

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

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EMS TRANSMISSION 09/30/2005
Instruction Memorandum No. 2005-247
Expires: 09/30/2006

To: All Field Officials
From: Director
Subject: National Environmental Policy Act (NEPA) Compliance for Oil, Gas, and Geothermal Development

Program Areas: Oil, Gas, and Geothermal Exploration and Operations; Lands and Realty (energy-related rights-of-way); Environmental Coordination.

Purpose: This Instruction Memorandum (IM) provides guidance for improved NEPA compliance in oil, gas, and geothermal exploration and development operations on public lands. It specifically provides instructions for developing a range of reasonable alternatives in environmental impact statements (EIS) for oil, gas, and geothermal development projects; interim guidance on the application and use of statutory NEPA categorical exclusions (CX), as granted in Section 390 of the Energy Policy Act of 2005, for oil and gas exploration and development; expanded use of multiple well environmental assessments (EA) and EISs; expanded use of the Documentation of NEPA Adequacy (DNA); and consideration and application of Best Management Practices (BMP).

Background: Section 390 of the Energy Policy Act of 2005 (the "Act") established five new statutory NEPA CXs. These exclusions are different in several respects from those historically used by the Bureau.

Additionally, the increasing number of approved and anticipated oil, gas, and geothermal projects on public lands, and the increase in the number, complexity, and controversy of EISs and other NEPA analyses associated with exploration and development of oil, gas, and geothermal resources, has prompted the need for additional national guidance.

Policy/Action: Field Offices are directed to incorporate the following NEPA procedures when analyzing and reviewing oil, gas, geothermal, and energy-related projects. This interim policy is in effect until Departmental Manuals, BLM Manuals, and/or BLM Handbooks are revised or additional guidance is issued.

Range of Alternatives

Departmental Manuals, guidance from the Council on Environmental Quality (CEQ), and BLM Handbooks contain guidance for developing a range of reasonable alternatives in NEPA documents. Additional guidance for developing a range of reasonable alternatives for oil, gas, and geothermal development EISs is contained in Attachment 1. The attached guidance applies to all EISs that have not as yet progressed beyond publication of a draft document, and strong consideration should be given to those documents in the final preparation stages (final EIS), but have not been approved for publication. Environmental Assessments are not addressed by the policy contained within Attachment 1.

Section 390 Categorical Exclusions (CX)

Section 390 of the Energy Policy Act of 2005 established five new statutory CXs that apply only to oil and gas exploration and development (the CXs do not apply to geothermal actions). These CXs are different in application from the CXs previously used by the BLM, and are further described in Attachment 2.

Until further guidance is issued, the guidance in Attachment 2 is to be carefully followed to assure accurate and consistent application of the new CXs.

Field Offices shall maintain a structured, multi- or interdisciplinary permit review and approval process, conduct onsite exams for 100 percent of proposed well and road locations, and shall apply appropriate mitigation and BMPs to all permitted actions, in accordance with existing land use plans, full field development EIS, and other pertinent NEPA documents, even when actions are approved through the use of Section 390 CXs.

Multiple Well EA/EIS

An EA or EIS prepared for development of two or more oil, gas, or geothermal wells provides substantial time savings over writing individual EAs or EISs for each well approval and generally results in improved impact analysis.

Effective immediately, all BLM Offices will address multiple proposed activities (e.g. multiple wells within a field) through a single NEPA action, whenever practical (Attachment 3 provides specific guidance).

Documentation of NEPA Adequacy (DNA)

The appropriate use of DNAs for oil, gas and geothermal operations is to be expanded in all Field Offices (Attachment 4 and WO IM 2001-162 provide detailed guidance).

Tracking

The use of Section 390 CXs is to be tracked and tabulated for Fiscal Year 2006 on the table in Attachment 5. If any Section 390 CXs were approved during Fiscal Year 2005, add them into the Fiscal Year 2006 table. Maintain the table in each Field Office as a reference for addressing future CX data calls.

Timeframe: Implement immediately.

Budget Impact: Full implementation of these policies is expected to provide substantial savings in staff time and budget associated with approval of APDs and related realty actions.

Manual/Handbook Sections Affected: NEPA Handbook H-1790-1.

