

DECISION RECORD
Exception to Greater Sage-Grouse Timing Restrictions for 2 Pad Proposals
Environmental Assessment (EA), WY-070-EA14-91
Bureau of Land Management, Buffalo Field Office, Wyoming

DECISION. The BLM approves two exception requests for relief from Greater Sage-Grouse (GSG) timing restrictions from March 15 to June 30, 2014 in general habitat. Sampson Resources Company (SRC) and Devon Energy Production Company, LP (DEP) proposed construction and drilling at two locations from March 15 to June 30, 2014. To mitigate the potential effects of these activities, SRC and DEP committed to invasive species control measures in Greater Sage-Grouse (GSG) priority (core) habitat as described in Alternative B of the environmental assessment (EA), WY-070-EA14-91, incorporated here by reference.

Compliance. This decision complies with or supports:

- Federal Land Policy and Management Act of 1976 (FLPMA) (43 USC 1701); DOI Order 3310.
- Mineral Leasing Act of 1920 (MLA) (30 U.S.C. 181); including the Onshore Oil and Gas Orders.
- National Environmental Policy Act of 1969 (NEPA) (42 USC 4321).
- National Historic Preservation Act of 1966 (NHPA) (16 USC 470).
- Buffalo Resource Management Plan (RMP) 1985 and Amendments (1985, p28; 2001 errata p. 38).
- Buffalo and Powder River Basin Final Environmental Impact Statements (FEISs), 1985, 2003 (Appendix P. P-8) (2011).

BLM summarizes the details of the approval of Alternative B below. Alternative B represents BLM and WY Game and Fish Department (WGFD) changes to the proposal, including adjustments to the disturbance/mitigation ratio. The changes were vetted and accepted by SRC and DEP.

Pad and Well Sites (outside of Core). BLM approves an exception to GSG timing limitations at SRC’s Kansas and DEP’s IRF 214276-2FH well pads and support facilities which are outside of GSG core areas:

Pad Name	Twp	Rng	Sec	Qtr
Kansas	43N	76W	27	SWSW
IRF 214276-2FH	42N	76W	21	SESW

Regional Mitigation Area within GSG Priority (Core) GSG Habitat. SRC proposed mitigation in the 2012 Cato Fire scar. The BLM identified a more appropriate area supporting more GSG on private, State and BLM controlled surface. Scoping efforts indicated that moving the proposed mitigation to the south would be a greater benefit to habitat associated with active GSG leks. The mitigation area is within the GSG Buffalo Core Population Area, is predominantly on private lands, and has landowner agreement. See the administrative record (AR) for the mitigation area map.

Limitations. See the conditions of approval (COAs) in the APD approvals and supporting EA, WY-070-EA-13-137.

THE FINDING OF NO SIGNIFICANT IMPACT (FONSI). Analysis of BLM/WGFD-modified Alternative B of the EA, WY-070-EA14-91, and the FONSI (both incorporated here by reference) found SRC’s and DEP’s proposals for an exception to seasonal timing restriction from March 15 to June 30, 2014, and to implement a regional mitigation approach that restores and/or enhances GSG priority (core) habitat will have no significant impacts on the human environment, beyond those described in the PRB FEIS. This project also tiers to the SRC’s North Tree Phase 1, Plan of Development (POD) EA, WY-070-EA13-77, DEP’s Spruce 3 and 4 POD CX3, WY-070-390CX3-14-72, and WY-070-EA-13-137 - which found no significant impacts to the environment. There is no requirement for an EIS.

COMMENT OR NEW INFORMATION SUMMARY. BLM posted the APDs concerning the Kansas and the IRF 214276-2FH pads for 30 days, received no comments, internally scoped them, completed its analysis, and issued a finding and decision that did not receive appeal. BLM posted the Invasive Species Management EA, WY-070-EA-13-137 for 30 days, received no comments, internally scoped, completed analysis, and issued a finding and decision that did not receive appeal. BLM recently received a policy clarification on offsite mitigation, BLM Instruction Memorandum (IM), 2013-142, Interim Policy, Draft - Regional Mitigation Manual Section-1794.

