UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Farmington District
Farmington Field Office
6251 N College Blvd., Ste. A
Farmington, NM 87402

DECISION RECORD

for the

Howell A #3B

(ATS-F010-14-256)

NEPA No. DOI-BLM-NM-F010-2014-0220

I. Decision

I have decided to select the **Proposed Action** for implementation as described in the **Howell A 3B Natural Gas Well Project EA**. Based on my review of the Environmental Assessment (EA) and project record, I have concluded that the **Proposed Action** was analyzed in sufficient detail to allow me to make an informed decision. I have selected this alternative because the proposed **projects would allow Burlington Resources O&G Co. access to their proposed drilling site in order to directionally drill for oil and gas within their valid existing leases.**

II. Conformance and Compliance

The proposed action is in conformance with the 2003 BLM-FFO Resource Management Plan (RMP). Pursuant to 40 CFR 1508.28 and 1502.21, this site-specific Environmental Assessment (EA) tiers into and incorporates by reference the information and analysis contained in the BLM-FFO Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS) (BLM 2003a). The RMP was approved by the September 29, 2003 Record of Decision (ROD) (BLM 2003b), and updated in December 2003.

It is the policy of the BLM to make mineral resources available for disposal and to encourage development of mineral resources to meet national, regional, and local needs, consistent with national objectives of an adequate supply of minerals at reasonable market prices. At the same time, the BLM strives to ensure that mineral development is carried out in a manner that minimizes environmental damage and provides for the rehabilitation of affected lands. (BLM 2003b, 2-2 – 2-3)

III. Finding of No Significant Impact

I have reviewed the direct, indirect and cumulative effects of the proposed activities documented in the EA for the **Howell A #3B**. I have also reviewed the project record for this analysis. The effects of the proposed action and alternatives are disclosed in the Alternatives and Environmental Consequences sections of the EA. I have determined that **construction of a well pad, pipeline tie and access road to allow Burlington Resources O&G Co. reasonable access to the mineral lease in order to develop the existing lease** as described in the EA will not significantly affect the quality of the human environment. Accordingly, I have determined that the preparation of an Environmental Impact Statement is not necessary.

IV. Other Alternatives Considered

Alternatives to the proposed action are developed to explore different ways to accomplish the purpose and need while responding to potentially controversial issues related to the proposed action. Alternatives to the proposed action were considered. No other reasonable alternatives to the proposed action were apparent during or after the on-site of the Howell A 3B project.

Vertical and directional drilling alternatives were investigated within the dedicated spacing unit for the well. The proposed Howell A 3B is a Blanco Mesaverde natural gas well. The proposed action is a directional well located adjacent to an existing access road. Drilling vertically to the targeted bottom hole is not preferred due to the rough topography and limited infrastructure within the canyon where the bottom hole is located. Developing a well pad and access road in the canyon would require considerable excavation and filling to create level surfaces, and therefore, greater surface disturbance than the proposed action. In addition, the access road and pipeline would be considerably longer than for the proposed action, likely longer than 1,500 feet. Other new surface locations in the vicinity were evaluated, but ruled out due to archaeological resources.

Twinning existing well locations in the area was also considered. Three co-located wells are north of the proposed well and two co-located wells are south of the proposed well. The most recent wells drilled at each of the co-locations are Fruitland Coal wells which are shallower than the other earlier drilled Mesa-verde and Dakota formation wells on those locations. Each of the coal wells have been cavitated which makes it impractical to drill a well to a deeper location in the vicinity of the cavitated wells. Drilling through the cavitated areas could damage the producing zone of the existing well and it is possible that drilling fluids and casing cement could be lost in the cavitation zone. In order to avoid impacts to the existing wells and to ensure successful completion of the proposed well, twinning or co-locating the existing wells was ruled out.

The proposed well location was chosen in order to avoid archaeological resources and existing production zones, while reducing the amount of new long term surface disturbance. No other alternatives were identified that would create less disturbance to the human environment while facilitating an appropriate location suitable to reach the targeted formation and drilling window.

V. Rationale for the Decision

The Proposed Action is in conformance with the September 2003 Farmington Resource Management Plan (RMP) with Record of Decision (ROD), as updated in December 2003 (BLM 2003b). The proposed action is located in an area identified in the ROD as open to oil and gas leasing and development (BLM 2003b, p. 3). It is the policy of the BLM to make mineral resources available for disposal and to encourage development of mineral resources to meet national, regional, and local needs, while at the same time minimizing environmental damage and providing for the rehabilitation of affected lands (BLM 2003c, p. 2-2).

The proposed action area is located within the Rattlesnake Canyon Wildlife Specially Designated Area (SDA). The 2003 RMP management goal for the Rattlesnake Canyon SDA is “to support increases in potential wildlife” (BLM 2003c, p. C-171). The RMP allows for oil and gas development in the SDA with management prescriptions as mitigating measures. Management prescriptions mandated for this SDA applicable to the proposed action are as follows:

- For new and current oil and gas leases, seasonal timing limitation on drilling and construction from 12/1 through 3/31.

- Allow ROWs on a case-by-case basis with special management constraints and mitigation.

- Implement Class III and IV VRM Designation.

I have determined that the activities described in the proposed action will not adversely affect or cause loss or destruction of scientific, cultural, or historical resources, including those listed in or eligible for listing in the National Register of Historic Places (40 CFR 1508.27(b)(8)). **Cultural resource surveys were completed (BLM report Number 2014(III)069F). No cultural resources were identified within the project area,the project is not within a Traditional Cultural Property or ACEC.**

The proposed activities are not likely to adversely affect any endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act (40 CFR 1508.27(b)(9)). **The project area is not within any Sensitive species or Threaten and Endangered habitat.**

VI. Public Involvement

The Notice of Staking was made available for the public to review at the Farmington Field Office. No comments were received. The project was posted on the Farmington Field Office NEPA log. No comments were received.

VII. Administrative Review and Appeal

Under BLM regulations, this Decision Record (DR) is subject to administrative review in accordance with 43 CFR 3165. Any request for administrative review of this DR, with or without oral presentation, must include information required under 43 CFR 3165.3(b) (State Director Review), including all supporting documentation. Such a request must be filed in writing with the State Director, Bureau of Land Management, 301 Dinosaur Trail, Santa Fe, NM 87508, no later than 20 business days after this DR is received or considered to have been received.

Any party who is adversely affected by the State Director's decision may appeal that decision to the Interior Board of Land Appeals, as provided in 43 CFR 3165.4.

/s/Maureen Joe
Maureen Joe
Assistant Field Manager
Farmington Field Office

7/29/14
Date