

**U.S. Department of the Interior  
Bureau of Land Management**

---

**Decision Record  
Finding of No Significant Impact  
Environmental Assessment  
DOI-BLM-NM-0060-2015-10-EA  
December 2015**

---

**Prairie Dog Population Control at Helium Facility in  
Satanta, Kansas**

---

**U.S. Department of the Interior  
Bureau of Land Management  
Amarillo Field Office  
801 South Fillmore Suite 500  
Amarillo, Texas 79101  
Phone: 806-356-1000  
Fax: 806-356-1041**



**DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
AMARILLO FIELD OFFICE**

**Project: Crude Helium Pipeline Prairie Dog Control**

**EA Log Number: DOI-BLM-NM-0060-2015-10-EA**

**Location: Satanta, Haskell County, Kansas**

**Decision Record**

**DECISION:** It is my decision to implement the Proposed Action to eradicate the prairie dog population at the Satanta Crude Helium Maintenance facility in Haskell County, Kansas. This Environmental Assessment (EA) provides the details of the prairie dog population controls that will be implemented. Short-term impacts that would occur as a result of this proposed action have been analyzed.

**RATIONALE:** "No Action" is not considered a viable option due to the need to provide a safe and healthy work environment for Bureau of Land Management (BLM) employees. The BLM staff have reviewed the Environmental Assessment and identified site-specific mitigation measures to avoid or minimize surface impacts resulting from implementation of the project. The cumulative impacts to the environment from the eradication of prairie dogs at the Satanta Helium Maintenance facility proposed here have been identified. The proposed action is in conformance with the Texas Resource Management Plan and Environmental Impact Statement (August 1995), as amended and its Record of Decision (May 1996) and conforms to the land-use planning terms and conditions required under 43 CFR 1610.5.

**ADMINISTRATIVE REVIEW AND APPEAL:** Under BLM regulations, this decision record is subject to administrative review in accordance with 43 CFR 3165. Any request for administrative review of this decision record must include information required under 43 CFR 3166.3(b) (State Director Review), including all supporting documentation. Such a request must be filed in writing with the State Director, Bureau of Land Management, New Mexico State office, 301 Dinosaur Trail, Santa Fe, NM 87508, no later than 20 business days after this Decision Record is received or considered to have been received.

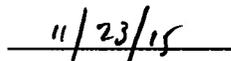
Any party who is adversely affected by the State Director's decision may appeal that decision to the Interior Board of Land Appeals, as provided in 43 CFR 3166.4.

**Approved by:**



Robert Jolley

Field Manager, Amarillo Field Office

  
Date

DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
AMARILLO FIELD OFFICE

Project: Crude Helium Pipeline System Prairie Dog Control

EA Log Number: DOI-BLM-NM-0060-2015-10-EA

Location: Crude Helium Pipeline System in Haskell County Kansas

Finding of No Significant Impact

Based on the analysis of the potential environmental impacts of the proposed action in the attached Environmental Assessment, I have determined that the proposed alternative to eradicate the prairie dog population at the Satanta Helium Maintenance facility is not expected to have significant impacts on the environment and that preparation of an Environmental Impact Statement is not required.

We have looked for endangered and/or listed species at the site of the proposed action and did not find any. We consulted with local, state and federal wildlife experts to determine if they are aware of the existence or possibility of existence of endangered and/or listed species at this site or in the area and were assured that they are not aware of any. We looked for effects on the overall population of prairie dogs in Kansas and, based on the limited number in comparison to the total population relative to the approximately 10 acres of habitat at the Satanta Maintenance facility, we could find no effects. Therefore, based on careful analysis of the situation, the need to protect the pipeline operations and the small population of prairie dogs relatively isolated by farmlands with little to no prairie dogs, the development of an Environmental Impact Statement is not necessary.

Prepared by:

  
\_\_\_\_\_

Cindy Sundblad  
Planning and Environmental Coordinator, AmFO

Date: 11/23/15

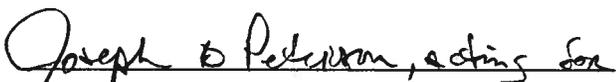
Reviewed by:

  
\_\_\_\_\_

Adrian Escobar  
Natural Resource Specialist, AmFO

Date: 11/23/15

Approved by:

