from emitted nitrogen and sulfur species, such as oxides of nitrogen (NO_x) and SO₂, which can contribute to acidification of lakes, streams, and soils and affect other ecosystem characteristics, including nutrient cycling and biological diversity.

Substances deposited include:

- Acids, such as sulfuric (H₂SO₄) and nitric (HNO₃), sometimes referred to as acid rain
- Air toxics, such as pesticides, herbicides, and volatile organic compounds (VOC)

- Heavy metals, such as mercury
- Nutrients, such as NO₃⁻ and ammonium (NH₄⁺)

The accurate measurement of atmospheric deposition is complicated by contributions to deposition by several components including but not limited to rain, snow, cloud water, particle settling, and gaseous pollutants. Deposition varies with precipitation and other meteorological variables (e.g., temperature, humidity, winds, and atmospheric stability), which in turn, vary with elevation and time.

The Forest Service (FS) has established guidelines or Levels of Concern (LOC) for total deposition of nitrogen and sulfur compounds in Class I Wilderness Areas. Total nitrogen deposition of 1.5 kilograms (kg) per hectare (ha) per year or less is considered to be unlikely to harm terrestrial or aquatic ecosystems. For total sulfur deposition, the LOC is 5 kg per ha per year. The FS is considering a sulfur LOC of 1.5 kg per ha per year. Note that these are the same LOCs the National Park Service uses. Breton Wilderness Area is the only Class I area in Louisiana and LOC data is not available for this area.

3.7.2 Climate and Climate Change

3.7.2.1 Climate

The climate in the project areas is considered subtropical. Weather is highly variable. It is affected alternately by flows of cold dry air moving southward and by warm moist air moving northward off the Gulf of Mexico. Transitions from one flow to another frequently bring significant, sometimes abrupt, weather changes. Summer temperatures range from 85° F to 95° F during the afternoon, and 65° F to 75° F in the early morning. The winters are generally mild, and only rarely are there days when the temperature fails to rise above freezing. Average winter temperatures range from 55° F to 65° F in the afternoon, and from 40° F to 50° F in the early morning hours.

Rainfall, mainly in the form of showers, occurs on about 2 of every 7 days throughout the year. The annual rainfall averages about 59 inches. During the rainy season from December to March, the average rainfall is 28 inches. Annual summer precipitation, June through September, is approximately 16 inches. Rainfall is generally brief but intense in summer, with lesser intensities and greater duration during the winter. The measured pH of rainfall in central and northern Louisiana averages 4.8.

Hurricane season is from June through November. Rainfall amounts vary with the storms, ranging from a trace to a record 22 inches for a 3-day period in 1922. Moderate to severe flooding is sometimes associated with these storms (USDA 1999).

Tornadoes can develop any time of the year, but the primary season is from March to May. Their occurrence is most common in April. A second tornado season takes place from November to

January. Intense, localized rainfall is often associated with these storms. March to May is the season when extensive thunderstorms with rainfall amounts exceeding 10 in. per storm is often seen (USDA 1999).

3.7.2.2 Climate Change

Climate change refers to any significant change in measures of climate (e.g., temperature or precipitation) lasting for an extended period (decades or longer). Climate change may result from natural processes, such as changes in the sun's intensity, natural processes within the climate system (such as changes in ocean circulation), and human activities that change the atmosphere's composition (such as burning fossil fuels) and the land surface (such as urbanization) (Intergovernmental Panel on Climate Change [IPCC] 2013).

Greenhouse gases (GHGs) are gases in the atmosphere composed of molecules that absorb and reradiate infrared electromagnetic radiation. When present in the atmosphere the gas contributes to the greenhouse effect. The greenhouse effect is a process by which thermal radiation from a planetary surface is absorbed by atmospheric GHGs and is re-radiated in all directions. Since part of this re-radiation is back towards the surface and the lower atmosphere, it results in an elevation of the average surface temperature above what it would be in the absence of the gases. Some GHGs such as CO₂ occur naturally and are emitted to the atmosphere through natural processes and human activities. Other GHGs (e.g., fluorinated gases) are created and emitted solely through human activities. The primary GHGs that enter the atmosphere as a result of anthropogenic activities include CO₂, CH₄, N₂O, and fluorinated gases such as hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). Fluorinated gases are powerful GHGs that are emitted from a variety of industrial processes including production of refrigeration/cooling systems, foams and aerosols. Fluorinated gases are not primary to the activities authorized by the FS or BLM and will not be discussed further in this document.

Ongoing scientific research has identified the potential impacts of anthropogenic GHG emissions and changes in biological sequestration due to land management activities on global climate. Through complex interactions on a regional and global scale, these GHG emissions and net losses of biological carbon sinks cause a net warming effect of the atmosphere, primarily by decreasing the amount of heat energy radiated by the earth back into space. Although GHG levels have varied for millennia, recent industrialization and burning of fossil carbon sources have caused CO₂ equivalent (CO₂e) concentrations to increase dramatically, and are likely to contribute to overall global climatic changes. CO₂e is the metric measurement used to compare the emissions for various GHGs based upon their global warming potential (GWP). The CO₂e for a gas is derived by multiplying the tons of the gas by the GWP. The IPCC recently concluded that "warming of the climate system is unequivocal" and "most of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic GHG concentrations" (IPCC 2013).

It is important to note that GHGs will have a sustained climatic impact over different temporal scales. For example, recent emissions of CO₂ can influence climate for 100 years. In contrast, black carbon is a relatively short-lived pollutant, as it remains in the atmosphere for only about a

week. It is estimated that black carbon is the second greatest contributor to global climate change behind CO₂ (Ramanathan and Carmichael 2008). Without additional meteorological monitoring systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions, but increasing concentrations of GHGs are likely to accelerate the rate of climate change.

Global mean surface temperatures have increased nearly 1.0°C (1.8°F) from 1890 to 2006 (Goddard Institute for Space Studies 2007). In 2001, the IPCC indicated that by the year 2100, global average surface temperatures would increase 1.4 to 5.8°C (2.5 to 10.4°F) above 1990 levels. The National Academy of Sciences (2006) has confirmed these findings, but also indicated that there are uncertainties regarding how climate change may affect different regions. Observations and predictive models indicate that average temperature changes are likely to be greater in the Northern Hemisphere. Data indicates that northern latitudes (above 24° N) have exhibited temperature increases of nearly 1.2°C (2.1°F) since 1900, with nearly a 1.0°C (1.8°F) increase since 1970 alone. It also shows temperature and precipitation trends for the conterminous U.S. For both parameters we see varying rates of change, but overall increases in both temperature and precipitation.

The lack of scientific tools designed to predict climate change at regional or local scales limits the ability to quantify potential future impacts. However, potential impacts to air quality due to climate change are likely to be varied. Oil and gas development activities can generate CO₂ and CH₄. CO₂ emissions result from the use of combustion engines, while CH₄ can be released during processing and development/production of oil and gas resources. Wild land fires also are a source of other GHG emissions, while livestock grazing is a source of CH₄. Currently, the LDEQ does not have regulations regarding GHG emissions, although these emissions are regulated indirectly by various other regulations.

Because GHGs circulate freely throughout Earth's atmosphere, the planning area for this resource is the entire globe. The largest component of global anthropogenic GHG emissions is CO₂. Global anthropogenic carbon emissions reached about 7,000,000,000 metric tons per year in 2000 and about 9,000,000,000 metric tons per year in 2008 (Boden et al 2010). Oil and gas production is a major contributor of GHGs. In 2006, natural gas production accounted for 8% of global CH₄ emissions, and oil production accounted for 0.5% of global CH₄ emissions (URS Corporation 2010).

3.8 Water Resources - Surface/Ground

3.8.1 Surface Water Resources

Surface water hydrology within the area is typically influenced by geology, soil characteristics, precipitation and vegetation. There are no water bodies located on the proposed parcel however, Bayou Boeuf is located ~ 0.25 miles east of the tract. A road, multiple buildings, and cleared areas are located between the Bayou and the proposed parcel.

Many of Louisiana's water bodies remain impaired for the designated use of fish and wildlife propagation. This is largely because there are many possible causes and sources of impairment

impacting this use, and any one of these causes can result in a water body being considered impaired for fish and wildlife propagation. There are more than 30 different suspected causes of impairment reported as impacting fish and wildlife propagation. The most frequently cited suspected causes of impairment for all water bodies combined in Louisiana are fecal coliforms, primarily from septic tanks and municipal sewage treatment systems, low dissolved oxygen from sewage, agriculture, or natural causes, sediment-related problems such as turbidity, suspended solids, and siltation caused by agriculture, forestry, sewage systems, construction, hydro-modification, resource extraction, or natural processes, and mercury related to fish consumption advisories, due primarily to atmospheric deposition of mercury on the watershed. Many of the suspected sources of water quality impairment are known collectively as nonpoint source pollution because it typically does not come from a single point of discharge but runs across the land when it rains and is carried through small canals and streams to major water bodies (LDEQ 2008). With the exception of mercury, all of the top eight suspected causes of impairment generally can be related to nonpoint sources of pollution. The remaining causes of impairment generally are related to various forms of industry, small business, or municipal sources (LDEQ 2008).

The LADNROC regulates oil and gas operations in Louisiana. The LADNROC has the responsibility to gather oil and gas production data, permit new wells, establish pool rules and oil and gas allowables, issue discharge permits, enforce rules and regulations of the division, monitor underground injection wells, and ensure that abandoned wells are properly plugged and the land is responsibly restored. The Louisiana Environment Department (LAED) administers the major environmental protection laws. The Water Quality Control Commission (WQCC), which is administratively attached to the LAED, assigns responsibility for administering its regulations to constituent agencies, including the LADNROC. The LADNROC administers, through delegation by the WQCC, all Water Quality Act regulations pertaining to surface and groundwater (except sewage not present in a combined waste stream). According to the LADNROC, produced water if predictable in salt concentration, can be used for drilling and completion and possibly cementing.

3.8.2 Ground Water Resources

The results of the LDEQ Baseline Monitoring Program indicate that water quality is good in Louisiana aquifers. Although the overall quality of the state's ground water is good, there are more than 200 sites where active investigation or remediation of contaminated ground water is taking place, not including underground storage tank or Superfund sites. There also were 14 public water supply systems impacted by VOC contamination of ground water between 1989 and 2002 (GWPC 2009).

The lease parcel is located within the Coastal lowlands aquifer system which according to U.S. Geological Service (USGS) Ground Water Atlas of the U.S., "consists of a gulf-ward-thickening, heterogeneous, unconsolidated to poorly consolidated wedge of discontinuous beds of sand, silt, and clay that range in age from Oligocene to Holocene. Major rivers that flow across this system include the Mississippi, the Pearl, and the Red Rivers. Average annual precipitation ranges from 56 in in western Louisiana to 68 in in southeastern Mississippi. The coastal lowlands aquifer system yields large quantities of water for agricultural, public supply, domestic and commercial, and industrial uses (USGS 2014).

Most onshore produced water is injected deep underground for either enhanced recovery or disposal. With the passage of the Safe Drinking Water Act in 1974, the subsurface injection of fluids came under federal regulation. In 1980, the EPA promulgated the Underground Injection Control regulations. The program is designed to protect underground sources of drinking water.

3.8.3 Hydraulic Fracturing

High volume hydro-fracturing will not be required for wells drilled on this lease.

3.9 Floodplains/Riparian Areas/Wetlands

There are no floodplains, riparian areas, or wetlands on this EOI however, Bayou Boeuf is located ~ 0.25 miles east of the tract. A road, multiple buildings, and cleared areas are located between the Bayou and the proposed parcel.

3.10 Invasive/Exotic Species

Noxious weeds can have a disastrous impact on biodiversity and natural ecosystems. Noxious weeds affect native plant species by out-competing native vegetation for light, water and soil nutrients. Noxious weeds cause \$2 to \$3 million in estimated losses to producers annually. These losses are attributed to: 1) decreased quality of agricultural products due to high levels of competition from noxious weeds, 2) decreased quantity of agricultural products due to noxious weed infestations, and 3) costs to control and/or prevent the spread of noxious weeds.

There are a number of non-native species that are considered invasive in Louisiana and are monitored by the Louisiana State University (LSU) Ag Center. Table 2 provides a list of some of the invasive species that can be found in Louisiana:

Table 2. List of invasive species found in Louisiana.

COMMON NAME	SCIENTIFIC NAME
Alligator weed	<i>Alternanthera philoxeroides</i>
Japanese climbing fern	<i>Lygodium japonicum</i>
Chinaberry	<i>Melia azedarach</i>
Johnson grass	<i>Sorghum halepense</i>
Chinese privet	<i>Ligustrum sinense</i>
Japanese honeysuckle	<i>Lonicera japonica</i>
Brazilian verain	<i>Verbena brasiliensis</i>
Cogon grass	<i>Imperata cylindrica</i>
Chinese tallow tree	<i>Triadica sebifera</i>
Common salvinia	<i>Salvinia minima</i>
Hydrilla	<i>Hydrilla verticillata</i>
Mimosa	<i>Albizia julibrissin</i>
Water hyacinth	<i>Eichhorinia crassipes</i>

Source: USDA 2007.

No invasive species were observed during the site visit however, invasive species occurrence is likely. This parcel is highly developed. Surface disturbance is thought to be a major factor for the introduction and establishment of invasive species (Radosevich and Holt 1984). People are known to plant invasive species as ornamentals. In addition, disturbance creates openings in which invasive species can get established, spread, and compete with native species. If the lease is sold and issued and development subsequently is proposed, invasive species would be dealt with prior to initiating any surface disturbing activities to minimize further spread of the plants.

3.11 Special Status Species

3.11.1 Federally Listed Species

Section 7 of the ESA requires that federal agencies prevent or modify any projects authorized, funded, or carried out by the agencies that are “likely to jeopardize the continued existence of any endangered species or threatened species, or result in the destruction or adverse modification of critical habitat of such species.” Table 3 presents the species listed by FWS as endangered, threatened, proposed, or candidate that are documented to occur in St. Mary Parish, Louisiana. The tables also present a summary of BLMs determination regarding anticipated effects on those species from development that might occur from the proposed leases. Specific information regarding habitat requirements and rationale for those determinations are provided below under each species section. Details regarding species habitat, habits, threats and other information has been obtained from the Nature Serve website (www.natureserve.org).

Table 3. Federally listed species in St. Mary Parish, Louisiana.

Species	Federal Status	Determination	Rationale
Louisiana Black Bear (<i>Ursus americanus luteolus</i>)	Threatened	No effect	No suitable habitat
West Indian Manatee (<i>Trichechus manatus</i>)	Endangered	No effect	No suitable habitat
Piping Plover (<i>Charadrius melodus</i>)	Threatened	No effect	No suitable habitat
Red Knot (<i>Calidris canutus</i>)	Proposed	No effect	No suitable habitat
Atlantic Sturgeon (<i>Acipenser oxyrinchus</i>)	Threatened	No effect	No suitable habitat
Pallid Sturgeon (<i>Scaphirhynchus albus</i>)	Endangered	No effect	No suitable habitat
Green Sea Turtle (<i>Chelonia mydas</i>)	Threatened	No effect	No suitable habitat
Hawksbill Sea Turtle (<i>Eretmochelys imbricate</i>)	Endangered	No effect	No suitable habitat
Kemp’s Ridley Sea Turtle (<i>Lepidochelys kempii</i>)	Endangered	No effect	No suitable habitat
Leatherback Sea Turtle (<i>Dermochelys coriacea</i>)	Endangered	No effect	No suitable habitat
Loggerhead Sea Turtle (<i>Caretta caretta</i>)	Threatened	No effect	No suitable habitat

None of these species were observed during the site visit conducted on November 14, 2014.

3.11.1.1 Louisiana Black Bear (*Ursus americanus luteolus*) (Threatened)

The Louisiana black bear (*Ursus americanus luteolus*) is federally listed as threatened. This species typically inhabits bottomland hardwood (BLH) communities but other habitat types may be utilized. Remoteness is an important spatial feature of black bear habitat. In the Southeast, remoteness is relative to forest tract size and the presence of roads. High quality cover for bedding, denning, and escape cover is of great importance as forests become smaller, more fragmented, and as human encroachment and disturbance in bear habitat increases.

Presently there are two known breeding bear subpopulations occurring in two Louisiana river basins; the Tensas River Basin, located in northeastern Louisiana, and the Atchafalaya River Basin located in south-central Louisiana. There are reported sightings of bears outside of these areas, but it is unknown whether these bears are reproducing or are only wandering subadults and males.

The proposed project site is primarily developed with less than 5 acres of wooded habitat. The surrounding area to the north and east is primarily developed. The surrounding habitat to the west and south is heavily wooded. Potential suitable habitat is available for the Louisiana black bear on the proposed site.

