United States

Department of the Interior

Bureau of Land Management

BLM

Miles City Field Office

Denbury Onshore LLC

32X-21 Well Site Repair

Environmental Assessment (EA)
DOI-BLM-MT-C020-2013-0049-EA

For Further Information Please Contact:

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

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ENVIRONMENTAL ASSESSMENT REVIEW

OFFICE/AREA: Miles City Field Office	**DOI-BLM-MT-C020-2011-049-EA**
	DATE POSTED:
NAME: Denbury 32X-21 repair and stabilization, Gas City Unit, Dawson County, Montana	**DATE DUE:**
	FUNDING: Applicant
LOCATION: **T. 14 N., R. 55 E., SW¼ NE¼ Section 21, Dawson County, Montana**	

ORIGINATOR DATE/INITIALS	TITLE	ASSIGNMENT
Jon David	**Natural Resource Specialist**	**Project Coordinator and Minerals**

REVIEWERS	TITLE	ASSIGNMENT	DATE/INITIALS
Kent Undlin	**Wildlife Biologist**	**Wildlife/T&E**	**1/4/13 KU**
Guy Stickney	**Civil Engineer**	**Engineering**	**1/9/13 GS**
Doug Melton	**Archaeologist**	**Cultural/Paleo**	**03/15/2013 DM Cultural Report MT-020-13-72**
Dan Benoit	**Supervisory NRS**	**Reviewer**	**3/23/13 DAB**

ENVIRONMENTAL COORDINATOR 4/3/2013 **DATE**

ENVIRONMENTAL ASSESSMENT

EA NUMBER: DOI-BLM-MT-C020-2011-049-EA

PROPOSED ACTION/ TYPE: Denbury requests approval to stabilize and repair the subject well site and immediate vicinity/ Sundry Notice

LOCATION OF PROPOSED ACTION: T. 14 N., R. 55 E., SW¼ NE¼ Section 21, Dawson County, Montana

PREPARING OFFICE: Miles City Field Office

APPLICANTS: Denbury Onshore, LLC

DATE OF PREPARATION: December 14, 2012

CONFORMANCE WITH APPLICABLE LAND USE PLAN: This proposed action is in conformance with the Big Dry Resource Management Plan Record of Decision (RMP ROD) approved in 1996. On page 14 of the ROD, it states "The BLM planning process determines availability of federal lands for oil and gas leasing where BLM is the surface management agency.", and on page 13, "A lease grants the right to explore, extract, remove, and dispose of oil and gas deposits that may be found on the leased lands. The lessee may exercise the rights conveyed by the lease, subject to lease terms and any lease stipulations and permit approval requirements."

PURPOSE AND NEED OF THE PROPOSED ACTION:
The purpose of the proposed action is to correct the surface drainage and stabilize the pad slopes that have slid away on an existing water injection well located in Section 21, T14N, R55E, in Dawson County, Montana. The proposed action is needed for the continued orderly, efficient and environmentally responsible development of the Gas City Unit. This includes development of this proposal with the appropriate mitigation consistent with the goals, objectives, and decisions of the Big Dry Resource Management Plan.

PROPOSED ACTION: Denbury Onshore, LLC (Denbury) requests approval to stabilize and repair the 32X-21 water injection well site (see photo 1) and the immediate vicinity of the well site. The proposed action is to correct the surface drainage, sub-cutting and re-compacting weak areas of the pad, replacing the pad slopes that have slid away, and stabilizing the pad with a geo-grid product.

Correcting the surface drainage would include removing the existing berm that surrounds the pad and finding another method of secondary containment. The pad would be graded with a +/-1% slope to avoid any water ponding on its surface. This would help prevent water from saturating the subgrade and weakening the soil structure. The north corner of the pad would be sub-cut to a minimum depth of 5 feet and re-compacted to stabilize the soils. The soils would be re-compacted in 6 inch lifts to 95% of maximum density as determined by the American Association of State

Highway and Transportation Officials moisture density relations of soils (AASHTO T99). A layer uniaxial geo-grid would be placed for every +-3 vertical feet of fill. The sub-cut area would extend behind the fault line a minimum distance of one-and-a-half times the sub-cut depth (see Detail A in Figure 1). The sub-cut area is estimated at approximately 4,000-6,000 cubic yards.