DECISION RATIONALE. I approve SRC and DEP request for an exception to the GSG seasonal timing restriction from March 15 to June 30, 2014. This exception is granted for SRC's Kansas Pad and DEP's IRF 214276-2FH Pad infrastructure (both are in general GSG habitat) that was imposed by COAs in the North Tree Phase 1, and the Spruce 3 and 4 POD based on the following:

1. The exception pad locations *are not* within BLM designated priority habitats for GSG. The proposed mitigation area is within the Buffalo GSG Core Population Area, and is considered priority habitat.
2. The two well pads are in similar ecological settings outside of GSG priority habitat. The pad locations are in an area that has a high degree of energy development, significantly reducing the effectiveness of GSG habitat, thus reducing the potential for negative impacts to breeding or nesting GSG.
3. The offsite mitigation in this proposal, in priority GSG habitat, was designed in coordination with habitat biologists for the (WGFD). The proposed ratio of affected acres and treatment acres was modified by WGFD biologists to appropriate, site-specific, levels during the development of this proposal.
4. The control of invasive, annual grasses is scientifically recognized as a valid method to improve GSG habitat. (see National Greater Sage Grouse Conservation Measures/Planning Strategy page 25)
5. BLM and the operators will use monitoring described in the EA and COAs to ensure they meet metrics of the offsite mitigation proposal.
6. There are no conflicts anticipated or demonstrated with current uses in the mitigation area.
7. The use of offsite mitigation in this specific circumstance finds scientific support among wildlife biologists from multiple agencies and backgrounds and will add value to GSG habitat improved.
8. The approved exception for GSG seasonal timing restrictions for these two projects is a pilot effort implemented from March 15 to June 30, 2014. The project is intended to research and develop implementation of a regional mitigation approach that restores and/or enhances GSG habitat priority (core) habitat, and will not result in any undue or unnecessary environmental degradation.
9. Continuous drilling for the 2014 season will allow for the faster interim reclamation at the well pads. This should result in better top soil viability, decreased opportunities for weed establishment, and ultimately better final reclamation.
10. This request conforms to the Buffalo RMP, specifically the Powder River Basin (PRB) Oil and Gas Project Record of Decision (ROD), pp. 12-14; WY-070-EA-13-137 Invasive Species Management EA; BLM and the State of Wyoming GSG conservation strategies; BLM Instruction Memorandums (IMs) 2012-019, [GSG] Habitat Management Policy on Wyoming [BLM] Administered Public Lands Including Federal Mineral Estate; 2013-142, Interim Policy, Draft - Regional Mitigation Manual Section-1794; and WY Executive Order, 2011-5, [GSG] Core Area Protection.
11. The implementation of a regional mitigation approach that restores and/or enhances GSG habitat priority (core) habitat has the support of affected landowners, Johnson County Weed and Pest Board, the WGFD, Wyoming Office of State Lands and Investments, and the Natural Resources Conservation Service.
12. Application of herbicide in the mitigation area will be implemented through the Johnson County Weed and Pest District.
13. The benefit from the proposed mitigation is intended to compensate for potential negative impacts to GSG from allowing drilling activities at the Kansas and the IRF 214276-2FH pad locations during the GSG breeding and nesting season.

ADMINISTRATIVE REVIEW AND APPEAL. This decision is subject to administrative review according to 43 CFR 3165. Request for administrative review of this decision 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, P.O. Box 1828, Cheyenne, Wyoming 82003, no later than 20 business days after this Decision Record is received or considered to have been received. Parties 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.

Field Manager: 