  
\_\_\_\_\_

Robert Jolley  
Field Manager, AmFO

Date: 11/23/15

**Table of Contents**

- Finding of No Significant Impact ..... 1**
- 1.0 INTRODUCTION ..... 3**
  - 1.1 Background..... 3
  - 1.2 Location ..... 4
  - 1.3 Purpose and Need ..... 4
  - Proposal Purpose..... 4
  - Need for Proposal..... 4
  - 1.4 Land Use Plan Conformance..... 5
  - 1.5 Identification of Issues..... 5
- 2.0 PROPOSED Action OPTIONS ..... 6**
  - 2.1 No Action ..... 6
  - 2.2 Proposed Action ..... 6
- 3.0 Affected Environment ..... 7**
  - 3.1 Wildlife..... 9
    - 3.1.1 Threatened and Endangered Species..... 9
    - 3.1.2 Special Status Species..... 10
    - 3.1.3 Migratory Birds..... 10
- 4.0 Environmental Consequences ..... 10**
  - 4.1 Effects from No Action ..... 10
  - 4.2 Effects of Proposed Action ..... 11
  - 4.3 Wildlife ..... 11
    - 4.3.1Threatened and Endangered Species..... 12
    - 4.3.2 Migratory Birds..... 12
  - 4.4 Cumulative Effects..... 13
  - 4.5 Monitoring..... 13
- 5.0 CONSULTATION/Coordination ..... 13**
- 6.0 REFERENCES..... 13**

## 1.0 INTRODUCTION

---

This Environmental Assessment (EA) has been prepared to analyze the potential for environmental impacts and to develop a decision process related to prairie dog population control on the federally owned and managed property associated with the crude helium pipeline at the Satanta, Kansas Pipeline Maintenance Station. The assessment includes procedures for applying eradication measures on Prairie Dogs that occur in the Maintenance Station area. The assessment analyzes potential environmental impacts that could result with the implementation of either the *Proposed Action* or the expected situation if *no action* is taken to control the prairie dog population at the Satanta helium maintenance facility. This EA provides analysis and documentation that complies with the National Environmental Policy Act (NEPA). In addition, the EA provides evidence for determining whether the BLM will make a "Finding of No Significant Impact" (FONSI).

A FONSI is a document that briefly presents the reasons why implementation of the preferred alternative would not result in significant environmental impacts beyond those already addressed in the Texas Resource Management Plan (Texas RMP) (BLM 1996). As defined by the Council on Environmental Quality (CEQ), the significance of a Federal action is determined by the context of the action in relation to the overall project setting, as well as the intensity of direct, indirect and cumulative effects resulting from the project. If the BLM determines that the preferred alternative would not result in significant impacts, a Decision Record (DR) and FONSI would be prepared approving the selected alternative. If the project is found to result in significant impacts, an Environmental Impact Statement (EIS) would be prepared.

### 1.1 Background

The U. S. Department of the Interior, Bureau of Land Management (BLM) Amarillo Field Office (AMFO) operates and maintains the only government helium storage reservoir, plant, and pipeline system in the country. The BLM, in conjunction with private industry, have built a crude helium enrichment unit (CHEU) at the Cliffside site, northeast of Amarillo, Texas. The unit processes about 20 million cubic feet per day of natural gas, and about 2 billion cubic feet per year, accounting for 42 percent of the domestic demand for helium and 35 percent of the global demand. Gas from the Bush Dome reservoir is sent to the CHEU where it is enriched to about 80 percent helium and is then added to the pipeline for delivery to privately owned plants. Helium-rich gas from the reserve is transported along a 424-mile pipeline to 10 privately owned crude helium plants and six privately owned pure helium refineries in Oklahoma and Kansas.

Helium is considered a strategic resource because it is needed to supply the military, industrial uses, and essential civilian needs. Helium is an essential resource for the aerospace industry; computer chip and optical fiber manufacturing; for medical uses including MRI magnet cooling, lung tissue visualization, heart catheterization methods, and medical lasers; aluminum helium arc welding; and scuba diving mixtures. Helium is also used in national defense applications such as rocket engine testing, scientific balloons and blimps, surveillance devices, air to air missile guidance, and systems testing. The most

recognized uses for helium gas are party and parade balloons; however, these make up a very small percentage of the overall demand for helium. For many of these uses, there is no substitute for helium.

## **1.2 Location**

The Satanta Crude Helium Pipeline Maintenance Station was constructed in the early 1960s, based on information provided in the NEPA EA prepared and approved via ROD and FONSI on December 28, 1999 (EA Number 090-001-00, Amarillo, Field Office). The station is located at 37° 26' 53.66" N 100° 57' 45.07" W in Haskell County, Kansas. According to this 1999 EA, the fenced compound encloses approximately five acres along with several standing structures and several pipelines. Please see *Attachment 1* showing a recent satellite view of the facility and area. Please see the map showing location of the Satanta station.