3.11.1.2 West Indian Manatee (*Trichechus manatus*) (Endangered)

The West Indian manatee (*Trichechus manatus*) is federally listed as endangered and can be found in shallow coastal waters, estuaries, bays, rivers and lake. They are not able to tolerate prolonged exposure to water colder than 20 degrees Celcius. They prefer waters at least 1-2 meters in depth. Along the coast, manatees are often found in water 3-5 meters deep in areas lacking strong current. Threats include habitat loss and degradation and mortality from boat collisions, hunting, fishing, red tide poisoning, entrapment in water control structures, entanglement in fishing gear, and exposure to cold temperatures.

The proposed project site contains no water bodies and therefore no suitable habitat for the West Indian manatee. Bayou Boeuf is located 0.25 miles east of the tract but is probably too deep and cold to provide suitable habitat for this species.

3.11.1.3 Piping Plover (*Charadrius melodus*) (Threatened)

Federally listed as threatened, the piping plover (*Charadrius melodus*) winters in Louisiana, and may be present for 8 to 10 months, arriving from the breeding grounds as early as late July and remaining until late March or April. Piping plovers feed extensively on intertidal beaches, mudflats, sandflats, algal flats, and wash-over passes with no or very sparse emergent vegetation and also require unvegetated or sparsely vegetated areas for roosting. Roosting areas may have debris, detritus, or micro- topographic relief offering refuge to plovers from high winds and cold weather. In most areas, wintering piping plovers are dependant on a mosaic of sites distributed throughout the landscape, as the suitability of a particular site for foraging or roosting is dependent on local weather and tidal conditions. Typically these areas include intertidal beaches and flats (between annual low tide and annual high tide), and associated dune systems and flats

above annual high tide. Important components of intertidal flats include sand and/or mud flats with no or very sparse emergent vegetation. Adjacent unvegetated or sparsely vegetated sand, mud, or algal flats above high tide are also important, especially for roosting plovers. Major threats to this species include the loss and degradation of habitat due to development, disturbance by humans and pets, and predation.

The proposed project site is not located within designated piping plover Critical Habitat. There are also no mud flats, dunes or other potential habitat within or near the project area that could be used as foraging or loafing areas by the piping plover.

3.11.1.4 Red Knot (*Calidris canutus*) (Proposed)

The red knot (*Calidris canutus*) has been proposed for federal listing. Nesting range in North America is in northwestern and northern Alaska and Canadian arctic islands. This species migrates long distances in the winter to the coastal U.S. and South America. Primary habitat includes seacoasts on tidal flats and beaches. Primary threats include increased commercial harvest of horseshoe crabs, a reduction in horseshoe crab populations, and consequently a reduction in red knot food resources.

The proposed project site is not located on the coast and does not contain tidal flats or beaches.

3.11.1.5 Atlantic Sturgeon (*Acipenser oxyrinchus*) (Threatened)

The Atlantic sturgeon (*Acipenser oxyrinchus*) is federally listed as threatened and can primarily be found close to shore when not breeding and migrates to rivers for spawning. Spawning occurs in fresh water (sometimes tidal or brackish water) usually over a bottom of hard clay, rubble, gravel, or shell. Primary threats include overfishing which occurred primarily from the late 1800s to the early 1900s, pollution, sedimentation, and blockage of access to spawning areas by dams.

The proposed project site contains no water bodies and therefore no suitable habitat for the Atlantic sturgeon. Bayou Boeuf is located 0.25 miles east of the tract and could potentially contain suitable habitat for this species.

3.11.1.6 Pallid Sturgeon (*Scaphirhynchus albus*) (Endangered)

The pallid sturgeon is federally listed as endangered and occupies large, turbid, free-flowing riverine habitat. It occurs in strong current rivers over firm gravel or sandy substrate. The pallid sturgeon is known to occur in the Atchafalaya River in central Louisiana. The Atchafalaya River contains approximately 224 free-flowing river-kilometers. The population in this River may be a few thousand. Construction and operation of large dams and river channelization has eliminated and degraded preferred sturgeon habitat. Habitat changes have severely reduced or eliminated successful reproduction.

The proposed project site contains no water bodies and therefore no suitable habitat for the pallid sturgeon. Nearby Bayou Boeuf could potentially contain suitable habitat for this species however.

3.11.1.7 Green Sea Turtle (*Chelonia mydas*) (Threatened)

The green sea turtle (*Chelonia mydas*) is federally listed as threatened. Major threats, which vary throughout the range, include degradation of nesting habitat, including beach lighting, human predation on nesting females and turtles in foraging areas, collection of eggs for human consumption, predation on eggs, and collisions with power boats. Nesting for the sea turtle occurs on beaches, usually on islands but also on the mainland. At least in some regions, individuals generally nest at the same beach in successive nestings. Feeding occurs in shallow, low-energy waters with abundant submerged vegetation and also in convergence zones in the open ocean. Green sea turtles are occasionally observed in offshore waters of Louisiana and have been reported from inshore areas, west of the Mississippi River.

The proposed project site contains no water bodies and therefore no suitable habitat for the green sea turtle, however nearby Bayou Boeuf could potentially contain suitable habitat for this species.

3.11.1.8 Hawksbill Sea Turtle (*Eretmochelys imbricata*) (Endangered)

The hawksbill sea turtle is federally listed as endangered with the greatest threat to this species being harvest for commercial and subsistence purposes. Other threats include destruction/degradation of breeding locations by beach development and illumination and incidental take in fisheries. This species uses a wide range of tropical and subtropical habitats, including shallow coastal waters with rocky bottoms, coral reefs, beds of sea grass or algae and submerged mud flats. Hawksbill sea turtles do not nest in Louisiana, and the few sightings and captures that have been recorded from Louisiana waters have all been offshore.

The proposed project site contains no water bodies and therefore no suitable habitat for the hawksbill sea turtle, however, nearby Bayou Boeuf could potentially contain suitable habitat for this species.

3.11.1.9 Kemp's Ridley Sea Turtle (*Lepidochelys kempii*) (Endangered)

The Kemp's ridley (*Lepidochelys kempii*) is an endangered sea turtle that occurs mainly in the coastal areas of the Gulf of Mexico and northwestern Atlantic. Juveniles and sub-adults occupy shallow, coastal regions and are commonly associated with crab-laden, sandy or muddy water bottoms. Small turtles are generally found near shore from May through October. Adults may be abundant near the mouth of the Mississippi River in spring and summer. Adults and juveniles move offshore to deeper, warmer water during the winter. Between the East Gulf Coast of Texas and the Mississippi River Delta, Kemp's ridleys use near shore waters, ocean sides of jetties, small boat passageways through jetties, and dredged and nondredged channels. They have been observed within both Sabine and Calcasieu Lakes. Major threats to this species include over-exploitation on their nesting beaches, drowning in fishing nets, and pollution. Kemp's ridley sea

turtles appear to prefer habitats in the inshore areas of the Gulf of Mexico. Kemp's ridleys are characteristically found in waters of low salinity, high turbidity, high organic content, and where shrimp are abundant. Kemp's ridleys in the Gulf of Mexico tend to be concentrated around the major river mouths, such as the Rio Grande, Calcasieu, and Mississippi. Kemp's ridleys do not nest in Louisiana. Prior to the dramatic decline in their population, they were quite common in Louisiana waters.

The proposed project site contains no water bodies and therefore no suitable habitat for Kemp's ridley, however, nearby Bayou Boeuf could potentially contain suitable habitat for this species.

3.11.1.10 Leatherback Sea Turtle (Dermochelys coriacea) (Endangered)

Leather sea turtles (*Dermochelys coriacea*) are federally listed as endangered. Major threats include egg collecting and mortality associated with bycatch in fishery operations, harvest of adult females for meat and oil, nesting habitat loss, pollution, and adult ingestion of floating plastics and trash. They can be found in the open ocean often near the edge of the continental shelf. They can also be found in gulfs, bays, and estuaries. They nest on sloping sandy beaches backed up by vegetation, often near deep water and rough seas. Leatherbacks are uncommon in the inshore waters of Louisiana, but are occasionally reported from offshore waters near the mouth of the Mississippi River.

The proposed project site contains no water bodies and therefore no suitable habitat for the leatherback sea turtle, however, nearby Bayou Boeuf could potentially contain suitable habitat for this species.

3.11.1.11 Loggerhead Sea Turtle (Caretta caretta) (Threatened)

Threatened loggerhead sea turtles (*Caretta caretta*) nest within the continental U.S. from Louisiana to Virginia, with major nesting concentrations occurring on the coastal islands of North Carolina, South Carolina, and Georgia, and on the Atlantic and Gulf coasts of Florida. In Louisiana, loggerheads are known to nest on the Chandeleur Islands. Nesting and hatching dates for the loggerhead in the northern Gulf of Mexico are from May 1 through November 30. The primary threats to this species are destruction of nesting habitat and drowning in fishing nets. Loggerhead sea turtles have been known to nest on the Chandeleur Islands. They are one of the most commonly reported sea turtles in Louisiana and occasionally enter estuarine bays.

The proposed project site contains no water bodies and therefore no suitable habitat for the loggerhead sea turtle however, Bayou Boeuf could potentially contain suitable habitat for this species.

3.12 Vegetation and Wildlife

3.12.1 Vegetation

Ecoregions denote areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources. A Roman numeral hierarchical scheme has been adopted for

different levels of ecological regions. Level I is the coarsest level, dividing North America into 15 ecological regions. Level II divides the continent into 52 regions. At level III, the continental U.S. contains 104 regions whereas the conterminous U.S. has 48. Level IV ecoregions are further subdivisions of level III ecoregions. Six level III ecoregions can be found in Louisiana. The lease parcel is located in the Gulf Coast Prairies and Marshes Ecoregion. Approximately 12% of the coastal wetlands found in the U.S. are located in Louisiana. Louisiana has the largest contiguous wetland system in the lower 48 states (The Nature Conservancy 2014). Louisiana loses an average of 25-30 square miles of coastal marsh annually due to conversion to open water, agriculture and urban development.

Approximately 75% of the acreage is developed and contains, roads, houses, and businesses. Old Highway 90 runs through the northern portion of the tract. Bayou Boeuf is located ~ 0.25 miles east of the tract. A road, multiple buildings, and cleared areas are located between the Bayou and the proposed parcel. Approximately 25% of the tract is wooded with the following dominant tree species: laurel oak (*Quercus laurifolia*), willow oak (*Q. phellos*), northern oak (*Q. rubra*), sweetbay (*Magnolia virginiana*), mockernut hickory (*Carya tomentosa*), and water oak (*Q. nigra*).

3.12.2 Wildlife

Wildlife diversity and abundance is likely limited due to amount of development on the acreage and high amount of human activity. In general, the species that inhabited the southeast Louisiana area prior to European settlement are still present in nondeveloped areas today. Notable exceptions include the bison, elk, red wolf, and ivory-billed woodpecker. Some species, such as the house sparrow, European starling, and nutria have been introduced, while others such as the coyote and armadillo have expanded their ranges and are now common inhabitants (USDA 1999). Most species may occur commonly in one particular habitat but are also likely to frequent adjacent habitats.

Wildlife population levels have changed tremendously over time. For example, many current game species have increased through careful management and habitat manipulation. Deer and turkey populations, formerly low due to unregulated hunting, have increased through reintroduction, management, and increased protection. Other species, like the Red-cockaded woodpecker, northern bobwhite quail, and Bachman's sparrow have declined due to past timber harvest methods and the infrequency of large-scale wildfires.

Hunting is a popular pastime in Louisiana and game species populations are high enough to support this activity. Major game on non-developed areas of northwest Louisiana includes white-tailed deer, wild turkey, fox, gray squirrel, bobwhite quail, woodcock, waterfowl, and the morning dove.

3.13 Migratory Bird Species of Concern

EO 13188, 66 Fed. Reg. 3853, (January 17, 2001) identifies the responsibility of federal agencies to protect migratory birds and their habitats, and directs executive departments and agencies to undertake actions that will further implement the Migratory Bird Treaty Act (MBTA). Under the

MBTA, incidental, unintentional, and accidental take, killing, or possession of a migratory bird or its parts, nests, eggs or products, manufactured or not, without a permit is unlawful. EO 13186 includes a directive for federal agencies to develop a Memorandum of Understanding (MOU) with the FWS to promote the conservation of migratory bird populations, including their habitats, when their actions have, or are likely to have, a measureable negative effect on migratory bird populations.

For the purpose of this analysis, the term “migratory birds” applies generally to native bird species protected by the MBTA. This includes native passerines (flycatchers and songbirds) as well as birds of prey, migratory waterbirds (waterfowl, wading birds, and shorebirds), and other species such as doves, hummingbirds, swifts, and woodpeckers. The term “migratory” is a misnomer and should be interpreted broadly to include native species that remain in the same area throughout the year as well as species that exhibit patterns of latitudinal or elevational migration to avoid winter conditions of cold or shortage of food. For most migrant and native resident species, nesting habitat is of special importance because it is critical for supporting reproduction in terms of both nesting sites and food. Also, because birds are generally territorial during the nesting season, their ability to access and utilize sufficient food is limited by the quality of the territory occupied. During non-breeding seasons, birds are generally non-territorial and able to feed across a larger area and wider range of habitats.

Among the wide variety of species protected by the MBTA, special concern is usually given to the following groups:

- Species that migrate across long distances, particularly Neotropical migrant passerines that winter in tropical or Southern Hemisphere temperate zones
- Birds of prey, which require large areas of suitable habitat for finding sufficient prey
- Species that have narrow habitat tolerances and hence are vulnerable to extirpation from an area as a result of a relatively minor habitat loss
- Species that nest colonially and hence are vulnerable to extirpation from an area as a result of minor habitat loss

Because of the many species that fall within one or more of these groups, BLM focuses on species identified by FWS as Birds of Conservation Concern (BCC) (USDI 2002). Table 4 lists the BCC found in the Southeastern Coastal Plain Bird Conservation Region, where the lease parcel is located.

Table 4. List of BCC found in the Southeastern Coastal Plain Bird Conservation Region.

Common Name	Scientific Name
Kentucky Warbler	<i>Oporonis formosus</i>
American Bittern (nb)	<i>Botaurus lentiginosus</i>
American Kestrel (<i>paulus</i> ssp.)	<i>Falco sparverius paulus</i>
American Oystercatcher	<i>Haematopus palliatus palliatus</i>

Audubon's Shearwater (nb)	<i>Puffinus nativitatis</i>
Bachman's Sparrow	<i>Aimophila aesivalis</i>
Bald Eagle (b)	<i>Haliaeetus leucocephalus</i>
Bewick's Wren (<i>bewickii</i> ssp.)	<i>Thryomanes bewickii bewickii</i>
Black Rail	<i>Laterallus jamaicensis</i>
Black Skimmer	<i>Rynchops miger</i>
Black-capped Petrel (nb)	<i>Pterodroma hasitata</i>
Black-throated Green Warbler	<i>Dendroica virens</i>
Blue-winged Warbler	<i>Vermivora pinus</i>
Brown-headed Nuthatch	<i>Sitta pusilla</i>
Buff-breasted Sandpiper (nb)	<i>Tryngites subruficollis</i>
Cerulean Warbler	<i>Dendroica cerulea</i>
Chuck-will's-widow	<i>Caprimulgus carolinensis</i>
Common Ground-Dove	<i>Colombina passerina</i>
Gull-billed Tern	<i>Gelochelidon nilotica</i>
Henslow's Sparrow	<i>Ammodramus henslowii</i>
Least Bittern	<i>Ixobrychus exilis</i>
Least Tern (c)	<i>Sternula antillarum</i>
LeConte's Sparrow (nb)	<i>Ammodramus leconteii</i>
Limpkin	<i>Aramus guarana</i>
Loggerhead Shrike	<i>Lanius ludovicianus</i>
Long-billed Curlew (nb)	<i>Numenius americanus</i>
Marbled Godwit (nb)	<i>Limosa fedoa</i>
Nelson's Sharp-tailed Sparrow (nb)	<i>Ammodramus nelsoni</i>
Painted Bunting	<i>Passerina ciris</i>
Peregrine Falcon (b)	<i>Falco peregrinus</i>
Prairie Warbler	<i>Dendroica discolor</i>
Prothonotary Warbler	<i>Protonotaria citrea</i>
Red Knot (<i>rufa</i> ssp.) (a) (nb)	<i>Caladris canutus rufa</i>
red-headed Woodpecker	<i>Melanerpes erythrocephalus</i>
Red-throated Loon	<i>Gavia stellata</i>
Roseate Spoonbill (nb)	<i>Platalea ajaja</i>
Rusty Blackbird (nb)	<i>Euphagus carolinus</i>
Saltmarsh Sharp-tailed Sparrow (nb)	<i>Ammodramus caudacutus</i>
Sandwich Tern	<i>Thalasseus sandvicensis</i>
Seaside Sparrow (c)	<i>Ammodramus maritimus</i>
Sedge Wren (nb)	<i>Cistothorus platensis</i>
Semipalmated Sandpiper (Eastern) (nb)	<i>Calidris pusilla</i>
Short-billed Dowitcher (nb)	<i>Limnodromus griseus</i>
Snowy Plover (c)	<i>Charadrius alexandrinus nivosus/tenuirostis</i>
Solitary Sandpiper (nb)	<i>Tringa solitaria</i>

Swainson's Warbler	<i>Limnothlypis swainsonii</i>
Swallow-tailed Kite	<i>Elanoides forficatus</i>
Upland Sandpiper (nb)	<i>Bartramia longicauda</i>
Whimbrel (nb)	<i>Numenius phaeopus</i>
Whip-poor-will	<i>Caprimulgus vociferus</i>
Wilson's Plover	<i>Charadrius wilsonia wilsonia</i>
Wood Thrush	<i>Hylocichla mustelina</i>
Yellow Rail (nb)	<i>Coturnicops noveboracensis</i>

Note: (a) - ESA candidate, (b) - ESA delisted, (c) - non-listed subspecies or population of threatened or endangered species, (nb) - non-breeding in this Bird Conservation Region

There is suitable habitat on the proposed lease parcel for several BCC on this list.