Date: 3/7/14

FINDING OF NO SIGNIFICANT IMPACT
Exception to Greater Sage-Grouse Timing Restrictions for 2 Pad Proposals
Environmental Assessment (EA), WY-070-EA14-91
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FINDING OF NO SIGNIFICANT IMPACT (FONSI). Based on the information in the EA, WY-070-EA14-91, which BLM incorporates here by reference; I find that: (1) the implementation of BLM-modified Alternative B will not have significant environmental impacts beyond those addressed in the Buffalo Final Environmental Impact Statement (FEIS) 1985, and the Powder River Basin (PRB) FEIS, 2003 (2011), Buffalo Field Office's Invasive Species Management EA, WY-070-EA-13-137, the Samson Resources Company's (SRC's), North Tree Phase 1 EA, WY-070-EA13-77, Devon Energy Production Company LP's (DEP's) Spruce 2 POD EA, WY-070-EA13-240 and Spruce 3 and 4 Categorical Exclusion 3 (CX3), WY-070-390CX3-14-67-78; (2) BLM-modified Alternative B conforms to the Buffalo Field Office (BFO) Resource Management Plan (RMP) (1985, 2001, 2003, 2011); and (3) BLM-modified Alternative B does not constitute a major federal action having a significant effect on the human environment. Thus, an EIS is not required. I base this finding on consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), with regard to the context and to the intensity of the impacts described in the EA, and Interior Department Order 3310.

CONTEXT. The PRB FEIS foreseeable development analyzed the development of 54,200 wells. The treatment proposals are designed to restore and/or enhance Greater Sage-Grouse (GSG) priority (core) habitats. The GSG habitat effectiveness in the areas at and adjacent to the SRC Kansas and the DEP IRF 214276-2FH pads is compromised by existing development. The population benefit for GSG gained from a seasonal timing restriction in a developed fluid mineral field will have minimal effects due to the very small potential that GSG nest near these pads. On a local and regional basis, restoring and/or enhancing GSG priority (core) habitat will likely benefit GSG habitat quality, and leverage ongoing habitat improvement efforts in the mitigation area. This proposal meets the intent of BLM Instruction Memorandum IM-2012-019 p. 7, exceptions.

Extensive locally collected scientific data collection in the Buffalo planning area demonstrates continued negative GSG population response in the PRB despite BLM's application of RMP prescribed GSG-focused mitigation measures. These proposals provide a means to benefit populations in GSG priority (core) habitats, an action supporting Wyoming and national GSG conservation goals.

INTENSITY. The implementation of BLM-modified Alternative B will result in beneficial effects in the forms of improving and/or enhancing GSG priority (core) habitat and energy production. The preferred alternative does not pose a significant risk to public health and safety. The geographic area of project does not contain unique characteristics identified in the 1985 RMP, 2003 (2011) PRB FEIS, or other legislative or regulatory processes. BLM used relevant scientific literature and professional expertise in preparing the EA. The scientific community is reasonably consistent with their conclusions on environmental effects relative to offsite mitigation and/or oil and gas development (Doherty et al. 2011). Research findings on the nature of the environmental effects are not highly controversial, highly uncertain, or involve unique or unknown risks. The PRB FEIS predicted and analyzed oil development of the nature proposed with this project and similar projects. The selected alternative does not establish a precedent for future actions with significant effects. There are no cultural or historical resources present that will be adversely affected by the selected alternative. The project area is clearly lacking in wilderness characteristics as it has less than federal 5,000 acres. No species listed under the Endangered Species Act or their designated critical habitat will be adversely affected. The selected alternative will not have any anticipated effects that would threaten a violation of federal, state, or local law or requirements imposed for the protection of the environment.

ADMINISTRATIVE REVIEW AND APPEAL. This finding is subject to administrative review according to 43 CFR 3165. Request for administrative review of this finding 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, P.O. Box 1828, Cheyenne, Wyoming 82003, no later than 20 business days after this FONSI is received or considered to have been received. Parties adversely affected by the State Director's finding may appeal that finding to the Interior Board of Land Appeals, as provided in 43 CFR 3165.4.

Field Manager: 

Date: 3/7/14

ENVIRONMENTAL ASSESSMENT (EA), WY-070-EA14-91
Exception to Greater Sage-Grouse Timing Restrictions for 2 Pad Proposals
Bureau of Land Management, Buffalo Field Office, Wyoming