Coordination: Coordination occurred among the Washington Office Fluid Minerals Group; Planning, Assessment and Community Support Group; Land and Realty Group; and Office of the Solicitor – Department of the Interior.

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Signed by:
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5 Attachments

- 1 – Developing a Range of Reasonable Alternatives in Oil, Gas, and Geothermal Exploration and Development Environmental Impact Statements (EIS) (3 pp)
- 2 – Use of Section 390 Categorical Exclusions for Oil and Gas Development (5 pp)
- 3 – Use of Multiple Well Environmental Assessments (EA) or Environmental Impact Statements (EIS) for Oil and Gas Development (1 p)
- 4 – Use of Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy (DNA) (1 p)
- 5 – Section 390 Categorical Exclusion Tracking Log (1 p)

**Developing a Range of Reasonable Alternatives
in Oil, Gas, and Geothermal
Development Environmental Impact Statements (EIS)**

Introduction

Environmental Impact Statements (EISs) for oil, gas, and geothermal development must evaluate and analyze a range of reasonable alternatives that provide the decision maker and the public with alternative means of meeting the purpose and need for the action, including alternative forms of mitigation for a “clear choice of options.” The guidance that follows pertains to post-leasing National Environmental Policy Act (NEPA) analysis and not to land use plan revisions or amendments.

Section 102(2)(3) of NEPA requires agencies to consider “appropriate alternatives” to the proposed action and describe their environmental consequences. The Council on Environmental Quality (CEQ) regulations at 40 CFR 1502.14(a) require that agencies rigorously explore and objectively evaluate all reasonable alternatives and, for alternatives eliminated from detailed study, briefly explain the reasons for elimination.

The courts have clarified that the agency’s obligation is to analyze an appropriate range of alternatives, not “every alternative.” Headwaters, Inc. v. Bureau of Land Management, 914 F.2d 1174, 1180-81 (9th Cir. 1990). The NEPA “requires an agency to set forth only those alternatives necessary to permit a reasoned choice.” Hells Canyon Alliance v. U.S. Forest Service, 227 F.3d 1170, 1181 (9th Cir. 2000).

The alternatives that must be analyzed are those (1) which meet the purpose and need for the proposed action; (2) which reduce the adverse environmental effects of the proposed action; (3) which are feasible; (4) whose effects can be analyzed; and (5) which are not substantially similar in effects to an alternative that is analyzed.

Role of the Purpose and Need in Defining the Range of Alternatives

You must have a well-defined purpose and need. The Purpose and Need statement describes the BLM’s purpose of and need for action. The background section for the Purpose and Need statement should take into account the needs and goals of the parties involved in the application and the function that the agency plays in the decisional process, i.e. that after the lease is issued, the agency has already decided that oil and gas development in general is acceptable, but now must decide whether to approve the means of doing so at a particular location proposed by the applicant. The Purpose and Need cannot be so “unreasonably” narrow as to eliminate otherwise reasonable alternatives from consideration. To the extent possible, the Purpose and Need section should tie to existing decisions, policy, regulation, or law.

The Purpose and Need section of an oil, gas or geothermal NEPA analysis should include the BLM's energy goals; a description of the actions proposed in the lessee's applications; and conformity with the goals, objectives, and decisions of the applicable land use plan for the project areas.

For example, in abbreviated form the Purpose and Need might read, "The purpose and need of this full field development is to determine whether to permit environmentally responsible exploration and development of the oil and gas resource within the project area, consistent with the existing leases to continue to meet the nation's energy needs. This includes development of appropriate mitigation consistent with the goals, objectives, and decisions of the *(name)* RMP and applicable policies, regulations, and laws. The exploration and future development of the oil and gas resources will help supply our future domestic energy needs and play an integral part in our nation's energy security.

A range of reasonable alternatives must be developed based on the purpose and need for the action.

Recommended Oil, Gas, and Geothermal Alternatives

It is generally appropriate for EISs addressing oil, gas, and geothermal development to consider the following alternatives:

- No Action Alternative: This alternative is based on denial of the proposed action and generally assumes that no new drilling would occur in the project area on Federal mineral estate beyond what is currently permitted and/or actions analyzed and approved through previous NEPA decision documents (e.g. previous field development document). The No Action Alternative must be analyzed, regardless of conformance with the purpose and need, or its feasibility. This is a mandatory requirement under CEQ regulations, and necessary to provide a clear choice of management options for the decision maker.