Ch. 4 - ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

4.0 Introduction

This chapter assesses potential environmental consequences associated with direct, indirect, and cumulative effects of the Proposed Action. The act of leasing the parcel would, by itself, have no impact on any resources in the lease area. All impacts would be linked to as yet undetermined future levels of lease development. If this parcel was developed, short-term impacts are considered those that would be stabilized or mitigated within five years and long-term impacts are those that would substantially remain for more than five years. Cumulative impacts include the combined effect of past projects, specific planned projects and other reasonably foreseeable future actions such as other infield wells being located within these leases. The cumulative impacts fluctuate with the gradual reclamation of well abandonments and the creation of new additional surface disturbances from the construction of new access roads and well pads. The on-going process of restoration of abandonments and creating new disturbances for drilling new wells gradually accumulates as the minerals are extracted from the land. Preserving as much land as possible and applying appropriate mitigation measures will alleviate the cumulative impacts. Cumulative impacts are addressed for each resource within each resource section.

Based on review of elements of the environment and consideration of the Purpose and Need statement prepared for this EA, the following elements will be addressed: Environmental Justice, Cultural Resources and Native American Concerns, Visual/Noise Resources, Minerals and Mineral Development, Wastes, Soils, Air Resources, Water Resources - Surface/Ground, Floodplains/Riparian Areas/Wetlands Invasive/Exotic Species, Special Status Species, Wildlife and Vegetation and Migratory Birds of Concern.

4.1 Environmental Justice

No minority or low income populations would be directly or disproportionately affected in the vicinity of the lease parcel from the proposed lease or possible subsequent development. The proposed lease would not create an unsafe or unhealthy environment for any population, including minority and low-income populations and therefore will not be out of conformance with EO 12898. Indirect impacts from possible future development could include an increase in overall employment opportunities related to the oil and gas and service support industry in the region, as well as the economic benefits to state and parish governments related to royalty payments and severance taxes. Other potential impacts include a short-term increase in traffic volume and dust and noise which could negatively impact nearby residents or businesses. These nuisance impacts are usually limited to the construction, drilling, and/or completion phases and would be significantly reduced during production, when the site would be visited periodically for inspection and/or to haul produced fluids. These impacts would apply to all land users in the area. There are no cumulative impacts anticipated for environmental justice from issuing the lease.

4.2 Cultural Resources and Native American Concerns

If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. Cultural resource surveys have not been conducted, therefore direct and indirect impacts may occur to cultural resources or to a potentially sacred Native American religious site if there is ground disturbance. Direct impacts are those such as completely destroying a site by bulldozing the area and workers picking up artifacts. Indirect impacts are those such as erosion or compaction of the soil on the site. However, if sites are located and recorded before ground disturbance begins, these impacts can be avoided or mitigated.

Cumulative effects from repetitious illegal activity, primarily archeological vandalism, may occur on certain sites or site types unless perpetrators are apprehended and prosecuted. The degree of cumulative effects to known properties from BLM activities should be slight as inventory, assessment, protection, and mitigation measures would be implemented at the APD stage.

A stipulation regarding cultural resources and Native American religious concerns applies to this lease (Appendix B) and is applicable for the proposed parcel. The stipulation states that the BLM will not approve any ground disturbing activities that may affect historic properties and/or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. If currently unknown burial sites are discovered during development activities associated with this lease, these activities must cease immediately, applicable law on unknown burials will be followed and, if necessary, consultation with the appropriate tribe/group of federally recognized Native Americans will take place.

Consultation with the SHPO occurred on November 17, 2014. A concurrence letter was received on December 20, 2014 and can be found in Appendix C. SHPO concurred with BLM's determination that a cultural survey take place prior to any ground disturbing activities. Letters were sent to various Native American Tribes on November 17, 2014 notifying them of the proposed action and requesting comments or concerns. A response was not received.

4.2.1 Mitigation

A BLM stipulation regarding cultural resources and Native American religious concerns applies to this lease parcel (Appendix B). The stipulation states that the BLM would not approve any ground disturbing activities that may affect historic properties and/or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. If currently unknown burials are discovered during development activities associated with this lease, these activities must cease immediately, applicable law on unknown burials will be followed and, if necessary, consultation with the appropriate Tribe/group of federally recognized Native Americans will take place.

4.3 Visual/Noise Resources

4.3.1 Visual

While the act of leasing federal minerals would produce no impacts to visual resources, subsequent exploration/development of the proposed lease could impact visual quality through: increased visibility of constructed features such as roads, well pads, pipelines, and tank batteries; road degeneration from heavy trucks and vehicles following rain; dust and exhaust from construction, drilling, and production vehicles and equipment; vegetation removal and construction of steep slopes; unreclaimed sites; and discarded equipment. If development of the federal minerals were to occur from the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. Well pads, power lines, access roads, and associated production facilities and storage tanks have the greatest potential to alter visual conditions for the life of the well. Vegetation removal would present an obvious contrast in color with the surrounding vegetation and affect foreground and middleground distance zones for more than a decade. These impacts would be most obvious immediately after construction. Impacts would decrease as the disturbed surface began to blend in color, form, and texture, when interim or final reclamation occurs. Long-term visual impacts could persist as long as the well is producing, which could be a couple of years to more than 50 years. Long-term impacts may include vegetation removal, alteration of the landscape, and installation of equipment and facilities. The extent of cumulative effects on visual resources will depend on the future amount of oil and gas development in northwest Louisiana. Oil and gas productivity has been high in this area and it is likely that continued development will also be high. Additional roads, wells pads and other constructed features due to oil and gas development will have a negative cumulative effect on visual resources. As well pads get reclaimed however, this impact should diminish.

4.3.2 Noise

Noise generation from well operations would be associated with vehicle movements and the operation of production equipment. Increased traffic to well sites will have a short-term impact on noise levels. After drilling operations are completed, minimal traffic for maintenance will be associated with the proposed wells. Impacts from noise on people and wildlife species inhabiting the areas are expected to be minimal and of occasional and short duration for the proposed parcels. The extent of cumulative impacts to noise in the area surrounding the proposed parcels will depend on the future amount of oil and gas development in the area. Development could increase noise levels. An increase in noise levels should be periodic and only occur during drilling operations.

4.4 Minerals and Mineral Development

While the act of leasing federal minerals would produce no impacts to mineral resources, subsequent exploration/development of the proposed lease could impact the production horizons and reservoir pressures. If production wells are established, the resources allotted to the wells would eventually be depleted. The amount and location of direct and indirect effects cannot be

predicted until site-specific development information is available, typically during the APD stage.

Other mineral resources could be impacted as a result of exploration/development through the loss of available surface or subsurface area needed to develop or access the other mineral resource overlapping the subject lease parcels. The extent of the impacts (direct, indirect, or cumulative), if any, cannot be predicted until site-specific development information is available at the APD stage.

4.5 Wastes

While the act of leasing federal minerals would produce no wastes, subsequent exploration/development of the proposed lease could result in the introduction of hazardous and non-hazardous substances to the site. Hazardous substances may be produced, used, stored, transported or disposed of as a result of development on the proposed lease. Projects would typically generate the following wastes: (1) discharge of drilling fluids and cuttings into the reserve pits, (2) wastes generated from used lubrication oils, hydraulic fluids, and other fluids used during production of oil and gas, some of which may be characteristic or listed hazardous waste, and (3) service company wastes from exploration and production activities as well as containment of some general trash. Certain wastes unique to the exploration, development, and production of crude oil and natural gas have been exempted from Federal Regulations as hazardous waste under Subtitle C of the RCRA of 1976. The exempt waste must be intrinsic to exploration, development or production activities and cannot be generated as part of a transportation or manufacturing operation. The drilling fluids, drill cuttings, and produced waters are classified as a RCRA exempt waste, and potential drilling that could occur would not introduce hazardous substances into the environment if they are managed and disposed of properly under federal, state, and local waste management regulations and guidelines. Properly used, stored, and disposed of hazardous and non-hazardous substances greatly decreases the potential for any impact on any environmental resources. One way operators and the BLM ensure hazardous and non-hazardous substances are properly managed is through the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) plan. Hydraulic fracturing would not occur for any wells associated with this lease.

Surface spills of drilling mud and additives, flowback water, and other formation fluids can happen at a variety of points in the development and production phases. Spills that occur can span a range of different spill sizes and causes of failure at any point in the process. For example, small spills often happen as the result of poor pipe connections or leaks; large spills sometimes occur as the result of a major well blowout, but such blowouts rarely occur. Additionally, spills from some parts of the phases may be the result of human error (i.e. vehicle collisions, improper handling, improper equipment operation or installation, etc.), while others stem from equipment failure (i.e. broken pipes, torn pit liners, leading tanks, etc.) or acts of nature (Fletcher 2012). The most common cause of spills comes from equipment failure and corrosion (Wenzel 2012).

The cause of the spill, the spill size, the hazard rating of the spilled material, response time to clean up the spill and the effectiveness of the cleanup, all play a critical role in determining the overall impact on the environment. The volume of a spill can significantly vary with spill types.

Pipe spills are not expected to release more than 1,000 gallons into the environment, retaining pit spills and truck spills are not expected to release more than 10,000 gallons of fluid, and blowouts are expected to cause the largest spills, with the potential to release tens of thousands of gallons into the environment. Small spills occur with greater frequency than large spills. Secondary containment or recovery for small spills would likely minimize, if not eliminate, any potential release into the environment. However, for spills on the order of several thousands of gallons of fluid, it is expected that less than half the fluid may be captured by secondary containment or recovery. The vast majority of operations do not incur reportable spills (5 gallons or more), indicating that the fluid management process can be, and usually is, managed safely and effectively (Fletcher 2012). Cumulative effects from wastes are not anticipated. There are several BLM standard COAs that will apply at the APD stage which would reduce waste hazards.

4.5.1 Mitigation

Specific mitigation is deferred to the APD process. However, the following measures are common to most projects: all trash would be placed in a portable trash cage and hauled to an approved landfill, with no burial or burning of trash permitted, chemical toilets would be provided for human waste, fresh water zones encountered during drilling operations would be isolated by using casing and cementing procedures, a berm or dike would enclose all production facilities if a well is productive, and all waste from all waste streams on site would be removed to an approved disposal site. Future development activities on these lease parcels would be regulated under the RCRA, Subtitle C regulations. Additionally, waste management requirements are included in the 12 point surface use plan and the 9 point drilling plan required for all APDs. Leaseholders proposing development would be required to have approved SPCCPs, if the applicable requirements of 40 CFR 112 are met, and comply with all requirements for reporting of undesirable events. Lease bonds would not be released until all facilities have been removed, wells are plugged, and satisfactory reclamation has occurred.

There are 5 standard BLM COAs that would apply at the APD stage regarding handling and disposing of wastes. These COAs include: storing wastes properly to minimize the potential for spills, providing secondary containment for all stored containers, draining the reserve pit before closure and trucked to a disposal site, use of preventative measures to avoid drainage of fluids, sediments, and other contaminants from the pad into water bodies, and keeping the project area clear of trash (Appendix B).

Further, if shallow groundwater is expected or encountered at the project specific site, open reserve pits would not be authorized and all waste products would be hauled from the site to state-approved disposal facilities.

4.6 Soils

While the act of leasing federal minerals would produce no impacts to soils, subsequent exploration/development of the subject lease could produce impacts by physically disturbing the topsoil and exposing the substratum soil on subsequent project areas. If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could

occur on the lease site. Direct impacts resulting from oil and gas construction of well pads, access roads, and reserve pits include: removal of vegetation, exposure of the soil, mixing of horizons, compaction, loss of topsoil productivity and susceptibility to wind and water erosion. Wind erosion would be expected to be a minor contributor to soil erosion with the possible exception of dust from vehicle traffic during all phases of development. Vehicle traffic related wind erosion would be limited to approved travel routes in which the surface has not been paved or dressed in a material to prevent soil movement. The extent of wind erosion related to vehicle traffic will be dependent on a number of factors including: length of well bore, whether hydraulic fracturing is used during completion, whether telemetry is used during production, and whether the well is gas, oil, condensate, or a combination thereof. These impacts could result in increased indirect impacts such as runoff, erosion and off-site sedimentation. Activities that could cause these types of indirect impacts include construction and operation on well sites, access roads, gas pipelines and facilities.

Additional soil impacts associated with lease development would occur when heavy precipitation causes water erosion damage. When water saturated segment(s) on the access road become impassable, vehicles may still be driven over the road. Consequently, deep tire ruts would develop. Where impassable segments are created from deep rutting, unauthorized driving may occur outside the designated route of access roads.

Contamination of soil from drilling and production wastes mixed into soil or spilled on the soil surface could cause a long-term reduction in site productivity. Contaminants spilled on soil would have the potential to pollute and/or change the soil chemistry. See the Waste Section (4.4) for a more in-depth analysis of spill contamination. Cumulative impacts could include loss of soil productivity, erosion and sedimentation issues, and road damage due to the direct and indirect impacts discussed above. These direct, indirect, and cumulative impacts can be reduced or avoided through proper design, construction, maintenance and implementation of Best Management Practices (BMPs) and COAs.

4.6.1 Mitigation

If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. If surface disturbance were to occur, the operator would stockpile the topsoil from the surface of well pads which would be used for surface reclamation of the well pads. During the life of the development, all disturbed areas not needed for active support of production operations should undergo “interim” reclamation in order to minimize the environmental impacts of development on other resources and used. Upon abandonment of wells and/or when access roads are no longer in service, final reclamation would be implemented.

The impact to the soil would be remedied upon reclamation of well pads when the stockpiled soil that was specifically conserved to establish a seed bed is spread over well pads and vegetation re-establishes. A permanent vegetation cover would be established on all disturbed areas. Road construction requirements and regular maintenance would alleviate potential impacts to access roads from water erosion damage.

Fluid impermeable containment systems (i.e. liners, dikes, berms) would be placed in, under and/or around any tank, pit, drilling cellar, ditches associated with the drilling process, or other equipment that use or has the potential to leak/spill hazardous and non-hazardous fluids, to completely prevent solid contamination (e.g. liners) at the site or prevent the spill from going beyond the immediate site (e.g. dikes, berms).

A standard BLM COA would apply at the APD stage which would require the operator to take necessary measures to ensure that the final graded slopes are stabilized to prevent the movement of soil from the pad area for the life of the project. Stabilization techniques could include: natural, organic matting, silt fences, and or additional mulching.

4.7 Air Resources

4.7.1 Air Quality

The administrative act of offering any of these parcels and the subsequent issuing of leases would have no direct impacts to air quality. Any potential effects to air quality would occur if and when the lease was developed. Any proposed development project would be subject to additional analysis of possible air effects before approval. The analysis may include air quality modeling for the activity.

An MOU between the Departments of the Interior and Agriculture and EPA directs that air quality modeling be conducted for actions that meet certain emissions or geographic criteria:

- Creation of a substantial increase in emissions
- Material contribution to potential adverse cumulative air quality impacts
- Class I or sensitive Class II Areas
- Non-attainment or maintenance area
- Area expected to exceed NAAQS or PSD increment

The project area includes no Class I, sensitive Class II, or non-attainment areas. Due to the small number of wells projected to follow a lease on the lease tracts in relation to the current volume of hydrocarbon, development of the lease is not likely to exceed the emissions criteria, NAAQS or PSD increment.