1. INTRODUCTION

BLM provides an EA for Samson Resources Company (SRC) and Devon Energy Production Company LP's (DEP) requests for an exception to the Greater Sage-Grouse (GSG) timing limitation imposed by conditions of approval (COAs) in 2 projects. This site-specific analysis tiers into and incorporates by reference the information and analysis in the Final Environmental Impact Statement and Proposed Plan Amendment for the Powder River Basin Oil and Gas Project (PRB FEIS), WY-070-02-065, 2003, the PRB FEIS Record of Decision (ROD), North Tree Phase 1 EA, WY-070-EA13-77, Spruce 2 Plan of Development (POD) EA, WY-070-EA13-240, Spruce 3 and 4 Categorical Exclusion 3 (CX3), WY-070-390CX3-14-67-78, and the Invasive Species Management –Buffalo Field Office EA, WY- 070-EA13-137 - per 40 CFR 1508.28 and 1502.21. One may review these documents at the BLM Buffalo Field Office (BFO) and on our website: http://www.blm.gov/wy/st/en/field_offices/Buffalo.html.

1.1. Background

SRC is developing deep horizontal wells in its North Tree Phase 1 project area. BLM approved the North Tree Phase I POD in March of 2013 and it included 18 wells on 8 pad locations. BLM imposed a standard condition of approval (COA) on the project to protect GSG during the breeding season because the project is within 2 miles of GSG leks. SRC proposes that BLM make an exception to the COA which will allow surface disturbance (drilling) from March 15 to June 30, 2014 at their Kansas pad in exchange for SRC's restoring or improving GSG habitat in priority habitats (core area). SRC coordinated with the WGFD to establish a robust methodology for ratios of impacts to mitigation prior to presenting the methodology to the Wyoming Greater Sage-Grouse Implementation Team (SGIT) on December 12, 2013. That presentation was well received and the SGIT found that the proposed methodology was sound.

Similarly, BLM approved DEP's Spruce 3 and 4 POD in February, 2013 and permitted 12 wells on 10 pad locations in that analysis area. DEP's approved wells also reside within 2 miles of GSG leks, resulting in a COA imposed to mitigate seasonal impacts to GSG nesting habitat. DEP coordinated with SRC and Buffalo BLM, using SRC's methodology for computing mitigation ratios, and then submitted an exception via sundry for the seasonal timing from March 15 to June 30, 2014 for DEP's IRF 214276-2FH pad in exchange for restoring and/or improving GSG habitat in priority habitats (core area).

BLM coordinated with SRC on this concept and project starting in January 2013. Since then, BLM and SRC met in person or by phone on nine occasions. DEP initiated discussions independently with BLM and SRC on February 7, 2014. DEP, SRC and BLM met to finalize the project proposal on February 14, 2014.

1.2. Need for the Proposed Action

BLM's need for this project is to determine whether, how, and under what conditions to support the Buffalo Resource Management Plan's (RMP) goals, objectives, and management actions (2003, 2011 Amendments) by allowing an exception to the timing restrictions for GSG for the 2014 breeding and nesting season. The Buffalo BLM also has a need for improving GSG habitat quality in priority habitats in order to continue to maintain population viability in the Powder River Basin (Taylor et al. 2012). This proposal meets the intent of BLM Instruction Memorandum IM-2012-019, p. 7, exceptions:

Instruction Memorandum No. WY-2012-019 **Exceptions to lease stipulations, Conditions of Approval (COAs), and terms and conditions (T&Cs), etc.** will continue to be considered on a case-by-case basis consistent with approved Resource Management Plans (RMPs) and other BLM policy and regulations as they relate to exceptions. ... When considering exceptions to timing, distance, disturbance and density restrictions applied to oil and gas activities, BLM WY FOs will coordinate with the WGFD in accordance with Appendix 5G of the Umbrella MOU (WGFD and USDI BLM 1990, as updated) and the coordination diagram for interactions between BLM WY and the WGFD specific to this IM (Attachment 4). All necessary timing, distance, disturbance and density restrictions will be considered across all FOs within appropriate NEPA compliance documentation for new projects under consideration. BLM WY FOs may vary somewhat in their application of these restrictions when that variance is based on locally collected scientific data and information, and such information is included in project-specific NEPA analysis (including analysis and rationale that support existing Records of Decision). Additionally, variance or determinations that do not apply the measures located in this policy IM may be necessary where BLM is required to comply with other non-discretionary statutes and regulations (*i.e.*, valid existing rights, oil and gas “drainage”, etc.).