## **1.3 Purpose and Need**

### **Proposal Purpose**

This EA has been prepared to explain the analysis prepared and documented that represent our proposed action and to comply with the requirements of NEPA and the BLM National Environmental Policy Handbook (H-1790-1) to analyze the potential for environmental impacts or proposed prairie dog population control at the BLM-operated Satanta Helium Maintenance Facility to determine if an Environmental Impact Statement is required. As part of the review of the proposed action, State and Federal agencies possessing special expertise and/or jurisdiction in the management of particular resources or species have been consulted to provide the advice regarding potential impacts.

### **Need for Proposal**

We are proposing to control the prairie dog population at the Satanta Helium Maintenance facility because the number of prairie dogs has grown significantly in recent months and they are burrowing very close to the pipeline and the maintenance facility. The situation is exacerbated because their habitat has been controlled and reduced in surrounding farm and ranchlands by population eradication using techniques such as poison baits. The prairie dogs are considered a "nuisance" and a "pest" by most farmers and ranchers because of the disruption that their colonies and burrows cause to farm equipment and operations. *Attachment 1* shows the helium maintenance facility on BLM-owned property with an active prairie dog town located adjacent to the facility.

The prairie dogs at the Satanta Maintenance facility number approximately 227 individuals and 388 burrows, based on a recent survey in early August 2015. This survey will be discussed further in Section 3.0 *Affected Environment*. The increasing numbers in the limited space of approximately 10 acres has resulting in the prairie dogs burrowing near the maintenance facility and the pipeline and possibly chewing on various cables for communication and electricity. For example, internet communication is often disrupted and service checks to investigate the causes indicate that the physical line may be compromised by prairie dog activity.

The proposed action to eradicate the 10 acre prairie dog population is needed for the continued safe operation of the Satanta Kansas maintenance facility to provide Helium at a steady rate so that the requirements of the 1996 Helium Privatization Act are met, contractual obligations are fulfilled, and global helium needs are provided for.

## **1.4 Land Use Plan Conformance**

The proposed action is subject to and has been reviewed for conformance with (43 CFR 1610.5, BLM 1617.3) the Texas Resource Management Plan (RMP) (May 1996), as amended. The Texas RMP and Record of Decision describe management decisions based on resource and surface management ownership areas. At the time of preparation and development of the RMP the Amarillo Helium Operations Office was a part of the Department of Interior, Bureau of Mines (BM). At the dissolution of the BM, the Amarillo Helium Operations Office was transferred to the BLM. Transfer of the Helium Operations Office in Amarillo from the jurisdiction of the BM to the BLM resulted in the need to amend the Texas RMP. The Texas RMP was amended in 2000 to include the AMFO.

The proposed action is in conformance with the applicable RMP, even though it does not specifically address the Cliffside Gas Field or the helium pipeline. The proposed action is consistent with the goals and objectives of the plan, as well as those for the BLM's helium resources program.

## **1.5 Identification of Issues**

Internal scoping was conducted by reviewing the proposed project and locations to identify potentially affected resources and land uses. The Interdisciplinary Team (IDT) identified resources and land uses present and affected by the proposed project and focused the analysis on those issues. The following questions were raised as issues to consider further:

- What effect *will* the proposed action have on the habitat for the prairie dog population?
- What effect *will* the proposed action have on other species that rely on the habitat created by the prairie dogs?
- What effect *will* the proposed action have on known and newly discovered artifacts or areas of cultural, paleontological, and archeological significance? A previous EA from 1999 covered this potential issue
- What effect *will* the proposed action have on federally listed and state-listed species that have the potential to be located in the proposed project area? These species may include black footed ferrets and other species known to be associated with prairie dog colonies.
- What effect *will* the proposed action have on Migratory Bird species? Burrowing owls are seasonal residents of prairie dog habitat.
- What effect *will* the proposed action have on wildlife and their habitat in general?