The following source of emissions are anticipated during any oil and gas exploration or development: combustion engines (i.e. fossil fuel fired internal combustion engines used to supply electrical or hydraulic power for hydraulic fracturing to drive the pumps and rigs used to drill the well, drill out the hydraulic stage plugs and run the production tubing in the well; generators to power drill rigs, pumps, and other equipment; compressors used to increase the pressure of the oil or gas for transport and use; and tailpipe emissions from vehicles transporting

equipment to the site), venting (i.e. fuel storage tanks vents and pressure control equipment), mobile emissions (i.e. vehicles bringing equipment, personnel, or supplies to the location) and fugitive sources (i.e. pneumatic valves, tank leaks, and dust). A number of pollutants associated with combustion of fossil fuels are anticipated to be released during drilling including: CO, NO_x, SO₂, Pb, PM, CO₂, CH₄, and N₂O. Venting may release VOC/HAP, H₂S, and CH₄. Mobile source emissions are likely to include fugitive particulate matter from dust or inordinate idling.

The actual emissions of each pollutant will be entirely dependent on the factors described in the previous paragraph. During the completion phase, the most significant emissions of criteria pollutants emitted by oil and gas operations in general are VOCs, particulate matter and NO₂. VOCs and NO_x contribute to the formation of O₃. The EPA's Natural Gas STAR Program is a voluntary program that identifies sources of fugitive CH₄ and seeks to minimize fugitive CH₄ through careful tuning of existing equipment and technology upgrades. Data provided by STAR show that some of the largest air emissions in the natural gas industry occur as natural gas wells that have been fractured and are being prepared for production. During well completion, flowback, water, and reservoir gas come to the surface at high velocity and volume. This mixture includes a high volume of VOCs and CH₄, along with air toxins such as benzene, ethylbenzene, and n-hexane. The typical flowback process lasts from 3 to 10 days. Pollution also is emitted from other processes and equipment during production and transportation of the oil and gas from the well to a processing facility.

To reasonably quantify emissions associated with well exploration and production activities, certain types of information are needed. Such information includes a combination of activity data such as:

- The number, type, and duration of equipment needed to construct/reclaim, drill and complete (e.g. belly scrapers, rig, completions, supply trucks, compressor, and production facilities)
- The technologies which may be employed by a given company for drilling any new wells to reduce emissions (e.g. urea towers on diesel powered drill rigs, green completions, and multi-stage flares)
- Area of disturbance for each type of activity (e.g. roads, pads, pipelines, electrical lines, and compressor station)
- Compression per well (sales and field booster), or average horsepower for each type of compressor
- The number and type of facilities utilized for production

The degree of impact will also vary according to the characteristics of the geological formations from which production occurs. Currently, it is not feasible to directly quantify emissions. What can be said is that emissions associated with oil and gas exploration and production would incrementally contribute to increases in air quality emissions into the atmosphere.

Air pollution can affect public health in many ways. Numerous scientific studies have linked air pollution to a variety of health problems including: (1) aggravation of respiratory and cardiovascular disease, (2) decreased lung function, (3) increased frequency and severity of respiratory symptoms such as difficulty breathing and coughing, (4) increased susceptibility to respiratory infections, (5) effects on the nervous system, including the brain, such as IQ loss and impacts on learning, memory, and behavior, (6) cancer, and (7) premature death. Some sensitive individuals appear to be at greater risk for air pollution-related health effects, for example, those with pre-existing heart and lung diseases (e.g., heart failure/ischemic heart disease, asthma, emphysema, and chronic bronchitis), diabetics, older adults, and children.

Significant degradation of air quality may also damage ecosystem resources. For example, ozone can damage vegetation, adversely impacting the growth of plants and trees. These impacts can reduce the ability of plants to uptake CO₂ from the atmosphere and can then indirectly affect the larger ecosystems.

Cumulative effects from potential oil and gas development from the proposed lease and possible future development could be an overall increase in CO, NO_x, SO₂, Pb, PM, CO₂, CH₄, and N₂O. However, according to EPA's Air Trends report for 2011 (EPA 2011), since 1990, nationwide air quality has improved significantly for the six common air pollutants (Figure 2). These six pollutants are ground-level O₃, PM_{2.5}, PM₁₀, Pb, NO₂, CO, and SO₂. Nationally, air pollution was lower in 2010 than in 1990 for:

- 8-hour O₃, by 17%
- 24-hour PM₁₀, by 38%
- 3-month average Pb, by 83%
- annual NO₂, by 45%
- 8-hour CO, by 73%
- annual SO₂, by 75%

Nationally, annual PM_{2.5} concentrations were 24% lower in 2010 compared to 2001 and 24-hour PM_{2.5} concentrations were 28% lower in 2010 compared to 2001. O₃ levels did not improve in much of the East until 2002, after which there was a significant decline. Eight-hour O₃ concentrations were 13% lower in 2010 than in 2001. This decline is largely due to reductions in NO_x required by EPA rules including the NO_x State Implementation Plan (SIP) Call, preliminary implementation of the Clean Air Interstate Rule (CAIR), and Tier 2 Light Duty Vehicle Emissions Standards.

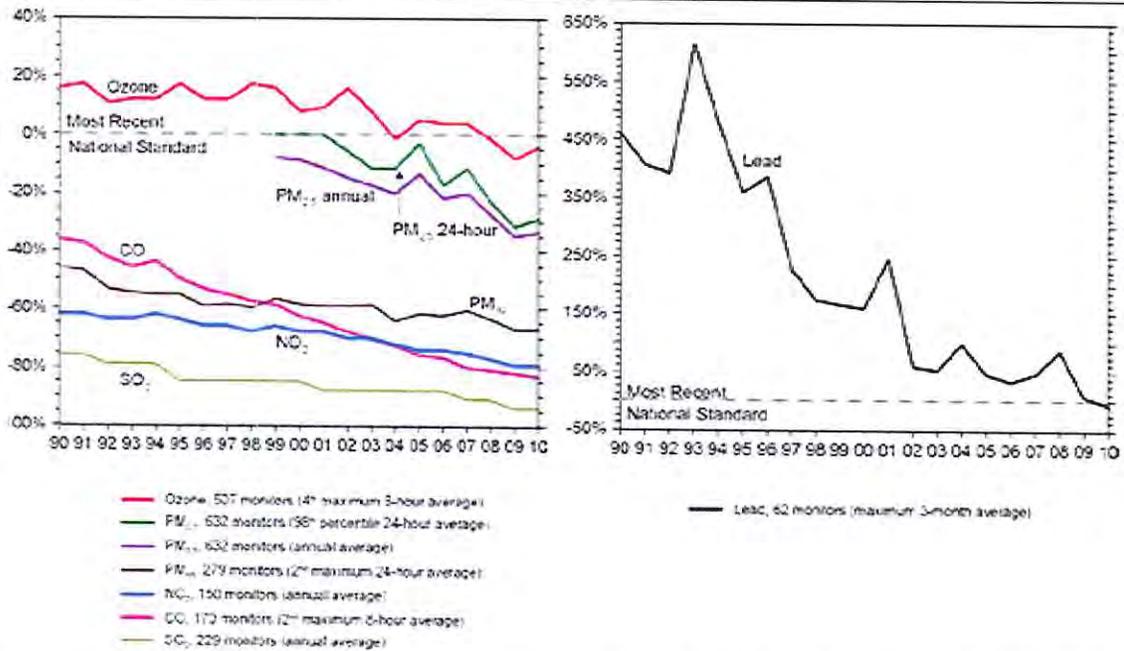


Figure 2. Comparison of national levels of the six common pollutants to the most recent NAAQS, 1990-2010. National levels are averages across all monitor stations with complete data for the time period. Note: Air quality data for PM_{2.5} starts in 1999 (EPA, 2011).

EPA concludes that total emissions of toxic air pollutants have decreased by approximately 42% between 1990 and 2005. Control programs for mobile sources and facilities such as chemical plants, dry cleaners, coke ovens, and incinerators are primarily responsible for these reductions. They also found that monitored concentrations of toxic pollutants such as benzene, 1,3-butadiene, ethylbenzene, and toluene decreased by 5% or more per year between 2003 and 2010 at more than half of ambient monitoring sites. Other toxic air pollutants of concern to public health such as carbon tetrachloride, formaldehyde, and several metals, declined at most sites.

4.7.1.1 Mitigation

The BLM encourages industry to incorporate and implement BMPs, which are designed to reduce impacts to air quality by reducing emissions, surface disturbances, and dust from field production and operations. Typical measures include:

- Flared hydrocarbon gases at high temperatures in order to reduce emissions of incomplete combustion
- Watering dirt roads during periods of high use to reduce fugitive dust emissions
- Co-location wells and production facilities to reduce new surface disturbance

- Implementation of directional drilling and horizontal completion technologies whereby one well provides access to petroleum resources that would normally require the drilling of several vertical wellbores
- Requiring that vapor recovery systems be maintained and functional in areas where petroleum liquids are stored
- Performing interim reclamation to reclaim areas of the pad not required for production facilities and to reduce the amount of dust from the pads

Additionally, the BLM encourages oil and natural gas companies to adopt proven, cost-effective technologies and practices that improve operational efficiency and reduce natural gas emissions.

In October 2012, EPA promulgated air quality regulations for completion of hydraulically fractured gas wells. These rules require air pollution mitigation measures that reduce the emissions of VOCs during gas well completions. Mitigation includes a process known as “Green Completion” in which natural gas brought up during flowback must be recaptured and rerouted into the gathering line. In addition, at the APD stage, the BLM would encourage operators to participate in the voluntary STAR program.

4.7.2 Climate and Climate Change

The administrative act of leasing the proposed federal minerals would not result in any direct GHG emissions. However, in regard to future development, the assessment of GHG emissions and climate change is in its formative phase. While it is not possible to accurately quantify potential GHG emissions in the affected area as of the proposed lease, some general assumptions can be made: the proposed lease may contribute to the installation and production of new wells, which may consequently lead to an increase in GHG emissions.

Emissions from fossil fuel production grew 101% from 1990 to 2005 and are projected to increase by a further 10% between 2005 and 2020. The natural gas industry is the major contributor to both GHG emissions and emissions growth, with CH₄ emissions from coal mining second. That said, it is worth noting that a significant portion of the emissions attributed to the natural gas industry are due to vented gas from processing plants, many of which are used for injection in enhanced oil recovery operations. Additionally, many technological advances in emission control technology have been implemented by the oil and gas industry to reduce emission levels.

Many aspects of oil and gas production emit GHGs. The primary aspects include the following:

- Fossil fuel combustion for construction and operation of oil and gas facilities which include vehicles driving to and from production sites, engines that drive drill rigs, etc. These produce CO₂ in quantities that vary depending on the age, types, and conditions of the equipment as well as the targeted formation, locations of wells with respect to processing facilities and pipelines, and other site-specific factors.

- Fugitive CH₄ is CH₄ that escapes from wells (both gas and oil), oil storage, and various types of processing equipment. This is a major source of global CH₄ emissions. These emissions have been estimated for various aspects of the energy sector, and starting in 2011, producers are required under 40 CFR 98, to estimate and report their CH₄ emissions to the EPA.
- It is expected that drilling will produce marketable quantities of oil and/or gas. Most of these products will be used for energy, and the combustion of the oil and/or gas would release CO₂ into the atmosphere. Fossil fuel combustion is the largest source of global CO₂.

The assessment of GHG emissions, their relationship to global climatic patterns, and the resulting impacts is an ongoing scientific process. It is currently not feasible to know with certainty the net impacts from the proposed action on climate – that is, while BLM actions may contribute to the climate change phenomenon, the specific effects of those actions on global climate are speculative given the current state of the science. The BLM does not have the ability to associate a BLM action’s contribution to climate change with impacts in any particular area. The science to be able to do so is not yet available. The inconsistency in results of scientific models designed to predict climate change on regional or local scales, limits the ability to quantify potential future impacts of decisions made at this level and determining the significance of any discrete amount of GHG emissions is beyond the limits of existing science. When further information on the impact to climate change is known, such information would be incorporated in the BLM’s planning and NEPA documents as appropriate.

In recent years, many states and other organizations have initiated GHG inventories, tallying GHG emissions by economic sector. The EPA provides links to statewide GHG emissions inventories (EPA 2014), however this inventory information is not available for Louisiana. Guidelines for estimating project-specific GHG emissions are available (URS Corporation 2010), but some necessary data, including the volume of oil produced and the number of wells, are not available for the proposed action. The uncertainties regarding numbers of wells and other factors make it very impractical to attempt to project amounts of GHG that the proposed action would emit. At the APD stage, more site-specific information on GHG impacts and mitigation measures would be described in detail.

Recent IPCC publications (2013) indicate that due to increasing temperatures, faster evaporation rates, and more sustained droughts brought on by climate change, increasing levels of GHGs contributing to climate change may bring about the following impacts in the southeastern U.S., including LA:

- A shift towards a warmer climate with an increase in extreme high temperatures and a reduction in extreme low temperatures. These changes have been especially apparent in the western half of North America
- Abnormally hot days and nights and heat waves are very likely to become more frequent. Cold days and cold nights are very likely to become much less frequent

- Increasing stress due to heat waves. This may lead to more illness and death, particularly among the young, elderly and frail
- Respiratory disorder may be exacerbated by warming-induced deterioration in air quality
- The growing season length is expected to increase. However, as temperature rises, crops grown in the southwestern U.S. will increasingly experience temperatures above their optimum, and animal production of meat or dairy products will be impacted by temperature extremes
- Weeds and other invasive plants will continue to migrate northward
- Arid areas are very likely to experience increases in erosion and fire risk
- An increase in the length of the forest fire season and the area subject to forest fires
- Additional stress to ground water and surface water sources that are already overtaxed in many areas
- Changes in the abundance and spatial distribution of species and expanded ranges of tree killing insects, vector-borne and tick-borne diseases
- Precipitation is likely to be less frequent but more intense and precipitation extremes are very likely to increase
- Increased weather related losses of property
- Rising sea level in and around the Gulf Coast area
- It is likely that hurricane intensity will increase in response to human-caused warming, but this requires further study

4.7.3 Cumulative Impacts on Air Quality and Climate Change

In February 2014, the BLM completed a document titled, “The Air Resources Technical Report.” The purpose of the document is to summarize the technical information on air quality and climate change relative to all EAs for APDs and lease sales. It includes a description of the varied sources of national and regional emissions that are incorporated here to represent the past, present, and reasonably foreseeable impacts to air resources (USDI 2014). It includes a summary of emissions on the national and regional scale by an industry source. Sources that are considered to have notable contributions to air quality impacts and GHG emissions include electrical generating units, fossil fuel production (nationally and regionally) and transportation.

The very small increase in emissions that could result from approval of the proposed action would not result in the area violating the NAAQS for any criteria pollutant. In October 2012,

EPA regulations that require control of VOC emissions from oil and gas development became effective. These regulations will reduce VOC emissions from oil and gas exploration and production emissions that contribute to the formation of O₃. Emissions from any lease development are not expected to impact the 8-hour average O₃ concentrations, or any other criteria pollutants in the area of the proposed lease.

Visitors to national parks and wilderness areas list the ability to view unobscured scenic vistas as a significant part of a satisfying experience. Unfortunately, visibility impairment has been documented in all Class I areas with visibility monitoring. Most visibility impairment is in the form of regional haze. The greatest visibility impairment due to regional haze occurs in the eastern U.S. and in southern California, while the least impairment occurs in the Colorado Plateau, Nevada Great Basin areas, and in Alaska. Ammonium sulfate contributes at least 50% to visibility impairment at most Class I areas in the eastern U.S. The contribution to visibility impairment from ammonium nitrate is highest in central and southern California and in the Midwest. The largest region of high rural organic carbon visibility impairment is in the southeastern U.S. Impairment in this range is also present in the Sierra Nevada region of California and in the northern Rockies of Montana. The highest contribution to visibility impairment from fine soil is found in the arid Southwest. The highest coarse particle contribution to impairment is also in the arid Southwest and southern California (IPCC 2013). Visibility impairment on federal lands can also result from plume intrusion and has been documented in Mount Zirkel Wilderness, Moosehorn National Wildlife Refuge, and Grand Canyon National Park.