Extensive locally collected scientific data collection in the Buffalo planning area demonstrates continued negative GSG population response in the PRB despite BLM’s application of RMP proscribed GSG-focused mitigation measures in fluid and solid mineral projects and permitted surface uses. These proposals are intended to benefit GSG populations in priority (core) habitats, an action supporting Wyoming and national GSG conservation goals.

1.3. Decision to be Made

The BLM will decide whether or not to approve the proposed GSG timing limitation exceptions at two pads, the proposed restoration or improvement of GSG priority (core) habitat, and if so, under what terms and conditions agreeing with the Bureau’s multiple use mandate, environmental protection, and RMP.

1.4. Scoping and Issues

BLM completed directed scoping of the proposal through SRC, DEP, the, WGFD, WY Office of State Lands and Investments, and Johnson County Weed and Pest. BLM will timely publish the EA, any finding, and decision on the BFO website. External scoping is unlikely to identify new substantial issues, as none were identified during or after the December 12, 2013 SGIT presentation.

The BFO interdisciplinary team (ID team) conducted internal scoping by reviewing the proposals, their locations, and a resource (issue) list (see administrative record (AR)), to identify potentially significantly affected resources, land uses, resource issues, regulations, and site-specific circumstances not addressed in the tiered analysis or other analyses incorporated by reference. This EA will not discuss resources and land uses that are not present, unlikely to receive significant or material affects, or that the PRB FEIS or other analyses (specifically North Tree Phase 1 EA, WY-070-EA13-77, Spruce 2 POD EA, WY-070-EA13-240, and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78, and Invasive Species Management – Buffalo Field Office WY- 070-EA13-137) adequately addressed. This EA addresses the project’s site-specific impacts of providing an exception to timing restrictions coupled with off-site mitigation that were not addressed in the APD approvals. The project and mitigation areas clearly lack wilderness characteristics as they have fewer than 5000 acres of federal surface.

2. PROPOSED PROJECT AND ALTERNATIVES

2.1. Alternative A – No Action

The no action alternative is disclosed in the authorizing documents listed above. The no action alternative would deny SRC’s and DEP’s requests for exception from surface disturbance restrictions from March 15

to June 30, 2014, and construction and drilling activities would cease at the Kansas Pad and the IRF 214276-2FH location during that time. Habitat enhancement efforts, on private lands, would not take place in the priority (core) habitat, and current infestation of invasive annual grasses would not be addressed.

2.2. Alternative B Proposed Action (Proposal)

SRC and DEP proposed that the COAs imposed on the Kansas and the IRF 214276-2FH Pads, respectively be excepted from GSG March 15 - June 30 timing limitations for 2014 because the North Tree and the Spruce 3 and 4 project areas are currently developed with existing oil/gas and uranium projects, and the economic impact on time-constrained drilling schedules.

Table 2.2. Pad, Well List and Mineral Ownership. Operators Proposals for the Associated Well Pads.