Several issues were considered during project scoping but dismissed from detailed analysis because there would be no potentially significant effects related to the issues resulting from any of the alternatives presented below. The following elements are determined by the IDT, following onsite visits, review of the Texas RMP (1996), as amended and other data sources, to not be present:

- Environmental Justice
- Areas of Environmental Concern
- Wild Horse and Burros
- Recreation
- Mineral Resources
- Climate Change
- Watershed
- Water Quality and Quantity
- Non-native species
- Wild and Scenic Rivers
- Wilderness
- Cave and Karst
- Hazardous Wastes
- Wetland/Riparian Areas
- Socioeconomics
- Floodplains
- Visual Resources
- Livestock grazing

## 2.0 PROPOSED ACTION OPTIONS

---

This EA analyzes the impacts of *No Action* and the *Proposed Action* relating to prairie dog population control and prevention of continuing helium maintenance facility and pipeline damage proposal.

### 2.1 No Action

CEQ regulations require the consideration of *No Action* (40 CFR 1502.14). The BLM NEPA Handbook (H-1790-1) states that for EAs on externally initiated proposed actions, a no action alternative generally means that the action would not take place. Under this alternative, the BLM would not authorize prairie dog population control for the Satanta, Kansas Maintenance facility. The proposed population control would not be conducted. Damage to helium maintenance facilities would continue and present potential threats to the operation of the pipeline as well as harm to employees, the public and the environment in the event of an accident or uncontrolled release from the pipeline.

### 2.2 Proposed Action

The *Proposed Action* is to control the prairie dog population at the Satanta, Kansas maintenance facility by eradication of individual prairie dogs using approved toxins. Use of vacuum devices for extracting and collecting or gas exploding equipment for destroying burrows is not legal in Kansas. Prairie dog management programs and control laws exist and we have sought out consultation and guidance from Mr. Charles Lee, longtime Kansas State University wildlife specialist and prairie dog management consultant. Mr. Lee provided options for prairie dog population management in a verbal discussion with BLM Environmental Coordinator, Cindy Sundblad on April 13, 2015. The following list of prairie dog population controls and discussion is derived from the discussion and the consultation documents authored by Mr. Lee and provided in Section 6.0 References:

- Shooting
- Poison baits
- Burrow fumigants
- Predator attractants

The following assessment of prairie dog control options is based on Mr. Lee's guidance and provides the basis for determining the best option.

### ***Shooting***

Intensive rifle shooting during the breeding season (February) is used to disrupt prairie dog reproductive activities and prevent colony spreading. According to Mr. Lee's 2006 bulletin, it is not likely that shooting will ever be considered successful eradication as a population management technique. Shooting is not an option on this property since no weapons are allowed at the Federally-owned facility.

### ***Toxicants-Poison Bait and Burrow Fumigants***

Toxicants that can legally be used in Kansas include poison grain or pellet baits and fumigants. Great caution must be used in the application of either of these eradication methods because of the non-selective nature that does not target a particular species. The poison baits may affect a variety of birds and mammals that inadvertently consume the bait. Fumigants kill all wildlife found in the burrows. In addition, baiting is only effective during calm weather because the poison can be washed away with precipitation.

### ***Predator Attractants***

The black-footed ferret is an endangered species that feeds on prairie dogs. It is illegal to kill them. They are seldom observed because they have low population densities and are primarily active at night. Introduction of the black-footed ferret into the area would require permission and assistance by the U.S. Fish and Wildlife Agency because of their designation as an endangered species. In May 2015, federal wildlife managers released 20 captive-bred black-footed ferrets into the 27-square-mile Rocky Mountain Refuge near Denver, Colorado to help control the prairie dogs that are threatening newly restored native prairie. In comparison, the helium maintenance facility at Satanta, Kansas is limited to 10 acres surrounded by active farmland and does not make this a viable alternative. If black-footed ferrets were introduced to the area, they would run out of prairie dogs as food sustenance likely within the first year, since a ferret needs approximately 100 to 150 prairie dogs per year to survive (see Reference 10). Mr. Lee does not believe black-footed ferrets would be found in this area of Kansas farmland.

## **3.0 AFFECTED ENVIRONMENT**

---

This section describes the environment that would be affected by implementation of the proposed action described in Section 2. Aspects of the affected environment described in this section focus on the relevant resources and issues that need consideration in relation to the proposed action. Certain critical environmental components require analysis under BLM policy. Only those elements of the affected environment that have potential to be impacted are described in detail. In this case, the context of the proposed action for prairie dog management is in relation to the approximately 10 acre helium maintenance facility. *Attachment 2* provides a satellite photo of the Satanta helium facility and evidence of expansion of the prairie dog town on BLM lands to private lands to the west. These neighbors have expressed concern that the prairie dog town will continue to migrate and impact their lands if we do not control the population on the BLM lands. Analysis of the intensity of the proposed action may be construed in relation to the broad base of surrounding farmland that can be seen in *Attachment 3*

where prairie dog habitat is controlled by the private land owners. Consequently, the BLM facility acts as a protected area for prairie dogs that have survived eradication from the surrounding farmland.