The EPA develops an annual report called the Inventory of U.S. Greenhouse Gas Emissions and Sink (Inventory). According to the Inventory report, in 2012, total GHG emissions in the U.S. were 6,525.6 million metric tons (Tg) CO_{2e}. Total U.S. emissions have increased by 4.7% from 1990 to 2012, and emissions decreased from 2011 to 2012 by 3.4% (227.4 Tg CO_{2e}). The decrease from 2011 to 2012 was due to a decrease in the carbon intensity of fuels consumed by power producers to generate electricity due to a decrease in the price of natural gas, a decrease in transportation sector emissions attributed to a small increase in fuel efficiency across different transportation modes and limited new demand for passenger transportation, and much warmer winter conditions resulting in a decreased demand for heating fuel in the residential and commercial sectors. Since 1990, U.S. emissions have increased at an average annual rate of 0.2%.

The primary GHG emitted by human activities in the U.S. was CO₂ representing approximately 82.5% of total GHG emissions. The largest source of CO₂ and of overall GHG emissions was fossil fuel combustion. CH₄ emissions, which have decreased by 10.8% since 1990, resulted primarily from enteric fermentation associated with domestic livestock, natural gas systems, and decomposition of wastes in landfills. Agricultural soil management, manure management, mobile source fuel combustion and stationary fuel combustion were the major sources of NO₂ emissions.

HFCs and PFCs are families of synthetic chemicals that are used as alternatives to O₃ Depleting Substances (ODS), which are being phased out under the Montreal Protocol and Clean Air Act Amendments of 1990. HFCs and PFCs do not deplete the stratospheric O₃ layer, and are

therefore acceptable alternatives under the Montreal Protocol. These compounds, however, along with SF₆, are potent GHGs. In addition to having high global warming potentials, SF₆ and PFCs have extremely long atmospheric lifetimes, resulting in their essentially irreversible accumulation in the atmosphere once emitted. SF₆ is the most potent GHG the IPCC has evaluated (IPCC 2013). Other emissive sources of these gases include HCFC-22 production, electrical transmission and distribution systems, semiconductor manufacturing, aluminum production, and magnesium production and processing.

ODS substitute emissions and emissions of J-fluorocarbon (JFC)-23 during the production of JCFS-22 were the primary contributors to aggregate HFC emissions. PFC emissions resulted as a by-product of primary aluminum production and from semiconductor manufacturing, while electrical transmission and distribution systems accounted for most SF₅ emissions.

Overall, from 1990 to 2012, total emissions of CO₂ increased by 274.5 Tg CO_{2e} (5.4%), while total emissions of CH₄ decreased by 68.4 Tg CO_{2e} (10.8%), and N₂O increased by 11.5 Tg CO_{2e} (2.9%). During the same period, aggregate weighted emissions of HFCs, PFCs, and SF₆ rose by 74.8 Tg CO_{2e} (83%). From 1990 to 2012, HFCs increased by 114.3 Tg CO_{2e} (309.6%), PFCs decreased by 15.2 Tg CO_{2e} (732.8%), and SF₆ decreased by 24.2 Tg CO_{2e} (74.3%). Despite being emitted in smaller quantities relative to the other principal GHGs, emissions of JFCs, PFCs, and SF₆ are significant because many of these gases have extremely high global warming potentials and, in the cases of PFCs and SF₆, long atmospheric lifetimes. Conversely, U.S. GHG emissions were partly offset by carbon sequestration in forests, trees in urban areas, agricultural soils, and landfilled yard trimmings and food scraps, which, in aggregate, offset 15% of total emissions in 2012.

Within the U.S., fossil fuel combustion accounted for 94.2% of CO₂ emissions in 2012. Globally, approximately 32,579 Tg of CO₂ were added to the atmosphere through the combustion of fossil fuels in 2011, of which the U.S. accounted for about 17%. Changes in land use and forestry practices can also emit CO₂ (e.g. through conversion of forest land to agricultural or urban use) or can act as a sink for CO₂ (e.g. through net additions to forest biomass). In addition to fossil fuel combustion, several other sources emit significant quantities of CO₂. These sources include, but are not limited to non-energy use of fuels, iron and steel production and cement production.

The five major fuel consuming sectors contributing to CO₂ emissions from fossil fuel combustion are electricity generation, transportation, industrial, residential, and commercial. CO₂ emissions are produced by the electricity generation sector as they consume fossil fuel to provide electricity to one of the other four sectors, or “end-use” sectors. For the discussion below, electricity generation emissions have been distributed to each end-use sector on the basis of each sector’s share of aggregate electricity consumption. This method of distributing emissions assumes that each end-use sector consumes electricity that is generated from the national average mix of fuels according to their carbon intensity.

Transportation End-Use Sector. When electricity-related emissions are distributed to economic end-use sectors, transportation activities accounted for 34.4% of U.S. CO₂ emissions from fossil fuel combustion in 2012. The largest sources of transportation GHGs in 2012 were passenger cars (43.1%), light duty trucks, which include sport utility vehicles, pickup trucks, and minivans

(18.4%), freight trucks (21.9%), commercial aircraft (6.2%), rail (2.5%), and ships and boats (2.2%). These figures include direct emissions from fossil fuel combustion used in transportation and emissions from non-energy use (i.e. lubricants) used in transportation, as well as HFC emissions from mobile air conditioners and refrigerated transport allocated to these vehicle types.

In terms of the overall trend, from 1990 to 2012, total transportation emissions rose by 18% due, in large part, to increased demand for travel with limited gains in fuel efficiency over the same time period. The number of vehicle miles traveled by light-duty motor vehicles (passenger cars and light-duty trucks) increased 35% from 1990 to 2012, as a result of a confluence of factors including population growth, economic growth, urban sprawl, and low fuel prices during the beginning of this period. Almost all of the energy consumed for transportation was supplied by petroleum-based products, with more than half being related to gasoline consumption in automobiles and other highway vehicles. Other fuel uses, especially diesel fuel for freight trucks and jet fuel for aircraft, accounted for the remainder. The primary driver of transportation-related emissions was CO₂ from fossil fuel combustion, which increased by 16% from 1990 to 2012. This rise in CO₂ emissions, combined with an increase in HFCs from close to zero emissions in 1990 to 72.9 Tg CO_{2e} in 2012, led to an increase in overall emissions from transportation activities of 18%.

Industrial End-Use Sector. Industrial CO₂ emissions, resulting both directly from the combustion of fossil fuels and indirectly from the generation of electricity that is consumed by industry, accounted for 27% of CO₂ from fossil fuel combustion in 2012. Approximately 57% of these emissions resulted from direct fossil fuel combustion to produce steam and/or heat for industrial processes. The remaining emissions resulted from consuming electricity for motors, electric furnaces, ovens, lighting, and other applications. In contrast to the other end-use sectors, emissions from industry have steadily declined since 1990. This decline is due to structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and efficiency improvements.

In 2012, CH₄ emissions from coal mining were 55.8 Tg CO_{2e}, which is a 4.0 Tg CO_{2e} (6.7%) decrease below 2011 emission levels. The overall decline of 25.2 Tg CO_{2e} (31.1%) from 1990 results from the mining of less gassy coal from underground mines and the increased use of CH₄ collected from degasification systems.

N₂O is produced by biological processes that occur in soil and water and by a variety of anthropogenic activities in the agricultural, energy-related, industrial, and waste management fields. While total N₂O emissions are much lower than CO₂ emissions, N₂O is approximately 300 times more powerful than CO₂ at trapping heat in the atmosphere (IPCC 2013). Since 1750, the global atmospheric concentration of N₂O has risen by approximately 20% (IPCC 2013). The main anthropogenic activities producing N₂O in the U.S. are agricultural soil management, stationary fuel combustion, fuel combustion in motor vehicles, manure management and nitric acid production.

Emissions resulting from the substitution of ODS (e.g., CFCs) have been consistently increasing, from small amounts in 1990 to 146.8 Tg CO_{2e} in 2012. Emissions from ODS substitutes are both

the largest and the fastest growing source of HFC, PFC, and SF₆ emissions. These emissions have been increasing as phase-out of ODS required under the Montreal Protocol came into effect, especially after 1994, when full market penetration was made for the first generation of new technologies featuring ODS substitutes.

GWP-weighted PFC, HFC, and SF₆ emissions from semiconductor manufacture have increased by 28% from 1990 to 2012 due to the rapid growth of this industry and the increasing complexity of semiconductor products (more complex devices have a larger number of layers that require additional F-GHG using process steps). Within that time span, emissions peaked in 1999, the initial year of the EPA's PFC Reduction/Climate Partnership for the Semiconductor Industry, but have since declined to 3.7 Tg CO_{2e} in 2012 (a 48% decrease relative to 1999).

The National Climate Assessment is a document that summarizes the impacts of climate on the U.S. now and in the future. Over 300 experts working with a 60 member Federal Advisory Committee created the report. Major consequences of a warming climate, as discussed in the National Climate Assessment include significant increases in the number of hot days (95°F or above) and decreases in freezing events. Higher temperatures contribute to the formation of harmful air pollutants and allergens. Higher temperatures are also projected to reduce livestock and crop productivity. Climate change is expected to increase harmful blooms of algae and several disease-causing agents in inland and coastal waters. The number of Category 4 and 5 hurricanes in the North Atlantic and the amount of rain falling in very heavy precipitation events have increased over recent decades, and further increases are projected.

Global sea level rose about eight inches in the last century and is projected to rise another 1 to 4 feet in this century. Large numbers of southeastern cities, roads, railways, ports, airports, oil and gas facilities, and water supplies are vulnerable to the impacts of sea level rise. Major cities like New Orleans, with roughly half of its population below sea level, Miami, Tampa, Charleston, and Virginia Beach are among those most at risk. As a result of current sea level rise, the coastline of Puerto Rico around Rincón is being eroded at a rate of 3.3 feet per year. Puerto Rico has one of the highest population densities in the world, with 56% of the population living in coastal municipalities.

Sea level rise and storm surge can have impacts far beyond the area directly affected. Sea level rise combines with other climate-related impacts and existing pressures such as land subsidence, causing significant economic and ecological implications. According to a recent study co-sponsored by a regional utility, coastal areas in Alabama, Mississippi, Louisiana, and Texas already face losses that annually average \$14 billion from hurricane winds, land subsidence, and sea level rise. Losses for the 2030 timeframe could reach \$23 billion assuming a nearly 3% increase in hurricane wind speed and just under 6 in of sea level rise. About 50% of the increase in losses is related to climate change. LA State Highway 1, heavily used for delivering critical oil and gas resources from Port Fourchon, is sinking, at the same time sea level is rising, resulting in more frequent and more severe flooding during high tides and storms. A 90-day shutdown of this road would cost the nation an estimated \$7.8 billion.

Freshwater supplies from rivers, streams, and groundwater sources near the coast are at risk from accelerated saltwater intrusion due to higher sea levels. Porous aquifers in some areas make them particularly vulnerable to saltwater intrusion. For example, officials in the city of Hallandale

Beach, Florida, have already abandoned six of their eight drinking water wells. Continued urban development and increases in irrigated agriculture will increase water demand while higher temperatures will increase evaporative losses. All of these factors will combine to reduce the availability of water in the Southeast. Severe water stress is projected for many small Caribbean islands.

While recognizing that many factors besides climate change affect energy demand (including population changes, economic conditions, energy prices, consumer behavior, conservation programs, and changes in energy-using equipment), increases in temperature will result in increased energy use for cooling and decreased energy use for heating. These impacts differ among regions of the country and indicate a shift from predominantly heating to predominantly cooling in some regions with moderate climates. For example, in the Northwest, energy demand for cooling is projected to increase over the next century due to population growth, increased cooling degree days, and increased use of air conditioners as people adapt to higher temperatures. Population growth is also expected to increase energy demand for heating. However, the projected increase in energy demand for heating is about half as much when the effects of a warming climate are considered along with population growth.

In sum, the cumulative impacts may result in a very small increase in GHG emissions but are not expected to create climate change impacts that differ from the No Action Alternative because climate change is a global process that is impacted by the sum total of GHGs in the Earth's atmosphere. The incremental contribution to global GHGs from the proposed action cannot be translated into effects on climate change globally or in the area of this site-specific action. It is currently not feasible to predict with certainty the net impacts from particular emissions associated with a federal action; however, EPA's recently finalized oil and gas air quality regulations have a co-benefit of CH₄ reduction that will reduce GHG emissions from any oil and gas development that would occur on this lease.

4.8 Water Quality, Surface/Ground

While the act of leasing federal minerals would produce no impacts to water resources, subsequent exploration and development of the lease parcel could produce impacts. The physical effects of mineral extraction include erosion, compaction, sedimentation, and potential groundwater contamination. Sedimentation and pollution of streams or wetlands can occur down-gradient from such activity sites (USDA 1999). If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. Surface disturbance from the construction of well pads, access roads, pipelines, and utility corridors can result in degradation of surface water and groundwater quality from non-point source pollution, increased soil losses, and increased erosion.

4.8.1 Surface Water Resources

There are no water bodies located on the lease parcel, however Bayou Boeuf is located ~ 0.25 miles east of the tract. If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site.

However it is possible that disturbance could occur on the lease site. A road, multiple buildings, and cleared areas are located between the Bayou and the proposed parcel. As a result, erosion or run-off that could potentially occur from surface disturbance on the proposed lease would likely stop at the road and not water quality in the Bayou.

4.8.2 Ground Water Resources

Groundwater could be affected by multiple factors, including industrial, domestic, or agricultural activities through withdrawal, injection (including chemical injection), or mixing of materials from different geologic layers or the surface. Withdrawal of groundwater could affect local groundwater flow patterns and create changes in the quality or quantity of the remaining groundwater. Based on an evaluation of statewide groundwater availability, and the total projected number of wells to be drilled/completed on lands with federal mineral ownership, adequate water supplies are available and would not result in significant impacts on a regional basis. Loss of a permitted source of groundwater supply due to drawdown would be considered a significant impact if it were to occur. This potential would be assessed at the development stage should development be proposed. The drilling of horizontal wells, versus directional and vertical wells may initially appear to require a greater volume of water for drilling/completion purposes. However, a horizontal well develops a much larger area of the reservoir than a directional and/or vertical well and actually results in a lesser volume of fluids being required. Vertical and directional wells can easily require one well per 10 acres resulting in 64 wells per section. This is in contrast to one horizontal well per 640 acres or one per 320 acres which results in a net decrease in total fluid volumes needed and in surface disturbance acreages. Impacts to the quality of groundwater, should they occur, would likely be limited to near a well bore location due to inferred groundwater flow conditions in the area of the parcels.

Hydraulic fracturing would not occur for wells that could be drilled to extract the federal minerals.

Contamination of groundwater could occur without adequate cementing and casing of the proposed well bore. For fracturing fluid to escape the wellbore and affect the usable quality water or contaminate or cross contaminate aquifers, the fluid would have to breach several layers of steel casing and cement. Failure of the cement or casing surrounding the wellbore is a possible risk to water supplies. If the annulus is improperly sealed, natural gas, fracturing fluids, and formation water containing high concentrations of dissolved solids may be transferred directly along the outside of the wellbore among the target formation, drinking water aquifers, and layers of rock in between. Complying with BLM and state regulations regarding casing and cementing, implementing BMPs, testing casings and cement prior to continuing to drill or introducing additional fluids and continual monitoring during drilling and hydraulic fracturing, allow producers and regulators to check the integrity of casing and cement jobs and greatly reduce the chance of aquifer contamination.

Casing specifications are designed and submitted to the BLM. The BLM independently verifies the casing program, and the installation of the casing and cementing operations are witnessed by a Petroleum Engineer. Petroleum products and other chemicals used in the drilling and/or completion process could result in groundwater contamination through a variety of operational

sources including but not limited to pipeline and well casing failure, well (gas and water) construction, and spills. Similarly, improper construction and management of reserve and evaporation pits could degrade ground water quality through leakage and leaching.

Any proposed drilling/completion activities would have to be in compliance with Onshore Order #2, 43 CFR 3160 regulations, and not result in a violation of a federal and/or state law. If these conditions were not met, the proposal would be denied. As such, no significant impacts to groundwater from the proposed action are expected. Cumulative effects to ground water are not anticipated. If the BLM COAs as outlined below are followed during the APD process, cumulative impacts to ground water should not occur.

4.8.3 Mitigation

EPA requires that Storm Water Pollution Prevention Plans and SPCCP be in place to prevent any spill from reaching surface water due to rain events or accidental release of fluids related to production operations. In addition, an adequate amount of sediment control measures should be in place throughout the well location and access right-of-way so that all sediment and debris is removed prior to discharging any water runoff on or from the project area.

BLM also recommends BMPs requiring fluid impermeable containment systems (i.e. liners, dikes, berms) be placed in, under and/or around any tank, pit, drilling cellar, or ditches associated with the drilling process, or other equipment that use or has the potential to leak/spill hazardous and non-hazardous fluids, to prevent chemicals from penetrating the soil and impacting the aquifer or from moving off-site to a surface water source.