The portion of the north pad slope that slid away would be replaced with a final slope of approximately a 5:1. The soils at the base of the main scarp would be scarified and re-compacted to provide a stable base for the fill material. The fill material would be taken from the hill on the south side of the pad as needed. These soils would be placed in 6 inch lifts and compacted to 95% of maximum density as determined by AASHTO T99. A layer of uniaxial geo-grid would be placed on every +/- 3 feet of fill. The north edge of the pad would be terraced as shown by figure 1 to help unify the existing and proposed soils. The amount of fill required to preplace the bank is estimated at 6,000 cubic yards, and approximately 6,000 cubic yards of the north edge of the pad would need to be sub-cut and re-compacted.

The layer of uniaxial geo-grid would be placed for every +/-3 feet of fill material in the areas to be sub-cut as well as in the area where the slide has occurred. The strong axis of the geo-grid would be placed perpendicular to the fault lines to help hold the soils in place. It is estimated approximately 22,000 square yards of fabric would be required. Two layers of fabric would be required in the north sub-cut area, and 5 layers of fabric would be required to replace the north pad slope. Finally, the anchors on the northeast edge of the pad would be reset and pull tested.

Photo 1.

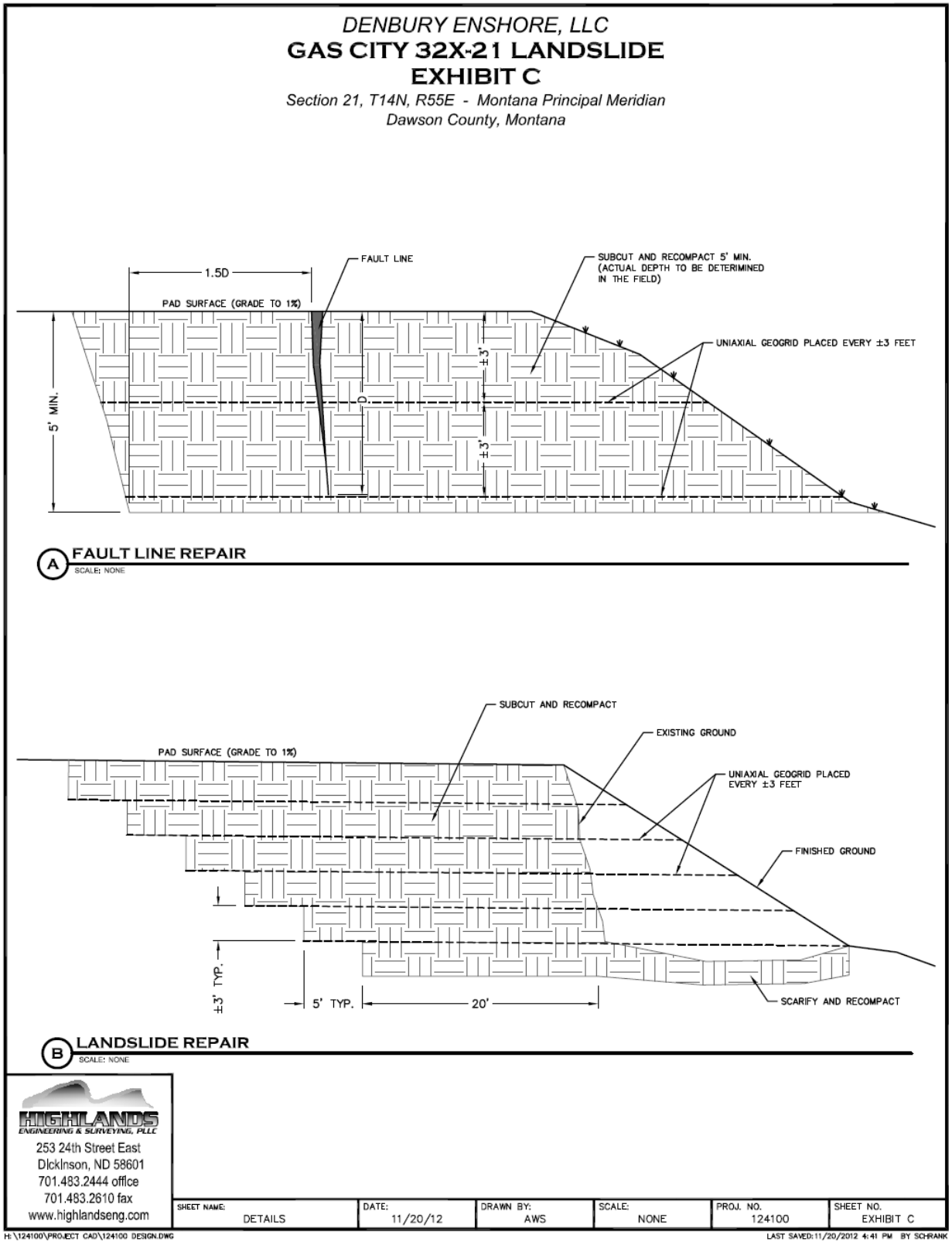
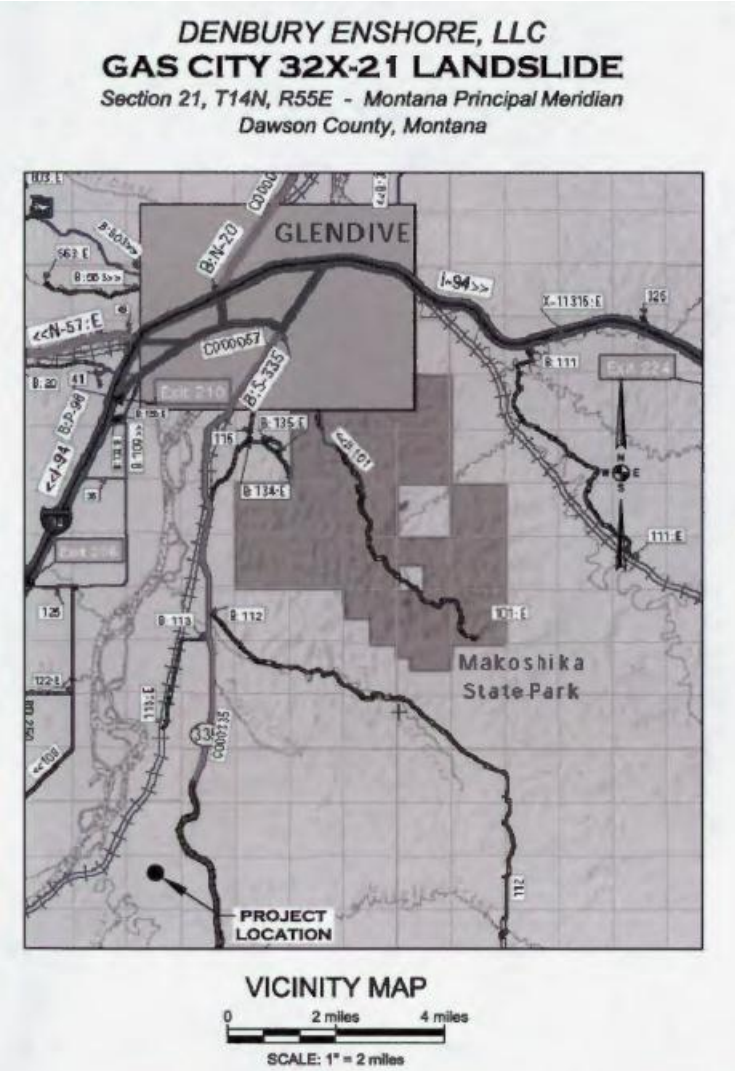