Prairie dogs are now considered a “keystone species” that provide a habitat that attracts many other species, including black-footed ferrets, badgers, coyotes, foxes, prairie falcons, ferruginous hawks and eagles. These species are predators and the prairie dogs are an important part of their natural diet. Prairie dogs provide valuable habitat for the burrowing owl, a seasonal migrating bird. Prairie dogs are ecological engineers that create burrowing systems and maintain short grass and forb coverage on the surface and throughout their towns and colonies. Burrowing owls use abandoned or seldom-used burrows for nesting and they require the short vegetation maintained by the prairie dogs to allow them better observation for potential predators.

Assal and Sovell provide compelling summarization of the plight of the black tailed prairie dog in their 2004 report for the BLM that is based on their research over four counties in northeastern Colorado. The black prairie dog historically has been found from southern Texas to North Dakota, Wyoming and Montana near the Canadian border with the United States. Significant population impacts have contracted their habitat and occurrence during the past century that are attributed to three things: range was converted to farmland; large scale poisoning, and sylvatic plague capable of killing 99% of colonies population has severely impacted the species. According to their research, approximately 20 percent of the original range no longer contains prairie dogs, and that was 10 years ago.

The current condition of black-tailed prairie dog habitat in western Kansas, Hastert County near Satanta is rural, farm and pastures, and mostly devoid of prairie dogs, most likely because the landowners have used eradication techniques to clear their lands of the rodents. Several articles are available to provide a summary of the overall status of prairie dog populations across their historically known habitat boundaries in the western United States. A useful reference for regional consideration of the total population and a targeted view of the small population found at the Satanta maintenance facility is Mulhern and Knowles paper, “Black-Tailed Prairie Dog Status and Future Conservation Planning.” The authors reference Miller, et al 1994 estimation that “all species of prairie dogs may have declined by as much as 98% during the first half of this century”, referring to 1900 to 1950 as the population or humans spread and settled more of the western U.S. Threats to prairie dogs include loss of prairie, eradication or control efforts, prairie dog shooting, and sylvatic plague.

In Kansas, there are a few areas left where prairie dogs have not been eradicated for farming or livestock purposes. Mulhern and Knowles reported in 1999 that the National Park Service estimated approximately 16 hectares (39.5 acres) of prairie dogs at the Fort Larned National Historic Site and on the Cimarron National Grassland southwest of the Satanta maintenance facility; the Forest Service estimated 440 hectares (1,087 acres) of active prairie dog colonies.

In reference to eradication or control efforts, Mulhern and Knowles observe that “most poisoning on federal land is due to private land concerns, not necessarily federal forage concerns.” And, that is a relative concern for the Satanta helium maintenance facility because the surrounding landowners do not want the prairie dogs migrating to their private properties.

An EA was prepared in 1999 to address the *Proposed Action*, purpose and need for the construction of the Satanta helium maintenance facility. That EA provides background on the affected environment and consultation with experts. The Kansas State Historic Preservation Office reviewed the project and determined that it did not impact any property listed on the National Register of Historic Places. In addition, U.S Fish and Wildlife Service was consulted in 1999 for the referenced EA and determined that the proposed building of the maintenance facility “would not likely affect any wetland, riparian zones, Federal or state threatened or endangered plant or animal species, designated critical habitat, species proposed for listing, species under review by the U.S. Fish and Wildlife Service or any other special status species. The consultations documented in this EA are found in the References section.

BLM Amarillo Field Office’s Natural Resource Specialist and Environmental Coordinator performed a recent survey of the area on August 4 and 5, 2015 around and within the helium maintenance facility at Satanta. The survey indicates a growing population of prairie dogs based on the number of young juveniles observed and the new burrows. The area has had plentiful rainfall this year that has provided plenty of forage and consequently the prairie dog population has surged. Our survey estimated approximately 200 prairie dogs and approximately 400 burrows. In addition, we found that approximately 16 burrowing owls use the prairie dog habitat. A badger has been seen by staff at the facility, although we did not see it during our surveys. A night spotlight survey did not indicate other predators of the prairie dogs, such as ferrets.