4.9 Floodplains/Riparian Areas/Wetlands

There are no floodplain, riparian, or wetland areas on the proposed lease and therefore the proposed project would have no effect on these systems.

4.10 Invasive/Exotic Species

While the act of leasing federal minerals would not contribute to the spread or control of invasive or non-native species, subsequent exploration/development of the proposed lease may. If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. Any surface disturbance could establish new populations of invasive non-native species, although the probability of this happening cannot be predicted using existing information. Noxious weed seeds can be carried to and from the project areas by construction equipment, the drilling rig and transport vehicles. At the APD stage, BLM requirements for use of weed control strategies would minimize the potential for the spread of these species.

4.10.1 Mitigation

Mitigation is deferred to site-specific development at the APD stage. BMPs require that all federal actions involving surface disturbance or reclamation take reasonable steps to prevent the introduction or spread of noxious weeds, including requirements to use weed-free hay, mulch and straw. A BLM COA applies to all APDs which recommends that native cover plants in seeding mixtures be used during reclamation activities. Post-construction monitoring for cogon grass and other invasive plant species should be conducted to ensure early detection and control. If invasive species are found, the proper control techniques should be used to either eradicate the species from the area or minimize its spread to other areas. If cogon grass is found on site, equipment should be washed before exiting the site to prevent the spread of this highly invasive species to other locations.

4.11 Special Status Species

There is no suitable habitat on the proposed parcel for ten of the eleven listed species documented to occur in St. Mary Parish. The Louisiana black bear is the only species documented to occur in St. Mary Parish with the potential to occur on the proposed lease site due to availability of suitable habitat. As a result, BLM has determined that the proposed lease would have no effect on any listed species documented to occur in St. Mary Parish except for the Louisiana black bear. Informal consultation with FWS, LA Ecological Services occurred on November 19, 2014. FWS responded on December 8, 2014 stating that they concur with BLM's determination that there will be no effect from the proposed project for any listed species documented to occur in St. Mary Parish except for the Louisiana black bear and that the proposed project may effect, but is not likely to adversely affect the Louisiana black bear (Appendix C).

A request was submitted to the LNHP on November 12, 2014 to review their files for records indicating the occurrence of rare plants and animals, outstanding natural communities, natural or scenic rivers, or other elements of special concern within or near the project site. A response was received on November 20, 2014 stating that no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at the proposed sites.

4.11.1 Mitigation Relevant to All Special Status Species

Due to potential future changes in species habits, habitat needs, and our knowledge thereof, a BLM stipulation regarding rare species apply to this proposal. The BLM stipulation states that the BLM may recommend modifications to exploration and development proposals to further the conservation and management objectives for threatened, endangered, or other special status plant or animal species or their habitat to avoid BLM-approved activity that would contribute to a need to list such a species or their habitat. To protect threatened, endangered, candidate, proposed, and BLM sensitive plant species, a second stipulation applies to this lease. The stipulation states that all suitable special status plant species habitat will be identified during environmental review of any proposed surface use or activity. If field examination indicates that habitat of one or more of these species is present, the BLM will require a survey by a qualified

botanist for special status plants during periods appropriate to each species. Operations will not be allowed in areas where sensitive plants would be affected.

4.12 Vegetation and Wildlife

While the act of leasing federal minerals would produce no direct impacts to wildlife, subsequent development of a lease may produce impacts. If development of the federal minerals were to occur on the proposed lease, wells would likely be drilled from an existing well pad located 0.14 miles east of the site. However it is possible that disturbance could occur on the lease site. Impacts could result from increased habitat fragmentation, noise, or other disturbance during development. Although reclamation and restoration efforts for surface disturbance could provide for the integrity of other resources, these efforts may not always provide the same habitat values (e.g. structure, composition, cover, etc.) in the short or in some instance, the long-term, in complex vegetative community types (e.g., shrub oak communities). Short-term negative impacts to wildlife would occur during the construction and production phase of the operation (drilling, fracturing, production, etc.) due to noise and habitat destruction. In general, most wildlife species would become habituated to the new facilities. For other wildlife species with a low tolerance to activities, the operations on the well pad would continue to displace wildlife from the area due to ongoing disturbances such as vehicle traffic, noise and equipment maintenance. The magnitude of above effects would be dependent on the rate and location of the oil and gas development, but populations could likely not recover to pre-disturbance levels until the activity was completed and vegetative community restored. Cumulative effects on wildlife and vegetation from potential development on the proposed leases could include an overall loss of suitable habitat.

The RFD for EOI # 1734 predicts that multiple federal wells may be drilled from an existing pad. An existing pad is located 0.14 miles east of the proposed parcel. The total disturbance predicted would be 4.02 acres, with 3.67 acres disturbed for the well pad and pit, 0.69 acres for the access road, and 0.34 acres reclaimed. (Appendix D). If development occurs for this lease, wells would likely be drilled from a nearby existing pad in which case the predicated disturbance has already occurred and there would be no additional disturbance. Development could potentially occur however in the southern quarter of the proposed lease site.

Many of the common species expected to occur on the lease parcel have broad habitat requirements and would continue to be found in a variety of habitats in the surrounding areas. Wildlife use of the site after the well is put into production would vary depending on vegetation and succession stage. Once put into production, the well pad would be reduced in size and the reserve pit would be graded and seeded. The producing well site would be subject to regular maintenance and inspection. Wildlife use of the site is dependent on the adequacy of restoration. However, over the life of the well, some of the acreage would be excluded from utilization by most wildlife species.

4.12.1 Mitigation Common to All Species

Measures would be taken to prevent, minimize, or mitigate impacts to fish and wildlife animal species from exploration and development activities. Prior to authorization, activities would be evaluated on a case-by-case basis, and the project would be subject to mitigation measures.

Mitigation could potentially include rapid re-vegetation, noise restrictions, project relocation, or pre-disturbance wildlife species surveying.

A standard BLM COA would apply at the APD stage that is designed to prevent bat and bird mortality. The COA states that all open vent stack equipment, such as heater-treaters, separators, and dehydrator units, will be designed and constructed to prevent birds and bats from entering or nesting in or on such units, and to the extent practical, to discourage birds from perching on the stacks. Installing cone-shaped mesh covers on all open vents is one suggested method. Flat mesh covers are not expected to discourage perching and will not be acceptable.

4.13 Migratory Bird Species of Concern

While the act of issuing the proposed lease produces no impacts to migratory birds, subsequent exploration/development of the subject parcel may produce impacts. Surface disturbance from the development of well pads, access roads, pipelines, and utility lines can result in an impact to migratory birds and their habitat. Cumulative effects on migratory birds could increase as oil and gas development increases in the area. The extent of the effect will be dependent on the amount of increase in development.

FWS estimates that many migratory birds are killed annually throughout the U.S. in oil field production skim pits, reserve pits, and centralized oilfield wastewater disposal facilities. Numerous grasshoppers, moths, June bugs, and the like become trapped on the surface in tanks and on pits, and become bait for many species of migratory birds. Open tanks and pits then become traps to many species of birds protected under the MBTA. Properly covered tanks and pits (and regularly inspected covered tanks and pits) is imperative to the continued protection of migratory birds in the well pad area.

4.13.1 Mitigation

Per the MOU between BLM and FWS, entitled, “To Promote the Conservation of Migratory Birds,” the following temporal and spatial conservation measures must be implemented as part of the COAs with an APD:

1. Avoid any take of migratory birds and/or minimize the loss, destruction, or degradation of migratory bird habitat while completing the proposed project or action.
2. If the proposed project or action includes a reasonable likelihood that take of migratory birds will occur, then complete actions that could take migratory birds outside of their nesting season. This includes clearing or cutting of vegetation, grubbing, etc. The primary nesting season for migratory birds varies greatly between species and geographic location, but generally extends from early April to mid-July. However, the maximum time period for the migratory bird nesting season can extend from early February through late August. Strive to complete all disruptive activities outside the peak of migratory bird nesting season to the greatest extent possible.

3. If no migratory birds are found nesting in the proposed project or action areas immediately prior to the time when construction and associated activities are to occur, then the project activity may proceed as planned.

To protect perch and roosting sites and terrestrial habitats for and to avoid potential impacts to migratory birds, the following standard BLM COAs would apply at the APD stage:

- Any reserve pit that is not closed within 10 days after a well is completed and that contains water must be netted or covered with floating balls, or another method must be used to exclude migratory birds
- All powerlines must be built to protect raptors and other migratory birds, including bald eagles, from accidental electrocution, using methods detailed by the Avian Power Line Interaction Committee

4.14 No Action Alternative

Under the No Action Alternative, the proposed lease parcel would not be made available for lease. There would be no subsequent impacts from oil and/or gas construction, drilling, and production activities. The No Action Alternative would result in the continuation of the current land and resource uses in the proposed lease areas.

4.14.1 Environmental Justice

By not offering the proposed federal minerals for lease under the No Action Alternative, there may be negative effects on the overall employment opportunities related to the oil and gas and service support industry, as well as a loss of the economic benefits to state and parish governments related to royalty payments and severance taxes. However, there would be no increase in activity and noise associated with these leases unless the land is used for other purposes.

4.14.2 Cultural Resources and Native American Concerns

If the proposed lease is not made available and cultural resource surveys are not conducted, direct and indirect impacts may occur. Direct impacts are those such as completely destroying a site by “relic hunters” or by people picking up artifacts. Other direct impacts may be the mixing of layers in a site by plowing or the destruction of a site by land leveling. Indirect impacts are those such as after timber thinning or clear-cutting resulting in erosion of a site.

4.14.3 Mineral Resources

Under the No Action Alternative there would be no new impacts from oil and gas production on the lease parcel. Oil and gas development of federal, state, and private minerals would continue on the land surrounding the lease parcels. No additional natural gas or crude oil from the parcels would enter the public markets and no royalties would accrue to the federal or state treasuries. An assumption is that the No Action Alternative would not affect current domestic production of

oil and gas. However, this may result in reduced federal and state royalty income, and the potential for federal land to be drained by wells on adjacent private or state land. Oil and gas consumption is driven by a variety of complex interacting factors including energy costs, energy efficiency, availability of other energy sources, economics, demography, and weather or climate. If the BLM were to forego issuing the leases and potential development of the subject parcels, the assumption is that the public's demand for the resource would not be expected to change. Instead, the mineral resource foregone would be replaced in the short- and long-term by other sources that may include a combination of imports, using alternative energy sources (e.g. wind, solar), and other domestic production. This offset in supply would result in a no net gain for oil and gas domestic production.

4.14.4 All Other Resources

No other resources would be affected under the No Action Alternative, as there would be no surface disturbance that could detrimentally affect these resources. The No Action Alternative would result in the continuation of the current land and resource uses on the parcels.

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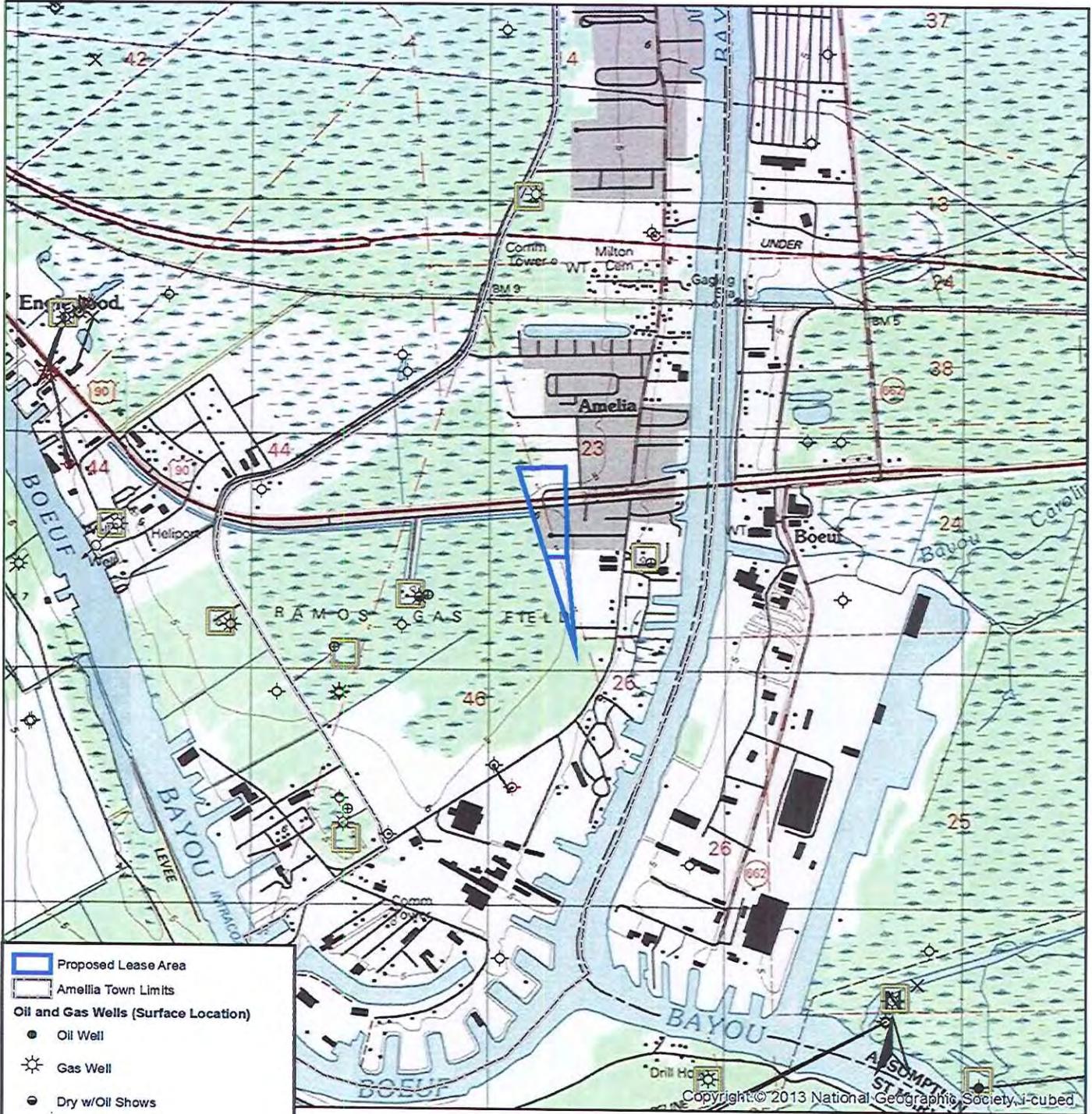
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APPENDIX A

Parcel Topographic Maps

Proposed Federal Oil and Gas Lease
EOI 1734



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- Proposed Lease Area
- Amelia Town Limits
- Oil and Gas Wells (Surface Location)**
- Oil Well
- Gas Well
- Dry w/Oil Shows
- Dry w/Gas Shows
- Dry Hole
- Injection
- Plugged Gas Well
- Abandoned Location
- Unclassified. Co2, etc.
- Oil and Gas Wells (Bottom Hole Location)**
- Dry w/Gas Shows
- Dry Hole
- Plugged Gas Well
- Inactive Well
- Well Bore Path



Proposed lease area
St. Mary Parish, Louisiana, Louisiana Meridian
T. 16S., R. 13E.,
Sec.23, Lots 7 and 8 - 19.88 acres

U.S. Department of the Interior
Bureau of Land Management
Eastern States
Southeastern States Field Office
Jackson, Mississippi

This map contains portions of the following USGS 1:24,000 Topographic Quadrangles: Morgan City, Amelia
No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of this data for individual use or aggregate use with other data.

APPENDIX B

Proposed Lease Stipulations and Lease Notices

Stipulations

Cultural Resources and Tribal Consultation

Stipulation: This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. These obligations may include a requirement that you provide a cultural resources survey conducted by a professional archaeologist approved by the State Historic Preservation Office (SHPO). If currently unknown burial sites are discovered during development activities associated with this lease, these activities must cease immediately, applicable law on unknown burials will be followed and, if necessary, consultation with the appropriate tribe/group of federally recognized Native Americans will take place. The BLM may require modification to exploration or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.

Endangered Species

Stipulation: The lease area may now or hereafter contain plants, animals, or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that will contribute to a need to list such a species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. ' 1531 et seq., including completion of any required procedure for conference or consultation.

Exception: None

Modification: None

Waiver: None

Sensitive Plant Species

Stipulation (CSU): All suitable special status plant species habitat will be identified during environmental review of any proposed surface use activity. If field examination indicates that habitat of one or more of these species is present, the BLM will require a survey by a qualified botanist for special status plants during periods appropriate to each species. Operations will not be allowed in areas where sensitive plants would be affected.