Figure 1. Gas City 32X-21 Landslide



Map 1. Vicinity Map

ALTERNATIVE 1 - NO ACTION: The BLM NEPA Handbook (H-1790-1) states that the Environmental Assessments (EAs) on externally initiated proposed actions, the No Action Alternative generally means that the proposed activity would not take place. This option is provided in 43 CFR 3162.3-1 (h) (2). This alternative would deny the approval of the proposed application, and the current land and resource uses would continue to occur in the proposed project area.

AFFECTED ENVIRONMENT:

The following critical resources have been evaluated and are not affected by the proposed action or the alternatives in this EA:

Table 1.

Mandatory Item	Potentially Impacted	No Impact	Not Present On Site
Threatened and Endangered Species			X
Floodplains			X
Wilderness Values			X
ACECs			X
Water Resources	X		
Air Quality		X	
Cultural or Historical Values			X
Prime or Unique Farmlands			X
Wild & Scenic Rivers			X
Wetland/Riparian	X		
Native American Religious Concerns		X	
Wastes, Hazardous or Solids		X	
Invasive, Nonnative Species		X	
Environmental Justice		X	

The following non-critical resources will not be impacted by this proposed action; therefore they will not be analyzed in detail by this Environmental Assessment: forestry, riparian, wilderness, recreation, wild horse/burro, fire, geology, minerals, noise, and weeds.

Air: The proposed actions are located in a Class II air quality rating area, which is an area that allows moderate degradation above "baseline" readings. The nearest Class I air shed is in the southern portion of Theodore Roosevelt National Park in Western North Dakota, which is approximately 60 miles east of the project area. The predominant wind direction in this area is from the west.

Cultural/Paleontology: The area around the slumping pad was examined for cultural and paleontological resources. No cultural resources were recorded in the inventoried area around the well pad. Fossil clams were observed on and around the pad. The clams are not considered to be scientifically significant (See BLM Cultural Resources Report MT-020-13-72). The proposed action would have no effect to cultural properties listed on or eligible for listing on the National Register of Historic Places.

Hydrology: Highlands Engineering and Surveying (Highlands) visited the site to perform a site survey and to investigate the erosion problems at the 32 X-21 well location on November 2, 2012. Based on their findings, it was determined that the large fault at the site was likely caused by a landslide. Landslides are typically caused by a combination of moisture, steep slopes, and unstable soils. Based on Highlands observations at the site, these factors all appear to have contributed to the landslide. At one time there was a berm built up around the entire pad causing the pad to hold water. Over time, this water would have infiltrated into the soils below and saturated the subgrade. This water reduced the friction in the soil and likely was a major contributing factor to the landslide

The proposed project is in the Lower Yellowstone River (4th Order HUC 10100004) watershed (see vicinity map 1). The proposed project is approximately 1.2 mile west of the Yellowstone River. The water quality of the surface runoff in this area is determined by the soil chemistry, topography and the quantity of vegetation. Protection of the soil by vegetation is an important component for the prevention of erosion and improvement of the surface water quality. Steep, open, raw slopes of the area yield sediment laden water of poor quality. Well vegetated, shallow slopes (less than ~30%) yield runoff which is of relative good quality.

Livestock Grazing: The proposed action is located within the Kenneth Netz Allotment #914515. The lease allows 451 head of cattle to utilize 1271 AUMs from June 20 through January 14.

