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Given the topographic nature of the area, BLM needs to consider compaction standards and QA/QC testing protocol for roads and constructed well sites. These considerations would help ensure safety to landowner, operator(s), and BLM personnel during the wells productive life and would ensure erosional stability. Additionally, good compaction standards would allow the operator to use the full extent of a constructed well site - thereby allowing them to minimize their size.

Additionally, considering the topographic nature of the area, Site Specific Reclamation Analyses need to be considered for any of the wells that have concerns for "expedient reclamation." This term is not defined or explained anywhere in the EA and without knowing what the MSUP contains, it is impossible to know if the operator has enough information to know what they must do and if the BLM can adequately assess performance standards.

Thanks!

Pro Balanced Use

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