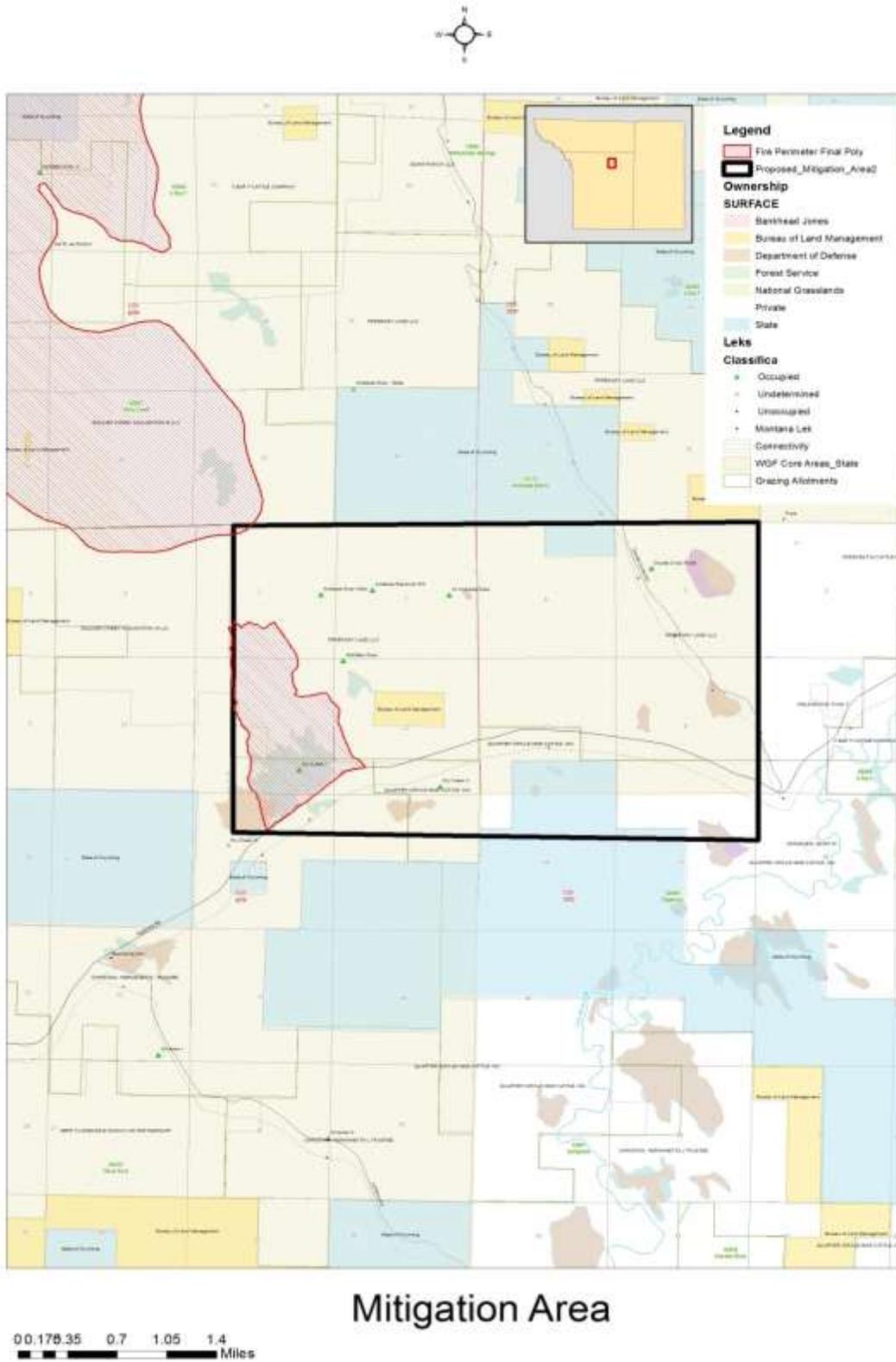
Pad Name	Well Name	Qtr	Sec	Twp	Rng	SHMO	LMO	BHMO
IRF 214276-2FH	IRF 214276-2FH	SESW	21	42	76	WYW147315	WYW147315	Fee
Kansas	TCR Kansas Fed 24-34 43-76BH	SWSW	27	43	76	WYW142081	WYW1445325	Fee
	TCR Nashville Fed 14-27 43-76H					WYW142081	WYW142081	

(SH) - surface hole, (L) - lateral, (BH) - bottom hole, (MO) - mineral ownership.

Rather than imposing March 15 to June 30, 2014 seasonal restrictions in an area experiencing oil and gas development, SRC and DEP proposed to implement habitat improvement projects in GSG priority habitat (core area).

The proposed off-site mitigation would occur on private, State and BLM controlled surface in Johnson County in a GSG core population area approximately 45 miles northwest of the Kansas and the IRF 214276-2FH Pads. Sampson originally proposed a single 1,400 acre treatment for cheatgrass in the 2012 Cato Fire. Devon proposed approximately 1,300 acres. The BLM, with operators’ agreement, modified the proposed mitigation as follows:

- 1) Moved the mitigation area from the 2012 Cato Fire south to the Fieldgrove Ranch (see map) in order to add value to the habitat improvement actions already under way on that ranch and in the Petrified Tree area south of Fieldgrove’s. See Map. BLM also recognized that the Cato Fire landowners are currently planning restoration activities, and that area is not ripe for treatment.
- 2) Reducing the treatment area to approximately 1400 acres, but doubling the number of treatments to address a potentially viable seed bank.
- 3) Monitoring the effectiveness of the treatment as follows.
 - a. Pretreatment inventory in 2014.
 - b. Post initial treatment
 - c. Post second treatment
 - d. 2-5 years after second treatment.