Note for example, a new proposed action for 40 acre spacing is now under review. The No Action alternative analysis would be based on denial of the proposed 40 acre spacing. However, the alternative must consider the impacts of development of any previously authorized oil and gas development not part of the proposed action (i.e., 160 acre spacing), even if that level of development is not yet completed (by referencing the previously completed NEPA document).

- Proponent's proposed action as modified by any statutory requirements (such as endangered species protection).
- Proponent's proposed action with BLM recommended mitigation (including the Best Management Practices (BMP) described in WO-IM-2004-194). If the proposed action adequately mitigates identified impacts and includes BMPs, a specific BLM recommended mitigation alternative is not necessary.
- Other reasonable alternatives that address identified impacts, such as development with additional mitigation (such as alternative well locations, alternative access routes, additional timing or spacing constraints; offsite mitigation, different methods for treating produced water, horizontal well drilling, or other technologies).
- In addition, based on the new statutory CXs, alternatives that analyze the impacts of higher well density and development levels beyond what is proposed should be considered. Including such analysis will facilitate the use of the statutory CXs in the future should development require well densities greater than what is currently proposed.

The BLM shall examine reasonable alternatives that would reduce impacts, even if implementation would require amendment of the applicable land use plan. The BMPs, such as those found at www.blm.gov/bmp, should be considered in the development of the alternatives and mitigation. The BLM offices are strongly encouraged to look outside their administrative boundaries and consider what is being applied in similar operations at other locations across the nation. Field Offices and operators are continually developing and applying new techniques and technologies to reduce impacts and costs. Many mitigation techniques successfully used in one BLM office may be directly applicable to another locale. Basic oil, gas, and geothermal drilling and production requirements are surprisingly similar throughout the industry and there is little rationale for not considering successful mitigation strategies and alternatives developed in other offices and regions.

Use of Section 390 Categorical Exclusions for Oil and Gas Development

Section 390 of the Energy Policy Act of 2005 (the “Act”) establishes statutory categorical exclusions (CX) under the National Environmental Policy Act (NEPA) that apply to five categories of oil and gas exploration and development on Federal oil and gas leases. Section 390 does not apply to geothermal leases. This section of the Act took effect on the date of enactment, August 8, 2005.

The use of the new statutory CXs is not dependent on the Council for Environmental Quality (CEQ) process for approving new CXs. Additionally, the CXs established by Section 390 are not subject to the requirement in 40 CFR 1507.3 that would preclude their use when there are extraordinary circumstances. This is because the CXs addressed in this guidance are established by statute and not under the CEQ procedures pursuant to 40 CFR 1507.3 and 1508.4.

This guidance provides direction to the Field and State Offices on the immediate implementation of this new authority. This is interim guidance and may be modified when BLM promulgates a revision to Onshore Oil and Gas Order No. 1.

The law prescribes that for five categories of oil and gas operations, applicability of the Section 390 categorical exclusions is presumed, but subject to rebuttal. The five categories are:

1. *Individual surface disturbances of less than five (5) acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to NEPA has been previously completed.*
2. *Drilling an oil and gas location or well pad at a site at which drilling has occurred within five (5) years prior to the date of spudding the well.*
3. *Drilling an oil or gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as a reasonably foreseeable activity, so long as such plan or document was approved within five (5) years prior to the date of spudding the well.*
4. *Placement of a pipeline in an approved right-of-way corridor, so long as the corridor was approved within five (5) years prior to the date of placement of the pipeline.*
5. *Maintenance of a minor activity, other than any construction or major renovation o(f) a building or facility.*

In reviewing an Application for Permit to Drill (APD), Surface Use Plan of Operations, or pipeline application involving a proposed activity that fits into one of the above-described five categories, the appropriate CX is to be applied, and it may be presumed that no further NEPA analysis is required. Specifically, if one or more of five statutorily-created CXs applies to a proposed activity, Field Officials are not to use the existing CX review process or apply the extraordinary circumstances in 516 Departmental Manual. The Authorized Officer should apply the CX unless the activity does not meet the standard prescribed in the law to qualify for the exclusion. The Authorized Officer must include a brief narrative in the well file stating the rationale for making the determination that the categorical exclusion applies. If more than one CX is applicable, the rationale for the determination for each CX needs to be included in the well file. Field Offices are advised not to prepare a NEPA document in lieu of appropriately applying the statutory CXs. Environmental Best Management Practices (BMP) and other suitable mitigation are to be applied to permit approvals in accordance

with current national policy. The application of site-specific measures does not require additional NEPA documentation.