Soils: Soils in this area have developed in residuum and alluvium derived from the Cretaceous Pierre Shale which consists of black to gray shale with thin strata of claystone, siltstone and bentonite. As a result, surface and subsurface textures are commonly clay, silty clay loam, and clay loam. The characteristics of the marine shale parent material dominate physical and chemical characteristics of the soils. Soluble salts, predominately sodium, are present in most soils of the area. Slope wash concentrates these salts in the lowest parts of the landscape, usually in or near drainages. Concentration of salts may result in a claypan area. Salts in these areas will effect vegetation populations in areas of concentration. Surface crusting on these soils further effects seedling growth. Topography is commonly gently rolling. These soils are susceptible to water erosion due to poor infiltration. Limited vegetative cover may result in wind erosion. These soil characteristics make reclamation of these soils difficult. The project area is located on an existing disturbance from the old access road. This disturbance was constructed on older alluvial terraces on floodplains and coalescing alluvial fans and is located on a combination of both deep, loamy, alluvial soils and fine textured soil conditions.

Vegetation: The majority of the proposed project area vegetation type is characterized by the Rocky Mountains Juniper/Bluebunch Wheatgrass (*Juniperus scopulorum/Agropyron scicatum)* (Hanson et. al, 2008) habitat type. The canopy of this habitat type is entirely dominated by the short Rocky Mountain juniper and Bluebuch wheatgrass. These stands are open with considerable amounts of rock and exposed mineral soil on the ground surface. There is a small presents of short shrubs in trace amounts. Undisturbed stands are characterized by widely scattered individuals of Rocky Mountain Juniper (Due to its extensive root systems, the species is an excellent soil binder) about 10 to 16 feet tall, interspersed with Bluebuch wheatgrass. The principal forage species are blue grama, western wheatgrass, and needle-and-thread. Common shrubs are silver sagebrush, Wyoming big sagebrush, broom snakeweed, plains pricklypear, rabbitbrush, Nuttall saltbush, and creeping juniper. Common forbs are phlox, wildbuckwheat, scarlet globemallow, and lambsquarter goosefoot.

Wildlife: The surrounding area provides habitat for wildlife including pronghorn, mule deer, and potentially sharp-tailed grouse. A wide variety of non-game wildlife species including migratory birds also exist in the vicinity of the proposed project. The proposed action is located within mule deer winter range. Bald eagles, a BLM sensitive species, may migrate through the area in the spring, fall, and winter time periods. No sharp-tailed grouse strutting grounds are known to exist in the vicinity of the proposed project. The project area contains no other known habitat for endangered,

threatened, or other special status species.

Visual Resource Management (VRM): The proposed project is located in a VRM Class IV area. The objective of this class is to provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. However, every attempt should be made to minimize the impact of activities through careful location, minimal disturbance and repeating the basic elements.

ENVIRONMENTAL IMPACTS:
DESCRIPTION OF IMPACTS FROM PROPOSED ACTION:

Air Quality: Emissions generated during the construction phase include vehicle emissions; diesel emissions from large construction equipment; small amount of carbon monoxide, nitrogen oxides, and fugitive dust from sources such as disturbing and moving soils, excavating, trenching, backfilling, and truck equipment traffic. There are accumulated types of pollution from activities within the surrounding and adjacent oil and gas activities, and dust particulates from associated surface-disturbing activities. Impacts on air quality would be temporary and local. The emissions and fugitive dust that would be generated would not cause an exceedance of air quality standards nor have any impact on climate change.

Cultural: The proposed action would not impact cultural resources or scientifically important paleontological resources. Unanticipated discoveries of cultural materials during construction would be dealt with through implementation of Condition of Approval No.6,

Hydrology: Since the landslide (10/9/12), it appears that there has been additional erosion occurring due to poor drainage. A bowl has been created at the base of the main scarp that is holding water. This water continues to saturate the surrounding soils and causes the adjacent bank to slough off. Furthermore, where the berm around the pad has slid away, water is now draining off of the pad over the main scarp causing additional erosion.