Objective: To protect threatened, endangered, candidate, proposed, and BLM sensitive plant species.

Exception: An exception may be granted if the operator agrees to implement measures developed in consultation with USFWS and in coordination with State agencies.

Modification: The stipulation may be modified if it is determined that a portion of the lease area does not contain sensitive plant species habitat.

Waiver: The stipulation may be waived if, based on field surveys, it is determined that the lease area does not contain sensitive plant species habitat.

Lease Notices/Best Management Practices

Migratory Birds and Federally Listed Wildlife

Objective: To protect perch and roosting sites and terrestrial habitats for and to avoid potential impacts to migratory birds and federally listed wildlife.

Any reserve pit that is not closed within 10 days after a well is completed and that contains water must be netted or covered with floating balls, or another method must be used to exclude migratory birds.

All powerlines must be built to protect raptors and other migratory birds, including bald eagles, from accidental electrocution, using methods detailed by the Avian Power Line Interaction Committee (APLIC 2006)

Perching and Nesting Birds and Bats

Objective: To prevent birds and bats from entering or nesting in or on open vent stack equipment.

Open vent stack equipment, such as heater-treaters, separators, and dehydrator units, will be designed and constructed to prevent birds and bats from entering or nesting in or on such units and, to the extent practical, to discourage birds from perching on the stacks. Installing cone-shaped mesh covers on all open vents is one suggested method. Flat mesh covers are not expected to discourage perching and will not be acceptable.

Invasive and Non-Native Species

Objective: To discourage the spread of invasive, non-native plants.

Use of native or non-invasive plants in seeding mixtures will be encouraged to stabilize disturbed areas and during restoration activities. Construction sites will be surveyed for invasive species prior to ground disturbance. If invasive species are found, the proper control measures will be used to either eradicate the species from the area or minimize its spread to other areas. If cogongrass is found on site, equipment will be washed before exiting the site to prevent the spread of this highly invasive species to other locations. Post-construction monitoring for cogongrass and other invasive plant species should be conducted to ensure early detection control. In the case of split-estate lands, final seed mixtures will be formulated in consultation with the private landowner.

Pesticide Application

Objective: To protect the water quality of watersheds and natural stream substrate and morphology supporting special status species and their host species.

Any ground application of herbicides or other pesticides, sterilants, or adjuvants within 150 feet of listed species or habitat will require site-specific control measures developed in coordination or formal consultation with USFWS. No aerial application of herbicides or pesticides will be permitted.

Produced Water Disposal

Objective: To protect water quality, aquatic habitats, and special status species.

The preferred method for disposal of produced water will be through reinjection to a permeable formation with total dissolved solids (TDS) content higher than 10,000 milligrams per liter (mg/L), and that is not hydrologically connected to caves, wetlands, or surface water. Injection of produced water is regulated by the Underground Injection Control (UIC) program administered by state agencies.

APPENDIX C

Correspondence



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

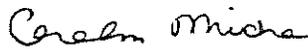
ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

Date November 20, 2014
Name Alison McCartney
Company Bureau of Land Management
Street Address 411 Briarwood Drive, Suite 404
City, State, Zip Jackson, MS 39206
Project EOI # 761, 1734 & 1832
Project ID 2922014
Invoice Number 14112011

Personnel of the Coastal & Nongame Resources Division have reviewed the preliminary data for the captioned project. After careful review of our database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at the specified site within Louisiana's boundaries.

The Louisiana Natural Heritage Program (LNHP) has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. Heritage reports summarize the existing information known at the time of the request regarding the location in question. The quantity and quality of data collected by the LNHP are dependent on the research and observations of many individuals. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in Louisiana have not been surveyed. This report does not address the occurrence of wetlands at the site in question. Heritage reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. LNHP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time Heritage tracked species are encountered within the project area, please contact the LNHP Data Manager at 225-765-2643. If you have any questions, or need additional information, please call 225-765-2357.

Sincerely,

for 
Amity Bass, Coordinator
Natural Heritage Program



United States Department of the Interior



FISH AND WILDLIFE SERVICE
646 Cajundome Blvd.
Suite 400
Lafayette, Louisiana 70506

December 3, 2014

RECEIVED

DEC - 3 2014

Ms. Alison McCartney
Permit Section Chief, Regulatory Branch
Bureau of Land Management
411 Briarwood Drive
Jackson, MS 39206

Dear Ms. McCartney:

Please reference your November 20, 2014, electronic mail (e-mail) and attached Biological Assessment (BA) requesting initiation of informal consultation under Section 7 of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) for oil and gas lease nominations in St. Mary Parish, Louisiana. The Fish and Wildlife Service (Service) has reviewed the information and offers the following comments in accordance with the ESA.

The Bureau of Land Management (BLM) received an "Expressions of Interest" (EOI) requesting the opportunity to lease federal minerals located under privately owned surface. The competitive lease provides exclusive rights to develop the federal oil and gas resources, but does not obligate the company to drill a well on the federal mineral estate. Although the proposed lease would give the lessee exclusive rights to explore and develop oil and gas reserves, it does not in itself authorize surface disturbing activities. An Application for Permit to Drill (APD) is filed by the lessee with BLM seeking the right to engage in ground disturbing activities, including site preparation and drilling of one or more wells. In the APD, the company identifies proposed drill sites and provides specific details on how and when they propose to drill the wells. Site-specific ESA consultation would occur at the APD stage, if necessary. In cases where a listed species may be affected by drilling and ground disturbing activities, a site-specific BA would be written and needed surveys would be conducted before activities are initiated. Documentation is submitted to the Service for consultation along with BLM's ESA effects determination and a request for our concurrence. According to the BA, the lessee is required, as per lease stipulations or notifications, to comply with the recommendations of the ESA consultation.

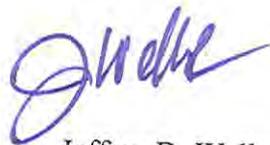
According to the BA, EOI #1734 is 19.88 acres in the town of Amelia. Seventy-five percent of the EOI is developed property, and 25% of the tract (approximately 5 acres) is wooded with northern oak, sweetbay, mockernut hickory, and water oak being the dominant species. The Service concurs with your determination of no effect for the following species: (1) the

endangered West Indian manatee (*Trichechus manatus*), (2) the threatened piping plover (*Charadrius melodus*), (3) the proposed red knot (*Calidris canutus*), (4) the threatened Atlantic sturgeon (*Acipenser oxyrinchus*), (5) the endangered pallid sturgeon (*Scaphirhynchus albus*), and five species of listed sea turtles because this EOI does not provide suitable habitat.

The forested area in the EOI contains tree species that provide suitable cover and forage for the threatened Louisiana black bear (*Ursus americanus luteolus*) and is located in a parish where Louisiana black bears are known to occur, but is outside of the critical habitat and the breeding range for this species. The proposed project site is primarily developed land with 5 acres of wooded habitat. The surrounding area within 2 miles of the EOI is primarily developed property, and, overall, the habitat that would be suitable for bears in this area is highly fragmented. Thus, the Service concurs with your determination that implementation of the proposed project is not likely to adversely affect the Louisiana black bear.

We appreciate the opportunity to consult with you on the proposed project. If you need further assistance, please contact Ms. Monica Sikes of this office at 337/291-3118.

Sincerely,



Jeffrey D. Weller
Supervisor
Louisiana Ecological Services



United States Department of the Interior
Bureau of Land Management

Eastern States
Southeastern States Field Office
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206
<http://www.es.blm.gov>



IN REPLY REFER TO: 8100 (020) JMS EOI 1734, St. Mary Parish

Nov. 17, 2014

Ms. Pam Breaux
State Historic Preservation Officer
Louisiana Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-44247

Dear Ms. Breaux:

The Bureau of Land Management (BLM) has received an Expression of Interest (EOI 1734) to lease federal minerals under privately owned surface, i.e. split-estate minerals. The Bureau's Reasonably Foreseeable Development scenario (RFD) for this proposed lease is multiple wells from the existing pad on private surface with no more than 4.02 acres total, including access road, gathering line and reserve pit, to be disturbed accessing federal minerals. The legal locations of the approximately 19.88 acres of federal mineral tracts are as follows (map enclosed):

Louisiana Meridian

St. Mary Parish (Morgan City and Amelia Quadrangles)
T. 16 S., R.13 E., Sec. 23, Lots 7 and 8 (19.88 acres).

A review of the Louisiana Division of Archaeology site files shows sites within one mile of the proposed lease sale. Development locations have not been determined on a site-specific basis. Specific locations proposed for development are determined by the developer and surface owners. The BLM's surface responsibilities rest only within the boundaries of any proposed development.

The lease document will state that before the BLM approves any development proposal, a cultural resources survey that meets current professional standards and a report that meets Louisiana Division of Archaeology requirements will be required on a site-specific basis.



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The report must be approved by both the Louisiana Division of Archaeology and the BLM before any ground disturbing activities take place. Any needed consultation will be concluded before ground-disturbing activities begin.

Your concurrence of these procedures for Section 106 compliance is requested in 30 days. If you have any questions or concerns, please contact John M. Sullivan, Archeologist, at (601) 977-5439 or email at John_M_Sullivan@BLM.Gov.

Sincerely,
Original Signed
Duane Winters

Duane Winters, Assistant Field Manager
Division of Lands and Renewable Resources

Enclosure
1 Map

bc:

JFO CF & RF

ES RF

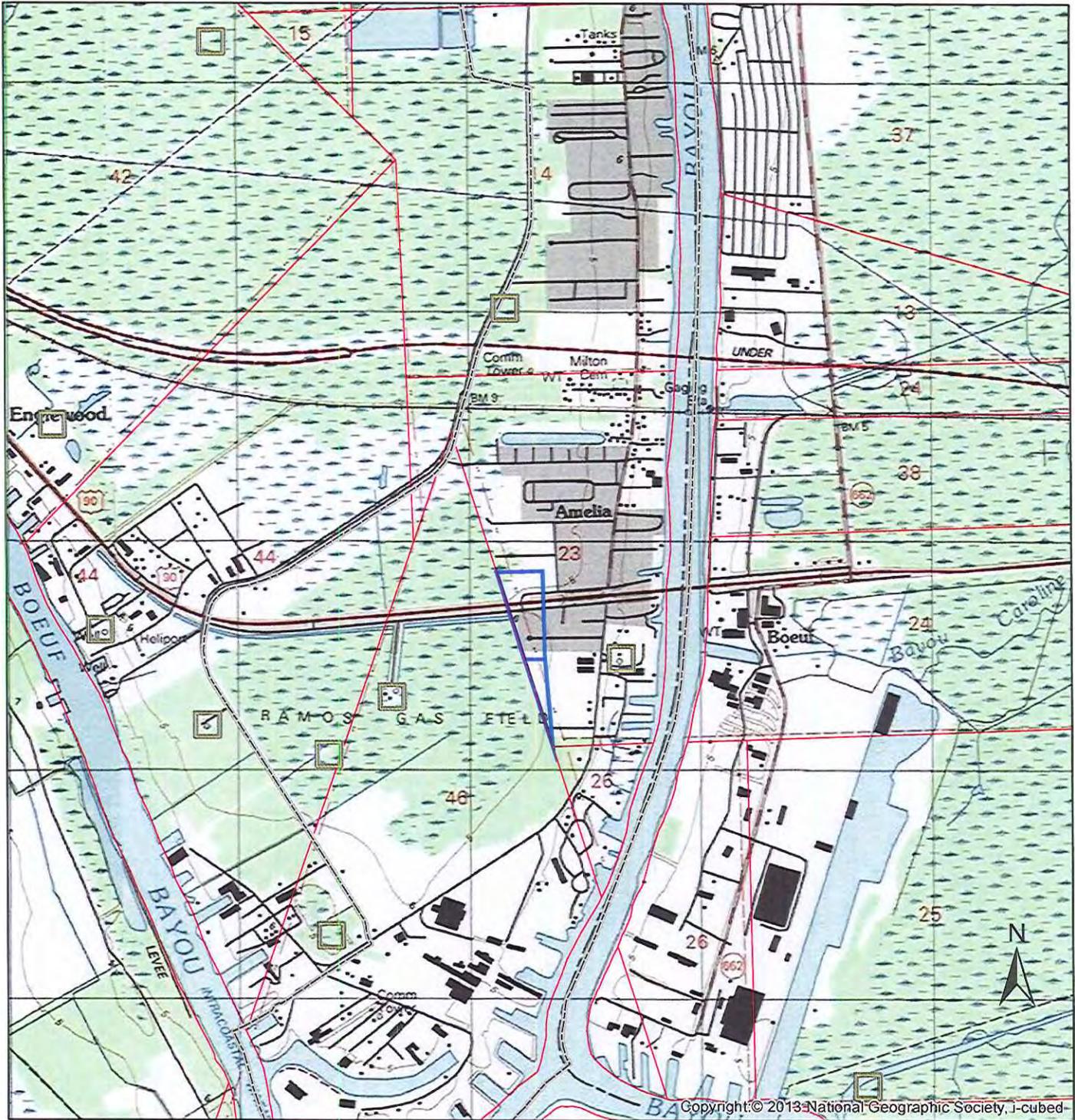
DWinters

AMcCartney

ES020: JMSullivan: 11/13/14:601-977-5400: St. Mary Parish T.16 S. R.13E Sec.23 EOI 1734 SHPO.Ltr



Proposed Federal Oil and Gas Lease
EOI 1734



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2,000 1,000 0 2,000 4,000 6,000 Feet

 Proposed Lease Area
 Amelia Town Limits
 Inactive Well

Proposed lease area
 St. Mary Parish, Louisiana, Louisiana Meridian
 T. 16S., R. 13E.,
 Sec. 23, Lots 7 and 8 - 19.88 acres

U.S. Department of the Interior
Bureau of Land Management
 Eastern States
 Southeastern States Field Office
 Jackson, Mississippi

This map contains portions of the following USGS 1:24,000 Topographic Quadrangles: Morgan City, Amelia

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of this data for individual use or aggregate use with other data.



United States Department of the Interior
Bureau of Land Management



Eastern States
Southeastern States Field Office
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206
<http://www.es.blm.gov>

IN REPLY REFER TO:
8100 (020) JMS EOI 1734, St. Mary Parish

Nov 17, 2014

Chairman Earl Barbry, Sr.
Tunica-Biloxi Tribe of Louisiana
P.O. Box 332
Marksville, Louisiana 70523

Dear Chairman Barbry:

The Bureau of Land Management (BLM) has received an Expression of Interest (EOI 1734) to lease federal minerals under privately owned surface, i.e. split-estate minerals. The Bureau's Reasonably Foreseeable Development scenario (RFD) for this proposed lease is multiple wells from the existing pad on private surface with no more than 4.02 acres total, including access road, gathering line and reserve pit, to be disturbed accessing federal minerals. The legal locations of the approximately 19.88 acres of federal mineral tracts are as follows (map enclosed):

Louisiana Meridian

St. Mary Parish (Morgan City and Amelia Quadrangles)
T. 16 S., R.13 E., Sec. 23, Lots 7 and 8 (19.88 acres).

A review of the Louisiana Division of Archaeology site files shows sites within one mile of the proposed lease sale. Development locations have not been determined on a site-specific basis. Specific locations proposed for development are determined by the developer and surface owners. The BLM's surface responsibilities rest only within the boundaries of any proposed development.

A section of the lease document will state that before the BLM approves any development proposal, a survey that meets current professional standards and a report that meets Louisiana Division of Archaeology requirements. The report must be approved by both the Louisiana Division of Archaeology and the BLM before any ground disturbing activities take place. Any needed consultation will be concluded before ground-disturbing activities begin.



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In addition, a stipulation will be included in the lease document which covers accidental discovery and requires additional consultation with you and the Louisiana Division of Archaeology. This stipulation will also be included in the permitting documents when, or if, a development proposal is submitted.

If you are aware of any sites within this proposed exploration area which is currently being used for religious purposes, or are recognized as sacred sites or traditional cultural properties (TCP's) on these privately owned lands, please let us know so that additional consultation can be conducted to avoid collateral impacts. As provided by law, any specific location information will be held in confidence. Your information is requested within 30 days.

If you have any questions or comments, please contact John M. Sullivan, Archeologist, at (601) 977-5439 or John_M_Sullivan@BLM.Gov.