Nothing in the Act or these instructions precludes the use of the Documentation of NEPA Adequacy (DNA) process, where appropriate. Moreover, when a DNA can be justified based on existing NEPA documents (i.e., EA or EIS), it may be employed even if the document is not as recent or the disturbance so minor as to qualify for one of these CXs.

Specific instruction for each new CX is stated below:

1. The first categorical exclusion in the Act applies to: *“(1) Individual surface disturbances of less than five (5) acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to NEPA has been previously completed.”*

This requires the Authorized Officer to do three things before applying this exclusion to any authorization. First, the Authorized Officer must determine that the action under consideration will disturb less than five acres on the site. If more than one action is proposed for a lease (e.g., two or more wells), each activity is counted separately and each may disturb up to five acres. Similarly, the five-acre limit should be applied separately to each action requiring discrete BLM action, such as each APD, even though for processing efficiency purposes the operator submits for BLM review a large Plan of Development (POD) addressing many wells.

Second, the Authorized Officer must determine that the current unreclaimed surface disturbance readily visible on the entire leasehold is not greater than 150 acres, including the proposed action. This would include disturbance from previous rights-of-way issued in support of lease development. If one or more Federal leases are committed to a BLM approved unit or communitization agreement, the 150 acre threshold applies separately to each lease. For larger leases, the requirement for adequate documentation would be satisfied with a copy of the most recent aerial photograph in the file with an explanation of recent disturbance that may not be shown on the aerial photos. Maps, tally sheets, or other visuals may be substituted for aerial photographs.

Finally, this categorical exclusion includes the requirement of a site-specific NEPA document. For the purposes of this categorical exclusion, a site-specific NEPA analysis can be either an exploration and/or development EA/EIS, an EA/EIS for a specific POD, a multi-well EA/EIS, or an individual permit approval EA/EIS. The NEPA document must have analyzed the exploration and/or development of oil and gas (not just leasing) and the action/activity being considered must be within the general boundaries of the area analyzed in the EA or EIS. The NEPA document need not have addressed the specific permit or application being considered.

This CX may also be applied to geophysical exploration activities provided the above requirements have been met. For example, if an oil and gas exploration and development EIS analyzes the site-specific impacts of 3D geophysical exploration within the oil and gas field, this CX may apply to subsequent 3D geophysical activities conducted within the field.

The above requirements, that is, the five acre threshold, 150 acre unreclaimed disturbance limit, and a site-specific NEPA document that addressed oil and gas development are the only applicable factors for review pursuant to this statute, but all must be satisfied in order to use this CX.

2. The second exclusion applies to *“Drilling an oil and gas location or well pad at a site at which drilling has occurred within five (5) years prior to the date of spudding the well.”*

The well file narrative to support use of this CX must state the date when the previous well was completed or the date the site had workover operations involving a drilling rig of any type or capability; this also includes completion of any plugging operations. A “location or well pad” is defined as a previously disturbed or constructed well pad used in support of drilling a well. “Drilling” in the context of, “Drilling has occurred within five (5) years” refers to any drilled well including injection, water source, or any other service well. Additional disturbance or expansion of the existing well pad is not restricted as long as it is tied to the original location or well pad. This exclusion does not extend to new well sites merely in the general vicinity of the original location or well pad.

If the operator delays in spudding the new well and the time period between the previous well completion and spudding exceed 5 years, the operator must suspend preparation for drilling operations until the BLM completes NEPA compliance for the proposed well and issues a new decision on the APD. Therefore, the APD must contain a condition of approval (COA) stating that “If the well has not been spudded by (the date the CX is no longer applicable), this APD will expire and the operator is to cease all operations related to preparing to drill the well.”