### **3.1 Wildlife**

#### **3.1.1 Threatened and Endangered Species**

Approximately 1300 endangered or threatened species occur in the United States today. Endangered species are plants and animals that have become so rare that they are in danger of becoming extinct or are considered extinct in the wild. Threatened species are plants and animals that are likely to become endangered within the foreseeable future throughout its range (Endangered Species Protection Program/EPA.gov). The Endangered Species Act of 1973 is designed to protect critically imperiled species from the consequences of anthropogenic activities. The Act is administered by the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration.

Per the following stipulation that will be included in the current update to the RMP the following statement will be applied to the BLM’s helium maintenance facility in Kansas:

#### ***Black-Footed Ferrets in Kansas/Consultation Stipulation***

“If black-footed ferrets occur anywhere in Kansas, they are presumed to be associated with prairie dogs. All or portions of this lease area lie within a county of Kansas where prairie dog towns have occurred in the past. Therefore, if a prairie dog town of eighty acres or more is found to occur on or near this lease, a black-footed ferret survey may be required before permitting surface disturbing activity which may impact the prairie dog town.”(CSU) Based on the eighty acre criteria for assumption of the potential to find endangered black-footed ferrets, it is not logical that any of the species would be found on the 10 acre prairie dog town that is

surrounded by active farmland that show little to no signs of burrowing or prairie dog activity. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. § 1531 et seq., including completion of any required procedure for conference or consultation.

### **3.1.2 Special Status Species**

The group of species referred to here, and in the attached biological evaluation, as special status species (SSS) includes federal and state listed threatened or endangered plant or animal species, species proposed for listing and species under review by the U. S. Fish and Wildlife Service (FWS), Kansas Department of Wildlife & Parks (KDWP). The authority for this policy and guidance regarding the evaluation of SSS comes from the Endangered Species Act of 1973, as amended; the Federal Land Policy and Management Act (FLPMA) of 1976; and Department of Interior, Bureau of Land Management, Special Status Species Management (Manual 6840). There are no Wilderness Study Areas (WSA's) or Special Management Areas (SMA's) within the proposed area (Table 4). Burrowing owls are present and our August 2015 survey indicated approximately 16 individuals are using the prairie dog habitat.

### **3.1.3 Migratory Birds**

The central flyway is a bird migration route that begins in the north in Canada and generally meanders along the Great Plains and goes through the Gulf of Mexico. Migrating birds use this flyway between breeding and wintering seasons and often use the region as a stop-resting and foraging ground. Common migratory bird species that occur near the proposed project area are too numerous to list in this document, however, migrating birds observed at the specific site are protected under the Migratory Bird Treaty Act of 1918. The Migratory Bird Treaty Act makes it unlawful, without a waiver, to pursue, hunt, take, capture, kill, or sell birds that are considered migratory. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests. There are currently over 800 species on this list, several species of which have been observed in the proposed project area. Burrowing owls are present in the prairie dog habitat. Approximately 16 were counted in our August 4, 5, 2015 survey.

## **4.0 ENVIRONMENTAL CONSEQUENCES**

---

### **4.1 Effects from No Action**

There would be no control of prairie dog population or habitat and the prairie dog population would likely ebb and flow naturally. Increases in population will likely continue to spill over into neighboring private farmlands. Population control of prairie dogs would likely result in continued intense population at the Satanta facility with associated stresses on helium facility assets.

## 4.2 Effects of Proposed Action

I spoke with Mr. Lee about our prairie dog problem at our Satanta Crude Pipeline Helium Maintenance facility in southwestern Kansas and our belief that they are encroaching on the helium pipeline and possibly creating some damage to buried cables and the pipeline. Management and operations personnel have requested that we get rid of the problem. His advice was that we need to either kill or capture the prairie dogs. Mr. Lee confirmed that attitudes in most of Kansas where people make their living from the land with farming or ranching, is that the prairie dogs are pests and they do not like them. So they tend to poison or use a toxicant to eradicate them from their land. Burrowing owls and rattlesnakes that use the burrows will leave the area after the prairie dogs have been killed. Don't apply toxicants while the burrowing owls are present. There are 3 options for use of toxicants:

1. RoZol Prairie Dog Bait,
2. Kaput-D Prairie Dog Bait (diphacinone),
3. Fumigants: Aluminum phosphide, magnesium phosphide and smoke cartridges.

Fumigants are the most commonly used and you need two people to apply and a vehicle with a placard identifying the toxicant is in transport. Mr. Lee states that he does not need to visit the site to provide his advice. He confirmed that there are approximately 200,000 acres of prairie dog habitat remaining in Kansas. Mr. Lee emailed me a copy of a KSU publication titled "*Prairie Dog Management and Calendar of Action*" to assist us in determining how to control the prairie dog population using methods accepted and legal in Kansas. See Attachment.