There are several cracks extending through the pad. These cracks indicate week areas in the soil structure, and indicate possible areas of failure in the future. They also allow water to infiltrate the pad more quickly and continue to weaken the soils. The most notable fault extends through the northern corner of the pad. There is also a dip in the pad that indicates the area may have already slid slightly. There is a power pole located in this corner of the pad that is in danger of being washed out with the pad.

Based on the issues observed by Highland Engineering's site investigation, correcting the surface drainage, sub-cutting and re-compacting weak areas of the pad, replacing the pad slopes that have slid away, and stabilizing the pad would reduce effects to water resources.

Soils: Based on the issues observed by Highland Engineering's site investigation, correcting the surface drainage, sub-cutting and re-compacting weak areas of the pad, replacing the pad slopes that have slid away, and stabilizing the pad would reduce effects to soil erosion.

Livestock Grazing: The activities would result in temporary and localized impacts to grazing, such as not being able to utilize the allotment during the brief construction period. Cattle would have to find another location to graze, but it would be short term. These activities could create a temporary disturbance in the immediate vicinity of the project area.

Vegetation: Impacts to vegetation would be minimal and localized. The introduction or spread of some nonnative invasive vegetation could occur as a result of vehicular traffic, but this would be relatively limited in extent. If noxious weeds do occur as a result of operations the operator would be required to control the noxious weeds.

Wildlife: Potential effects to wildlife in the proposed action area would include temporary displacement of wildlife species in the subject area including migratory bird species and mule deer. Although the proposed action is within mule deer winter range, the short duration of the action (up to 3 days), utilizing equipment within the existing disturbed area and present winter conditions would not affect wintering mule deer in the subject area thus timing stipulations would not be applied to the proposed short-term pad stabilization project. This decision has been made in consultation with, Montana Fish, Wildlife and Parks Energy Biologist. Overall effects to wildlife species, including migratory bird species should be minimal.

VRM: Class IV allows for major landscape modifications. Visual impacts associated with the proposed action would be consistent with management objectives.

DESCRIPTION OF IMPACTS FROM ALTERNATIVE 1 - NO ACTION:

Soils: Under this Alternative, there would be additional erosion due to poor drainage. A bowl has been created at the base of the main scarp that is holding water. This water would continue to saturate the surrounding soils and cause the adjacent bank to continue to erode. Also several cracks have formed throughout the pad. These cracks indicate week areas in the soil structure, and indicate possible areas of failure in the future. These cracks also allow water to infiltrate the pad more quickly and continue to weaken the soils.

CUMULATIVE IMPACTS

There would be continuing increased erosion, sedimentation, and overland flow from existing reclamation; flow line installation; construction; minerals extraction activities; improperly maintained culverts and low water crossings; livestock grazing; and other surface disturbing activities within the watershed.

MITIGATION MEASURES/REMARKS:

CONDITIONS OF APPROVAL:

1. Notify BLM (Minerals, 406-233-2800 and/or Jon David, 406-233-3665) at least 48 hours before beginning construction work.

2. A sufficient impervious secondary containment, such as containment dikes or containment walls shall be constructed and maintained around the well.

3. The operator shall conduct all activities associated with the construction, operation, maintenance, and termination of construction corridor within the authorized limits

4. Any variation from the approved plan must be approved in advance by this office.

5. No construction or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support construction equipment. If such equipment creates ruts in excess of 4 inches deep, the soil shall be deemed too wet to adequately support construction equipment.

6. On all disturbed areas erosion control measures must be constructed or installed as needed.

7. All disturbed areas shall be seeded after October 1 (before ground freezes) or prior to May 15 (after ground thaws) with the following mixture:

   Combination shall include at least four of the following species

Species	lbs/acre, pure live seed
Western wheatgrass*	3.0
Pascopyrum smithii, variety Rosanna	
Green needlegrass	2.0
Stipa viridula, variety Lodom	
Slender wheatgrass	2.0
Elymus trachycaulus ssp. trachycaulus, variety Pryor	
Needleandthread	1.0
Stipa comata	
Bluebunch wheatgrass	2.0
Pseudoroegneria spicata ssp. spicata, variety Goldar	
Sideoats Grama	2.0
Bouteloua curtipendula	
Little bluestem	2.0
Schizachyrium scoparium	

*Shall be included in the mix. Thickspike wheatgrass may be substituted for wheatgrass only when western wheatgrass is unavailable.