Sincerely,
Original Signed
Bruce Dawson

Bruce Dawson
Field Manager

Enclosures
1 - Map

cc via email: Mr. Earl Barbry, Jr., THPO

bc:

JFO CF & RF

ES RF

DWinters

AMcCartney

ES020: JMSullivan: 11/13/14: 601-977-5400: St. Mary Parish T.16 S. R.13E Sec.23 EOI 1734 NA.Ltr



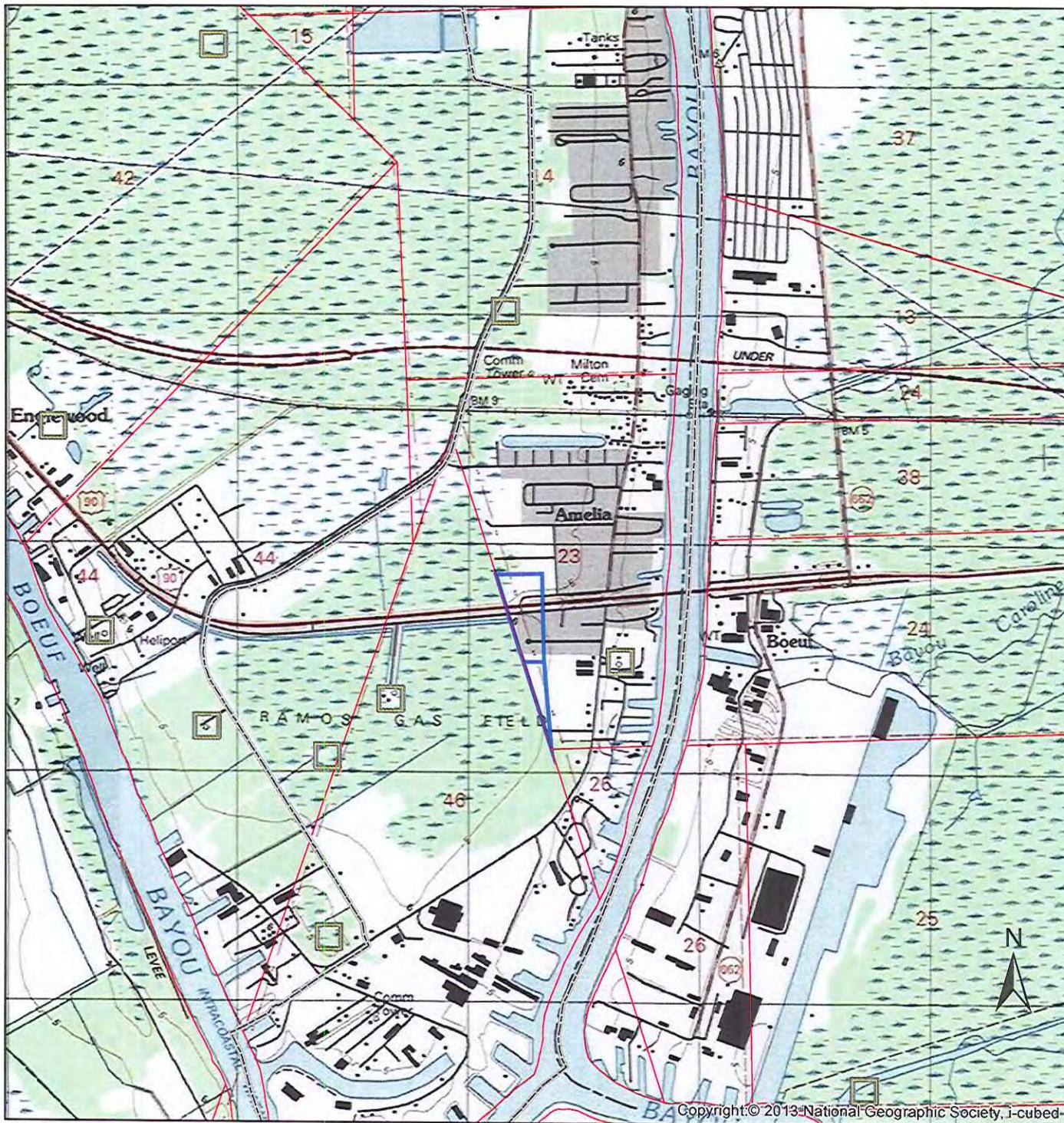
Original to:	cc: to these:
Marshall Pierite, Chairman Tunica-Biloxi Tribe of Louisiana P.O. Box 331 Marksville, Louisiana 70523	Mr. Earl Barbry, Jr., THPO Tunica - Biloxi Tribe 151 Melacon Dr. Marksville, LA 71351 earlii@tunica.org
Lovelin Poncho, Chairman Coushatta Indian Tribe P.O. Box 818 Elton, LA 70532	Send Hard Copy to Mike Tarpley Linda Langley, THPO Mike Tarpley, Deputy THPO P.O. Box 818 Elton, LA 70532 llangley@mcneese.edu ; kokua.aina57@gmail.com
John Paul Darden, Chairman Chitimacha Tribe of Louisiana P.O. Box 661 Charenton, LA 70523	Kimberly S. Walden, THPO Chitimacha Tribe of Louisiana P.O. Box 661 Charenton, LA 70523 337-923-9923 kim@chitimacha.gov
James E. Billie, Chairman 6300 Stirling Road Hollywood, Florida 33024	Dr. Paul N. Backhouse, THPO Bradley M. Mueller, M.A., Compliance Review Supervisor 30290 Josie Billie Hwy, PMB 1004 Clewiston, FL 33440 (863) 983-6549 (863) 983-6549 ext. 12262 paulbackhouse@semtribe.com ; bradleymueller@semtribe.com
B. Cheryl Smith, Chief Jena Band of Choctaw P.O. Box 2717 Jena LA 71342	Dana Masters, Tribal Council and THPO Jena Band of Choctaw P.O. Box 2717 Jena LA 71342 jbc.thpo.106@aol.com ; dmasters@jenachoctaw.org
Phyliss J. Anderson, Chief Mississippi Band of Choctaw Indians P.O. Box 6010 Philadelphia, MS 39350	Mr. Ken Carleton, Tribal Historic Preservation Officer Mississippi Band of Choctaw Indians P.O. Box 6257 Philadelphia, MS 39350 kcarleton@choctaw.org



Original to:	cc: to these:
<p>Only send email to Preservation Officer Gary Batton, Chief Choctaw Nation of Oklahoma Drawer 1210 Durant, Oklahoma 74702-1210</p>	<p>Ian Thompson PhD, RPA, THPO, Tribal Archaeologist, Director Historic Preservation Dept. Lindsey Bilyeu, Section 106 580-775-0914, 580-920-3181 (Fax) 1-800-522-6170 ext. 2216 P.O. Drawer 1210 Durant, OK 74702 ithompson@choctawnation.com; lbilyeu@choctawnation.com</p>
<p>Only send email to Preservation Officer Colabe III Clem Sylestine, Principal Chief Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, TX 77351</p>	<p>Bryant J. Celestine, Historic Preservation Office Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, TX 77351 celestine.bryant@actribe.org</p>
<p>George Scott, Mekko Thlopthlocco Tribal Town P.O. Box 188 Okemah, Oklahoma 74859 918-560-6198</p>	<p>Charles Coleman, THPO P.O. Box 188 Okemah, Oklahoma 74859 chasc Coleman75@yahoo.com 405-220-2185 (cell) 405-786-2579 (office/home)</p>
<p>Mekko Jeremiah Hobia Kialagee Tribal Town P.O. Box 332 Wetumka, OK 74883 Tel# (405) 452-3263, Fax# 452-3413 jeremiah.hobia@kialegetribe.net</p>	



Proposed Federal Oil and Gas Lease
EOI 1734



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2,000 1,000 0 2,000 4,000 6,000 Feet

-  Proposed Lease Area
-  Amelia Town Limits
-  Inactive Well

Proposed lease area
St. Mary Parish, Louisiana, Louisiana Meridian
T. 16S., R. 13E.,
Sec. 23, Lots 7 and 8 - 19.88 acres

U.S. Department of the Interior
Bureau of Land Management
Eastern States
Southeastern States Field Office
Jackson, Mississippi

This map contains portions of the following USGS 1:24,000 Topographic Quadrangles: Morgan City, Amelia

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of this data for individual use or aggregate use with other data.

APPENDIX D

RFD

REASONABLY FORESEEABLE DEVELOPMENT SCENARIO

Case File Number: EOI 1734

Project Number:

Acres: 19.88

Location: LA, St. Mary Parish, Louisiana Meridian, T16S, R13E, Sec. 23, Lots 7 & 8

I. Reasonably Foreseeable Development

A. RFD Baseline Scenario Assumptions and Discussion

Objective horizons are multiple Miocene sands down to 21,000'. Commodity is both oil and gas.

Federal acreage will be incorporated into a state determined drilling unit. Drilling and production units are of variable sizes.

A 30' wide well access road will be constructed consisting of a 16' wide travel surface with a 7' buffer on each side.

If productive, multiple wells may be drilled from the existing pad.

If productive, oil and gas handling and production facilities will be constructed on the existing pad.

If productive, the reserve pit and part of the drill pad will be reclaimed when drilling and completion activities are concluded.

All disturbed acreage will be reclaimed if the well is non-productive.

Water use is for drilling only – 10000 BW. NO Fracking for this well or wells.

B. Surface Disturbance Due to Oil and Gas Activity

Access Road: 0.69 acres (1000' X 30')

Well Pad & Pit: 3.67 acres (400' X 400')

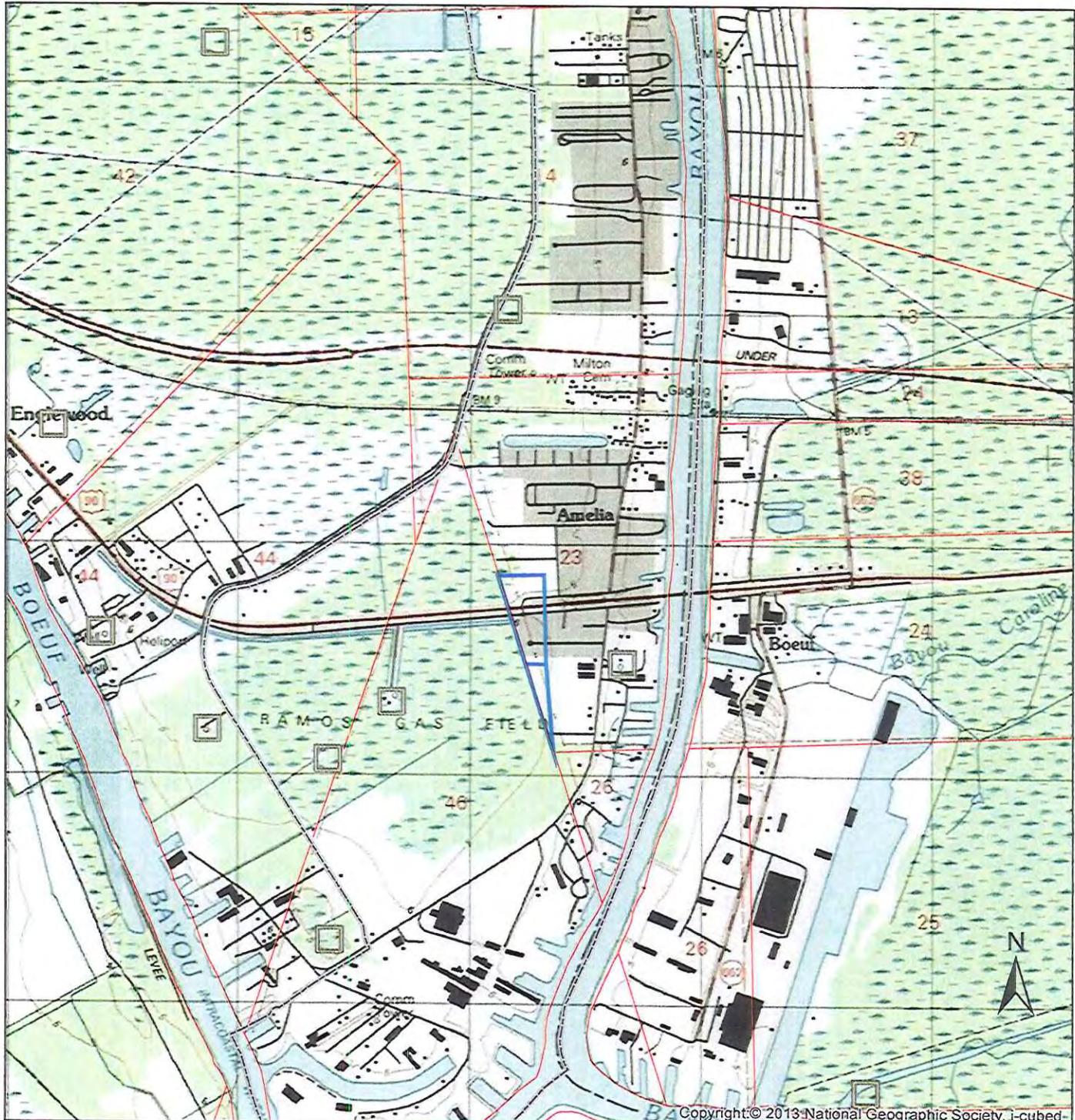
Utility and/or Pipeline R.O.W: 0 – use access road ROW

Initial Disturbance: 4.36 acres

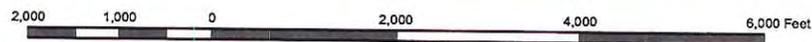
Partial Reclamation of Drill Site: 0.34 acres

Net Disturbance for Productive Well: 4.02 acres

Proposed Federal Oil and Gas Lease
EOI 1734



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APPENDIX E

Public Notice

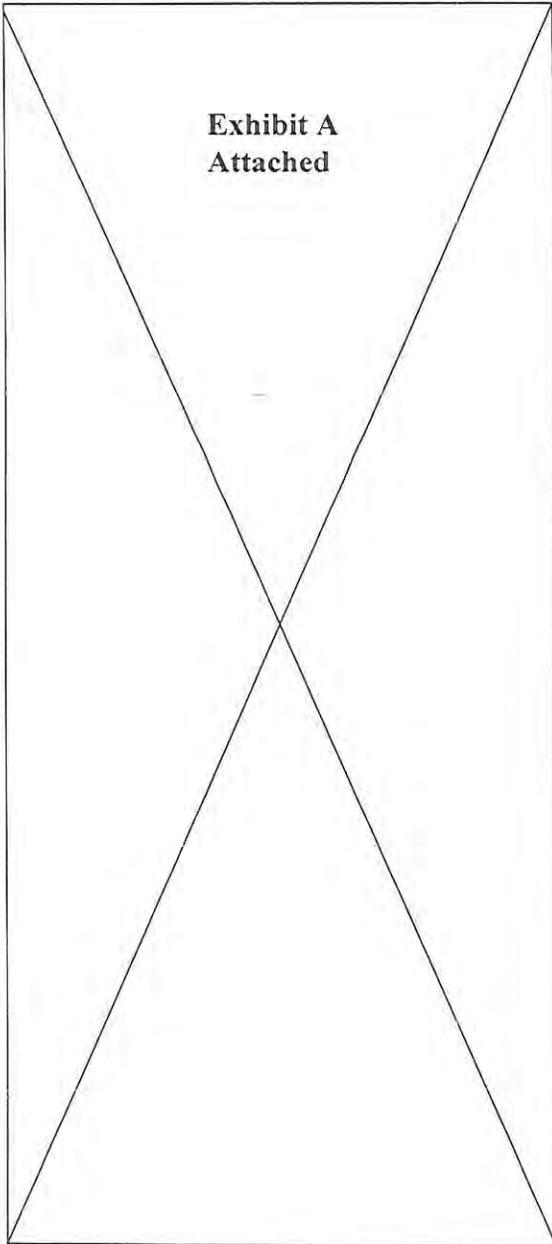


Exhibit A
Attached

State of Louisiana

Parish of Orleans

City of New Orleans

NOV 17 2014

Personally appeared before me, a Notary in and for the parish of Orleans, Randy A. Trahan who deposes and says that he is Administrative Operations Manager of NOLA Media Group, a division of The Times-Picayune, L.L.C., a Louisiana limited liability company, and Publishers of The Times-Picayune, Daily and Sunday, of general circulation; doing business in the City of New Orleans and the State of Louisiana, and that the attached

LEGAL

Re: Enviromental Assessment Document to consider leasing federally owned mineral estate for oil and gas

Advertisement of Bureau Of Land Management

411 Briarwood Drive, Ste 4
Jackson MS 39206

Was published in The Times Picayune

3800 Howard Ave.
New Orleans, LA 70125

On the following dates November 12,14

I attest that the copy attached hereto as "Exhibit A" is a true and correct copy of the advertisement published in The Times-Picayune on these dates.

14th

Sworn to and subscribed before me this Day of November, 2014

Notary Public

My commission expires at my death.

Charles A. Ferguson, Jr.

Notary identification number 23492