

United States
Department of the Interior
Bureau of Land Management

Miles City Field Office

Petro-Hunt, LLC
Federal Stringer #1
Addie Grandlund #1
Emergency Flaring

Determination of NEPA Adequacy
DOI-BLM-MT-C020-2013-0212-DNA

For Further Information Please Contact:

Bureau of Land Management
Miles City Field Office
111 Garryowen Road
Miles City, Montana 59301
406-233-2800

BLM



Worksheet
Documentation of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Miles City Field Office

NEPA Number: DOI-BLM-MT-C020-2010-212-DNA

Case File/Project No:

Proposed Action Title/Type: Petro-Hunt, LLC Emergency Flaring

Location/Legal Description: Federal Stringer #1, NWNE Section 14, T32N-R57E and
Addie Grandlund #1, NENE Section 14, T32N-R57E

A: Description of the Proposed Action: The proposed action is to allow the occasional flaring of casinghead natural gas produced by the above two wells when conditions exist such that the natural gas cannot be purchased by Oneok, Inc.

Applicant: Petro-Hunt, LLC
County: Sheridan County, Montana
DNA Originator: Paul Helland

B. Land Use Plan (LUP) Conformance

LUP Name* Big Dry RMP Date Approved April, 1996

Other document** EA for the Vess Oil 1-5H APD Date Approved 9-21-2011

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) Big Dry RMP, Page 325, Under **Seperating, Treating, and Storage**, this section states in part, “the gas can be flared or vented into the atmosphere when authorized by permit in accordance with state and federal regulations.”

C. Identify applicable National Environmental Policy Act (NEPA) document(s) and other related documents that cover the proposed action.

Big Dry RMP, [EA MT-020-2011-256-EA](#) for the Vess Oil 1-5H APD

D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?** This type of action is specifically discussed in the referenced RMP (the Big Dry RMP on page 325) and in the referenced EA. The volume of gas intermittently flared from the two wells is approximately 70-150 mcf/month. This request is to allow for continued intermittent flaring of the produced gas when Oneok, Inc. is not able to accept the gas due to high line pressure or Oneok facilities are temporarily down.
- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values?** Yes, the current circumstances and alternatives are similar to the situation analyzed in the referenced EA. The alternatives are to continue the occasional flaring of casing head gas or no action (not approve the continued release of gas). If this gas is not flared when Oneok, Inc. is not able to take the gas, the wells cannot produce oil. A portion of the gas produced from these wells is used on lease increasing efficiency and reducing flared volumes.
- 3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstance would not substantially change the analysis of the new proposed action?** Yes, the existing analysis is valid and the action is in the same airshed analyzed in the referenced EA and circumstances have not significantly changed regarding air quality in the area.
- 4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?** Yes, the effects are similar to the situation analyzed in the referenced EA. Also, this proposal is for intermittent flaring during emergencies and is not for continuous flaring of produced natural gas.
- 5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes, other appropriate agencies are involved. When the operator has approval to flare or vent from the BLM, the Conditions of Approval to vent or flare state, “This approval does not constitute approval via permit or rule to vent gas from the Oil and Gas Conservation Division, Department of Natural Resource and Conservation of the State of Montana or the Air Quality Division, Montana Department of Health and Environmental Sciences. Venting and flaring cannot occur unless it is in compliance with the aforementioned agencies’ permits and administrative rules.” Thus other agencies relevant to this action are involved as required.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>	<u>Initials & Date</u>
Paul Helland	Petroleum Engineer	Minerals	PH 9-3-13
David Breisch	Assistant Field Manager	Minerals	DJB 9/4/13



9/5/2013

Environmental Coordinator

Date

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

Please see attached COAs.

CONCLUSION

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

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked



Todd Yeager
Field Manager
Miles City Field Office

9/7/2013

Date