8. The operator is responsible for the suppression of any fires started as a result of operations. The contractor must have the necessary equipment, including fire extinguishers or water, to provide initial suppression of fire.

9. The operator is responsible for informing all persons in the area who are associated with this project that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are uncovered during construction, the operator is immediately to stop work that might further disturb such materials, and contact the authorized officer (AO). Within five working days, the AO will inform the operator as to:

    a) whether the materials appear eligible for the National Register of Historic Places;
    b) the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary); and,
    c) a timeframe for the AO to complete an expedited review under 35 CFR 800.11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

    If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation costs. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

10. On BLM lands, the operator shall be responsible for control of noxious weeds occurring as a result of operations. The BLM shall be responsible for approval of the weed control plan.

You have the right to request a State Director Review (SDR) of this decision pursuant to 43 CFR 3165.3(b). An SDR request, including all supporting documentation, must be filed with the Montana State Office, State Director (MT-920) at 5001 Southgate Drive, Billings, Montana 59101-4669 within 20 business days of your receipt of this decision. If you are adversely affected by the State Director's decision, it can be further appealed to the Interior Board of Land Appeals (IBLA) in Washington D.C. pursuant to 43 CFR 3165.4, 43 CFR 4.411, and 43 CFR 4.413. Should you fail to timely request an SDR, or after receiving the State Director's decision, fail to timely file an appeal with the IBLA, no further administrative review of this decision will be possible.

CONSULTATION/COORDINATION:

Jeff Varner – Denbury Onshore, LLC
Andrew Schrank and KC Homiston – Highlands Engineering & Surveying, PLLC

LIST OF PREPARERS:

Jon David, Natural Resource Specialist
Doug Melton, Archaeologist
Kent Undlin, Wildlife Biologist
Guy Stickney, Civil Engineer

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MILES CITY FIELD OFFICE
FINDING OF NO SIGNIFICANT IMPACT

Denbury Onshore, LLC MTBIL041098
DOI-BLM-MT-C020-2013-049-EA

BACKGROUND

The Bureau of Land Management (BLM) has conducted an environmental analysis (EA No. MT-020-2013-049) to assess the proposed action to stabilize and repair the subject well site and immediate vicinity in Dawson County, Montana. Impact identification and analysis of the project proposal and alternatives has been completed. The proposed actions would be located on BLM surface. A no action alternative and proposed action alternative were analyzed in the EA.

FINDING OF NO SIGNIFICANT IMPACT

On the basis of the information contained in the EA (DOI-BLM-MT-C020-2013-049-EA), and all other information available to me, it is my determination that:

(1) The implementation of the Proposed Action or alternatives will not have significant environmental impacts beyond those already addressed in the Big Dry Resource Management Plan.

(2) The Proposed Action is in conformance with the Record of Decision for the Big Dry Resource Management Plan; and

(3) The Proposed Action does not constitute a major federal action having a significant effect on the human environment.

Therefore, an environmental impact statement or a supplement to the existing environmental impact statement is not necessary and will not be prepared.

This finding is based on my consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), both with regard to the context and to the intensity of the impacts described in the EA.

Context

The proposed action to stabilize and repair the subject well site and immediate vicinity in Dawson County, Montana.

