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

Cluster 15

Escrito E07-2407

(ATS-F010-14-122, ATS-F010-14-125, ATS-F010-14-126, ATS-F010-14-127)

Escrito D14-2407

(ATS-F010-14-29 & ATS-F010-14-30)

Escrito L14-2408

(ATS-F010-14-128, ATS-F010-14-129, ATS-F010-14-130, ATS-F010-14-131)

NEPA No. DOI-BLM-NM-F010-2014-0145

I. Decision

I have decided to select the **Proposed Action** for implementation as described in the **Cluster 15 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 Encana O&G (USA) access to their proposed drilling sites in order to horizontally 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 **Cluster 15**. 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 three new well pads, with associated access roads and pipelines will allow Encana O&G (USA) reasonable access to the mineral leases in order to develop the existing leases** 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

Several configurations of the proposed well pads, pipelines, and roads were considered and evaluated by the applicant, BLM, and natural and cultural resources experts using desktop tools and in-field examination. These alternatives were considered but have been eliminated from further consideration as they would have resulted in greater environmental impacts.

Escrito L14-2408

The Escrito L13-2408 location was moved approximately 1 mile to the west and is now the proposed L14-2408. The well pad would have been located at approximately 1,320 FSL and 250 FWL of Section 13, Township 24 North, Range 8 West. The Escrito L13-2408 was designed as a one well location, by moving the location, four wells are now proposed to be drilled from the pad thereby minimizing disturbance and consolidating development.

Escrito D14-2407

The initial staking of this location (1,080 FSL and 250 FWL in Section 13) was moved to avoid sensitive natural resources.

Escrito E07-2407

The Escrito H12-2408 location is being proposed as the E07-2407. The ideal location was originally a two-well pad in Section 8, Township 24, Range 7 West. The following locations were considered but rejected for the reasons outlined below.

- Option 1 (1700 FNL, 450 FWL) – 20 to 40 foot cuts; extensive disturbance and construction
- Option 2 (1800 FNL, 150 FWL) – 10 to 15 foot cuts/fills and 500 foot side hill; cultural sites in area
- Option 3 (1600 FNL, 200 FEL in Sec 17) – cultural sites
- Option 4 (2400 FNL, 400 FWL) – 10 to 20 foot cuts rough topography
- Option 5 (300 FNL, 600 FWL) – 10 to 20 foot cut/fills, 3000 feet of new access
- Two locations in Section 6 were also reviewed, but rejected because of cultural resources

Alternatives were also evaluated to determine the feasibility of liquid storage consolidated facilities to reduce truck traffic, wear and tear on roads, disturbance to

wildlife, and surface disturbance. Consolidated facilities for the Escrito L14-2408 were considered; however, this location was formerly proposed as the Escrito L13-2408, a two well pad. The well pad was moved and proposed as a four-well location. Drilling up to four wells on this location would reduce impacts.

The Escrito E07-2407 was considered for consolidated facilities; however, this location is not considered suitable for consolidated facilities for several reasons:

- The well is exploratory in nature and commercial viability of drilling wells in this area has not yet been demonstrated.
- The location is proposed as a four well pad, which would reduce impacts.
- The location is adjacent to a major road in the area.
- It would be difficult to run a liquids gathering system or three-phase gathering system from this pad to another pad in this early phase of exploration. The Escrito L14-2408 pad is several miles away across some challenging terrain, which would require greater surface disturbance. The greater pipeline length also increases the risk of pipeline blockage with paraffin formation.

No other alternatives were identified that would create less disturbance and still achieve the purpose and need of the proposed action.

V. Rationale for the Decision

Pursuant to 40 Code of Federal Regulations (CFR) 1508.28 and 1502.21, this EA incorporates the information and analysis contained in the 2003 Farmington Proposed Resource Management Plan (PRMP)/Final Environmental Impact Statement (FEIS) (USDI/BLM 2003a). The proposed action would be in conformance with the oil and gas leasing and development management actions in the Resource Management Plan (RMP)/Record of Decision (ROD) signed in December 2003 and updated later that month (USDI/BLM 2003b). The proposed action would be in conformance with the 2003 RMP/ROD that states, to the extent possible, new ROWs will be located within or parallel to existing ROWs or corridors to minimize resource impacts (USDI/BLM 2003b, page 2-11).

The PRMP/FEIS and ROD are available for review at the BLM/FFO in Farmington, New Mexico or electronically at http://www.nm.blm.gov/ffo/ffo_home.html. This project EA addresses site-specific resources and/or impacts that are not covered within the PRMP/FEIS, as required by the NEPA.

Oil and gas development is recognized as an appropriate use of public lands in the FFO planning area (USDI/BLM 2003b). The RMP adheres to the federal mandates contained in the Energy Policy and Conservation Action (42 USC 6217) and Executive Order 13212, that direct federal land management agencies to expedite production of the federal mineral estate for development of reliable domestic energy sources (USDI/BLM 2003b, pages 1 and 11). The proposed project would not conflict with any local, county, or state plans.

A Reasonable Foreseeable Development Scenario (RFDS) developed for the 2003 RMP estimated foreseeable oil and gas development in the New Mexico portion of the San Juan Basin, beginning in January 2002 and lasting 20 years. The RFDS also contemplated that technological advances could alter development of the basin during that 20-year period. The Mancos Shale reservoir was analyzed in the RFDS as an emerging gas play over much of the basin where it had not been developed previously (Engler et al. 2001). The PRMP/FEIS for lands managed by the BLM/FFO indicates development of 9,942 new oil and gas wells from 2003 to 2023 in the San

Juan Basin, allowing for about 16,100 acres of long-term disturbance. The ROD approving the final plan acknowledged these and future projected impacts, when balanced against the nation's need for domestic energy sources (USDI/BLM 2003a, 2003b, page 12). The proposed action is within the scale and pace of the RFDS; therefore, cumulative impacts from the proposed action were included and analyzed in the Farmington PRMP/FEIS (USDI/BLM 2003a).

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 Numbers: 2014(III)030F, 2014(III)033F, &2014(III)031F). Cultural resources were identified within the project areas and will be protected by site barrier fencing and sit monitoring. The project are 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 Escrito D14-2407 and the Escrito E07-2407 projects are not within any Sensitive species or Threaten and Endangered habitat. The Escrito L14-2408 project is located within the new Brack's Cactus mapped area and will follow the Brack's Cactus Interim Guidance. The Escrito L14-2408 project is not within any Threaten and Endangered habitat.**

VI. Public Involvement

The Notice of Stakings were made available for the public to review at the Farmington Field Office. No comments were received. The projects were 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.

Maureen Joe
Assistant Field Manager
Farmington Field Office

01/15/14
Date