The above requirements, that is, the drilling of a well at an existing location or well pad and the five year limitation are the only two applicable factors for review pursuant to this statute, but must both be satisfied in order to use this CX.

3. The third exclusion applies to *“Drilling an oil or gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as a reasonably foreseeable activity, so long as such plan or document was approved within five (5) years prior to the date of spudding the well.”*

This may become one of the most commonly used CX established by the Act. The proposed well must be within a developed oil and gas field. A developed field is any field in which a “confirmation well” has been completed. Normally, this is after the third well in a field. The pending APD must also be within the reasonably foreseeable development scenario (RFD) used in either a land use plan EIS or subsequent developmental EA or EIS. Finally, the new well must be spudded within 5 years of that previous NEPA document. This provision applies to “any environmental document” that analyzed drilling, meaning any document adopted by any Federal agency pursuant to NEPA, regardless of whether it was adopted by the BLM. Because the 5-year period is again tied to the spudding of the pending well, the APD must contain a COA that if no well is spudded by the date the CX is no longer applicable, the APD will expire, thus requiring the operator to obtain a new APD. For example, “If the well has not been spudded by (the date the categorical exclusion is no longer applicable), this APD will expire and the operator is to cease all operations related to preparing to drill the well.”

Full field development EISs do not need to be prepared where the development envisioned was analyzed in the land use plan EIS. As long as the development foreseen does not exceed the number of wells and/or surface disturbance analyzed in the prior NEPA document, no additional NEPA documentation is required because of changes in the density of development.

All of the following requirements must be met to use this CX:

- 1) The proposed APD is within a developed oil or gas field. A developed field is defined as any field in which a confirmation well has been completed.

- 2) There is an existing NEPA document (including that supporting a land use plan) that contains a reasonably foreseeable development scenario broad enough to encompass this action.
- 3) The NEPA document was finalized or supplemented within five years of spudding the well.

4. The fourth exclusion applies to: *“Placement of a pipeline in an approved right-of-way corridor, so long as the corridor was approved within five (5) years prior to the date of placement of the pipeline.”*

The 5-year time period is to be calculated from the most recent date that a decision (NEPA or permit authorization) was approved to allow use of the corridor. This means that more recent amendments to the corridor may have reset the time period clock. The time period extends to the date placement of any portion of the new pipeline is concluded, provided that placement activities began within the 5-year period. If the operator delays in beginning to place the pipeline, and the time period between the approval of the corridor and placement exceeds five years, the authorized officer must suspend the right-of-way authorization until the BLM completes NEPA compliance for the proposed right-of-way and issues a decision. To avoid problems, the right-of-way must contain a term or condition that provides for the suspension of the authorization if placement does not begin before the last date that the CX is available, thus requiring the operator to obtain a new right-of-way.

Existing right-of-way corridors of any type can be used for new pipeline placement, such as the burial of a pipeline or pipeline conduit in an existing roadbed or along a power line right-of-way, could qualify for the exclusion. The term “right-of-way corridor” in Section 390 is not limited to those authorized under 43 CFR 2800, but is a more generalized term that applies to any type of corridor or right-of-way (whether on or off lease) approved under any authority or vehicle of the BLM, including Sundry Notices. Additional disturbance or width needed to properly or safely install the new pipeline may be authorized under this exclusion if it is within the approved right-of-way corridor. Creation of a new right-of-way completely outside and not overlapping into a portion of the existing corridor is not authorized.

The above requirements, that is, the placement of a pipeline in an existing corridor of any type and placement of the pipe within five years of approval (or amendment) are the only two applicable factors for review pursuant to this statute and must both be satisfied to use this CX.

Other types of new right-of-way applications cannot be excluded from NEPA analysis under this exclusion, for example, above ground power lines, or new roads; however, existing right-of-way corridors, such as roads, may be used for new pipeline or pipeline conduit in an existing roadbed.

5. The fifth exclusion applies to *“Maintenance of a minor activity, other than any construction or major renovation of a building or facility.”*

This CX applies to maintenance of minor activities, such as maintenance of the well or wellbore, a road, wellpad, or production facility. The exclusion does not cover construction or major renovation of a building or facility. The addition of a compressor or a gas processing plant would therefore not be eligible for this CX.