Intensity

The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and incorporated into resources and issues considered (includes supplemental authorities Appendix 1 H-1790-1) and supplemental Instruction Memorandum, Acts, regulations and Executive

Orders. The following have been considered in evaluating intensity for this proposal:

1. Impacts that may be both beneficial and adverse. The proposed project would impact resources as described in the EA. In addition to mitigation measures included in the project design, BLM developed additional mitigation measures to further minimize or eliminate adverse impacts to other resources and land uses. These additional mitigation measures are identified in the proposed action and are attached to this document as conditions of approval. The EA also disclosed beneficial impact from the proposed project to Encore for a reliable power source for the oil well, improved access, and potentially a productive oil well. None of the environmental effects discussed in detail in the EA are considered significant, nor do the effects exceed those described in the Big Dry Resource Area Management Plan.

2. The degree to which the proposed action affects public health and safety. No aspect of the proposed action would have an effect on public health and safety.

3. Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. No historic and cultural resources, parks, prime farmlands, or wild and scenic rivers were found in the area

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. No unique or appreciable scientific controversy has been identified regarding the effects of the Proposed Action.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The analysis has not shown that there would be any unique or unknown risks to the human environment.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. This project neither establishes a precedent nor represents a decision in principle about future actions. The proposed action is consistent with actions appropriate for the area as designated by the Big Dry RMP.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. The environmental analysis did not reveal any cumulative effects beyond those already analyzed in the EIS which accompanied the Big Dry RMP.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources. The proposed action will not adversely affect any district, site, highway, structure, or object listed or eligible for listing in the National Register of Historic Places or cause loss or destruction of significant scientific, cultural, or historic resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. There are no threatened or endangered species or habitat in the area of the proposed action. There are no threatened or endangered plant species or habitat in the area.

10. Whether the action threatens a violation of Federal, State, Tribal or Local law or requirements imposed for the protection of the environment. The proposed action does not threaten to violate any Federal, State, Tribal, or local law. Furthermore, the project is consistent with applicable land management plans, policies, and programs.

4/17/2013

Todd Yeager
Field Manager
Miles City Field Office

Date

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MILES CITY FIELD OFFICE
DECISION RECORD

Encore Operating, Co. MTBIL041865B
DOI-BLM-MT-C020-2013-049-EA

DECISION

It is my decision to select the Proposed Action Alternative as described in this EA to stabilize and repair the subject well site and immediate vicinity. The EA and the FONSI analyzed the selected alternative and found no significant impacts. Implementation of this decision will result in repair of the subject well site and immediate vicinity. The selected alternative is in conformance with the Big Dry Resource Management Plan, as amended.

ALTERNATIVES

In addition to the selected alternative, the EA considered the "No Action" alternative.

RATIONALE FOR SELECTION

The purpose of the action is to allow Denbury Onshore, LLC (Denbury) to stabilize and repair the 32X-21 water injection well site and the immediate vicinity of the well site. The proposed action is to correct the surface drainage, subcutting and recompacting weak areas of the pad, replacing the pad slopes that have slid away, and stabilizing the pad with a geogrid product.

CONSULTATION AND COORDINATION

The following BLM specialists were consulted: Guy Stickney, Civil Engineer; Doug Melton, Archaeologist; Kent Undlin, and Wildlife Biologist. The following Denbury specialists were consulted: Jeff Varner – Denbury Onshore, LLC. The engineer that developed the plan was Andrew Schrank and KC Homiston from Highlands Engineering & Surveying, PLLC

COMPLIANCE AND MONITORING

BLM will conduct compliance and monitoring inspections during the construction procedures. Inspections will be conducted to determine whether or not operations are being conducted in compliance with the described proposal. Monitoring inspections will be conducted to determine the effectiveness of mitigation measures, results of reclamation work, and impacts to other resources. Based upon the results of inspections, BLM could impose requirements to modify operations to minimize or eliminate adverse impacts to other resources.

Terms / Conditions / Stipulations: The following mitigation measures were analyzed in the EA and are included as Conditions of Approval.

4/17/2013

Todd Yeager
Field Manager
Miles City Field Office

Date