The state of Kansas has extension offices that can assist BLM in recommending which toxicant is the preferred method. Our natural resource specialist, Adrian Escobar has spoken with the local extension office located in nearby Sublette They recommend applying Rozol poison bait and monitoring the area over a two week period following treatment. The monitoring is needed to ensure that the dead prairie dogs are not lying out in the open for predatory species to consume and thereby become sick or dead, unintentionally. According to Mr. Lee, the Rozol-poisoned bait must be applied to the prairie dog burrows by an individual that is licensed under Kansas state requirements. Therefore, proper procedure would be to contract the Rozol application services in Kansas to assure proper treatment.

## 4.3 Wildlife

The composition and population levels of the species of wildlife that are or could be using this 10 acre habitat would go through seasonal and year-to-year fluctuations directly related to vegetation condition factors at the site. These adjustments would be exhibited by the wildlife populations present. A badger has been observed near the facility and is likely feeding on the prairie dogs. It is likely that the badger may ingest some of the poison bait and/or poisoned prairie dogs.

### ***Mitigation Common to All Species***

Excessive distribution of the prairie dog control measures will be avoided at all times. Monitoring for any ground-nesting species that can potentially occur in the proposed area will be conducted before any disturbance commences.

#### **4.3.1 Threatened and Endangered Species**

No known threatened or endangered species occur in the counties near the Satanta, Kansas facility. A wildlife survey of the sight was conducted on August 3 and 4, 2015 by Cindy Sundblad, BLM Environmental Coordinator at the Amarillo Field Office and Adrian Escobar, the BLM Natural Resources Specialist for the Cross Bar property adjacent to the Amarillo Cliffside Gas field, operated by BLM. We found no evidence of black footed ferrets in a brief, but intensive night spotlight survey looking for signs of the endangered species. The black footed ferret's primary source of food is the prairie dog, so the survey was conducted to ensure that there is no evidence that they have found a way into the small 10 acre habitat.

State and federal agencies were consulted as part of the BLM's 1996 RMP for information regarding county specifically listed threatened or endangered species. It would be the policy of the BLM to follow federal and state guidelines set forth regarding species disturbance for planned spraying throughout the where the species occur at that point in time. More specifically, the state and federal agencies were again consulted in 1999 as part of our NEPA considerations prior to construction of the Satanta facility. The EA documenting the proposed construction references review of the area by U.S. Fish and Wildlife and the Kansas Department of Wildlife and Parks. Their review determined that the proposed action "was not likely to affect any wetland, riparian zone, Federal or state threatened or endangered plant or animal species."

### ***Mitigation***

Before and during prairie dog control activities the area will be monitored for the presence of federally and state listed special status species. Surface disturbance will be limited to the least area possible.

#### **4.3.2 Migratory Birds**

Migratory birds occur throughout the area as the location of the Satanta, Kansas facility is located in the central flyway. The list of migratory birds is too numerous to list in this document; however, birds common to the area have been observed and documented through state and federal wildlife departments. Our primary concern is protection of the burrowing owls that have been observed and survey on the property. These burrowing owls will not be affected by the proposed action because no eradication of prairie dogs will take place until the owls have migrated from the area. We anticipate the burrowing owls will migrate away from the area in October and do not expect them to return to the area until spring 2016.

It is important to understand and accept that poisoning the prairie dogs in order to eradicate them will also drive out the burrowing owls that have been observed using the prairie dog habitat. Several studies

indicate that burrowing owls will only use poisoned prairie dog towns for a few years after eradications since the engineering and maintenance of the burrowing system, surface mounds and short grasses no longer exists (see photos below.)



**Photos of burrowing owls and prairie dogs at Satanta helium maintenance facility, August 3 & 4, 2015**

### ***Mitigation***

The proposed site will be monitored for migratory bird movement, with a focus on the burrowing owls that have been observed, surveyed and nesting. Encounters of migratory bird nests on the proposed project area are not expected, however, if a nest is encountered an evaluation for disturbance and avoidance will be conducted. Poisoning prairie dogs must occur when the burrowing owls are no longer present.