Please Note: The CX (1) and (3) reference previous NEPA documents. Field Offices must apply the same or better mitigating measures considered in the parent NEPA documents to all actions approved under any CX. Additionally, BMPs are to be applied as necessary to reduce impacts to any authorization issued, regardless of the NEPA analysis or exclusion used.

Use of Multiple Well Environmental Assessments (EA) and Environmental Impact Statements (EIS) for Oil, Gas, and Geothermal Development

The following policy and procedure primarily applies to oil and gas development, but may also be applied in part to geothermal operations with multiple wells.

Rather than completing repetitive EAs for each Application for Permit to Drill (APD), substantial time savings and improved impact analysis can be obtained through a single NEPA analysis that addresses a Plan of Development (POD) or multiple-wells. This technique allows a single document to meet the NEPA requirements for multiple actions.

Some developmental EAs/EISs incorporate a highly effective method of projecting potential well and road locations on a map based on State spacing requirements, topography, subsurface geology, and lease stipulation constraints as part of the proposed action. With this technique, a map of the development area is produced where projected/possible well locations and access roads are clearly identified. Often, the final locations are drilled close to the projected locations. This technique allows for a more site-specific analysis of impacts in the EA/EIS. All Field Offices should consider this method of location projection when analyzing the impacts of oil, gas and geothermal development.

Proposed actions subsequent to the initial action for which the NEPA analysis is prepared may be considered for approval through the use of appropriate statutory CXs (see Attachment 2), or are reviewed using the Documentation of NEPA Adequacy (DNA) form, when statutory CXs do not apply, to ensure the proposed activity has been appropriately analyzed (see Attachment 4).

Effective immediately, all BLM Offices will address multiple proposed activities (e.g. multiple wells within a field) through a single NEPA action, whenever practical.

There are several ways to apply this policy so that it will not delay the operators who choose not to submit APDs or related rights-of-way in a logical grouping such as a POD. One option is to complete an analysis as an “umbrella” EA/EIS that analyzes “x” number of wells that will potentially be submitted over the next few years within an oil or gas field. The EA/EIS could set a time and number limit for future APDs.

Another option is to select a discrete geographic area and conduct the analysis specific to that area, estimating an anticipated (but not yet submitted) number of APDs. In these cases, additional NEPA documentation for current or future APDs and related rights-of-way within the scope of the EA/EIS analysis should rarely be necessary.

These multiple-well or POD EAs/EISs facilitate improved analysis of cumulative impacts. It is also easier to compare the impact reduction from best management practices when applied over a larger area for multiple wells. The NEPA analysis should examine at least one alternative that incorporates the applicable BMPs as described in WO-IM-2004-194, Integration of Best Management Practices into APD Approvals and Associated Rights-of-Way.

**Use of Documentation of Land Use Plan Conformance
and National Environmental Policy Act (NEPA) Adequacy (DNA)**

The use of DNAs is an effective tool in NEPA compliance in oil, gas, and geothermal development. The ability to use the DNA process is dependent on the type and adequacy of existing NEPA documents, because it is a process that documents the existence of *adequate* NEPA analysis.

When the new categorical exclusions (CX) do not apply, Field Offices are to next consider the DNA process, as described in WO IM 2001-062 – Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy, in permitting oil, gas, and geothermal operations for qualifying actions

Attachment 5
 Section 390 Categorical Exclusion Tracking

FY2006

State	Field Office	< 5 Acres	Same Pad	RFD/ Developed Field	Pipeline Corridor	Maintenance	Total
AK	Anchorage						
CA	Bakersfield						
CO	Cañon City						
	Craig/Kremmling						
	Durango						
	Grand Junction						
	Meeker						
ES	Jackson						
	Milwaukee						
	Eastern States						
MT	Dickinson						
	Great Falls						
	Miles City						
NV	Reno						
NM	Carlsbad						
	Farmington						
	Hobbs						
	Rio Puerco						
	Roswell						
	Tulsa						
UT	Moab/Price						
	Salt Lake						
	Vernal						
WY	Buffalo						
	Casper						
	Rock Springs						
	Kemmerer						
	Lander						
	Newcastle						
	Pinedale						
	Rawlins						
	Worland/Cody						
	Nationwide						