Rozol poison bait comes in a granular form and is applied inside the burrow. It is an anticoagulant and can easily be consumed by non-target species. Much follow-up is required after using Rozol. Often times, the granules are pushed out of the burrow making it accessible to other species. Therefore monitoring will be required to move the exposed granules back into the burrow. In addition, dead prairie dogs found above ground must be buried in a burrow to avoid secondary poisoning by a predator.

Application of the Rozol requires a certified applicators license. BLM will contract with a certified applicator in Kansas and monitoring of the site after application will be done by BLM employees, including our Natural Resources Specialist, Adrian Escobar and the Environmental Coordinator, Cindy Sundblad.

#### **4.4 Cumulative Effects**

There may be short-term impacts to resident wildlife such as the badger known to occupy some of the burrows or other species that may traverse the property during the prairie dog eradication process. The area is surrounded by active farm land and does not provide good wildlife habitat due to the frequent disturbances related to farming activities. Special status species are not known to occur in the area and we do not anticipate any anomalous activity during the fall time frame planned for distribution of the Rozol toxic bait.

#### **4.5 Monitoring**

Implementing the proposed action would have no cumulative impacts on any resource. Close monitoring of the site is planned for at least a two-week period to ensure no surface exposure of the Rozol bait or contaminated prairie dogs occurs. This will prevent inadvertent consumption by other wildlife that may happen into the area. No exposure to humans is expected because the workforce at the Satanta facility will be advised to avoid the Rozol bait and prairie dogs. The site is secured by a locked gate to prevent trespassing and this will control inadvertent exposure of non-work force humans.

### **5.0 CONSULTATION/COORDINATION**

---

This section includes the resource specialists located within the AmFO and the OFO that specifically participated and provided input in review of the proposed project and development of this EA document.

Adrian Escobar, Natural Resource Specialist, Amarillo Field Office, conducted field survey on August 4 and 5, 2015 for population estimate of black-tailed prairie dogs and burrowing owls, and observations for other species, including black-footed ferrets or other predators at the Satanta, Kansas helium maintenance site.

Charles Lee, verbal consultation with Cindy Sundblad, on April 13, 2015 regarding black-tailed prairie dogs and impacts to Satanta, Kansas helium pipeline operations.

George Thomas, Wildlife Biologist, BLM Tulsa Office.

Ryan Howell, Archeologist, BLM Tulsa Office.

### **6.0 REFERENCES**

---

1. Assal, Timothy J. and John R. Sovell. March 2004. *"BLACK-TAILED PRAIRIE DOG SURVEYS OF BLM LANDS IN EASTERN COLORADO"*, A Report to the Bureau of Land Management, Canon city Office

- by The Colorado Natural Heritage Program, Colorado State University. (Reviewed for reference to prairie dog population trends and habitat requirements.)
2. US BLM. *Environmental Assessment Satanta Crude Helium Pipeline Maintenance Station Construction*, EA Number 090-001-00, Amarillo Field Office, December 28, 1999.
  3. Lee, Charles. *Prairie Dog Management*, Kansas State University, March 2006.
  4. Lee, Charles. *Prairie Dog Management and Calendar of Action*, Kansas State University guidance document.
  5. Henderson, F. Robert. *Controlling Prairie Dog Damage*, Cooperative Extension Service, Kansas State University, October 1989.
  6. McCain, Lauren, Richard P. Reading, PhD., and Brian J. Miller, PhD. "Prairie Dog Gone"; 4/17/2015, published at [www.publiclandsranching.org/wr\\_prairie\\_dog\\_gone.htm](http://www.publiclandsranching.org/wr_prairie_dog_gone.htm)
  7. Mulhern, D. W., and C. J. Knowles. 1995. *Black-tailed prairie dog status and future conservation planning*. Rocky Mountain Range and Experiment Station Technical Report. RM-GTR-298.
  8. USDI (BLM). August 1995. *Texas Resource Management Plan and Final Environmental Impact State*. Tulsa, Oklahoma.
  9. USDI (BLM). May 1996. *Record of Decision and Final Texas Resource Management Plan*. Tulsa, Oklahoma.
  10. U.S. Fish and Wildlife Service, *Black-footed Ferret , Mustela nigripes*, Informational Brochure, Mountain-Prairie Regions 6, September 1015 publication.
  11. "Endangered ferrets to be released at once-toxic Rocky Mountain refuge," Denver Post article by Bruce Finley, May 8, 2015.



Attachment 2  
Prairie Dog Town Has Expanded West of BLM Property  
Satanta, KS



Attachment 3  
Prairie Dogs Eradicated From Surrounding Private Farmlands  
Satanta, KS