Map 1. Location of mitigation area.

2.3. Conformance to the Land Use Plan and Other Environmental Assessments

This proposal does not diverge from the goals and objectives in the Buffalo Resource Management Plan (RMP), 1985, 2001, 2003, 2011, and generally conforms to the terms and conditions of that land use plan, its amendments, supporting FEISs, 1985, 2003 and laws including the Clean Air Act, 42 USC 7401-7671q (2006), the Clean Water Act, 33 USC 1251 et seq. (1972), etc.

3. AFFECTED ENVIRONMENT

This section briefly describes the physical and regulatory environment that may be significantly affected by the alternatives in Section 2, or where changes in circumstances or regulations occurred since the approval of analyses to which this EA incorporates by reference; see Appendix 1. The PRB FEIS considered a no action alternative (pp. 2-54 to 2-62) in evaluating a development of up to 54,200 fluid mineral wells. The BLM uses the aggregated effects analysis approach - incorporating by reference the circumstances and developments approved via the subsequent NEPA analyses for overlapping and intermingled developments coincident to this proposal area to retain currency in the no action alternative. 615 F. 3d 1122 (9th Cir. 2010).

The affected environment for the well pads in question was addressed in the APD approvals: SRC's North Tree Phase 1 EA, WY-070-EA13-77, DEP's Spruce 2 POD EA, WY-070-EA13-240 and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78. The affected environment for the mitigation area is similar to those described in the Antelope Basin/Mark Gordon/Lawrence Land Co. grazing renewal EA, WY-070-EA13-221.

3.1. Soils, Ecological Sites, and Vegetation

Well Pads:

See the respective approval documents for a description of soils, ecological sites, and vegetation at the well pads: WY-070-EA13-77, Spruce 2 POD EA, WY-070-EA13-240, and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78

Mitigation Area:

The Fieldgrove Ranch has been active in GSG conservation. The ranch partners with the Lake DeSmet Conservation District and NRCS to control invasive plants, plant sage brush, mark fences, and manipulate grazing strategies.

3.2. Reclamation Suitability (Source Material)

Well Pads:

See the respective approval documents for a description of soils, ecological sites, and vegetation at the well pads: WY-070-EA13-77, Spruce 2 POD EA, WY-070-EA13-240, and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78

Mitigation Area:

Both well pad locations are situated in areas that are anticipated to have successful interim and final reclamation.

3.3. Fish and Wildlife

Wildlife habitat and impacts were analyzed in the NEPA documents referenced above for the corresponding well locations. In the proposed mitigation area wildlife resources are similar to those in the Antelope Basin/Mark Gordon/Lawrence Land Co. grazing renewal EA, WY-070-EA13-221.

3.4. Threatened, Endangered, Candidate, Special Status (Sensitive) Species

3.4.1. Candidate Species - Greater Sage-Grouse (GSG)

The PRB FEIS has a detailed discussion on GSG ecology and habitat, pp. 3-194 to 3-199. Subsequently the FWS determined the GSG warrants federal listing as threatened across its range, but precluded listing due to other higher priority listing actions, 75 Fed. Reg. 13910 to 14014, Mar. 23, 2010; 75 Fed. Reg. 69222 to 69294, Nov. 10, 2010. GSG are a WY BLM special status (sensitive) species (SSS) and a WGFD species of greatest conservation need because of population decline and ongoing habitat loss. The 2012 population viability analysis for the Northeast Wyoming GSG found there remains a viable population of GSG in the PRB (Taylor et al. 2012). However, threats from energy development and West Nile virus (WNV) are impacting future viability (Taylor et al. 2012). The BLM IM WY-2012-019 establishes interim management policies for proposed activities on BLM-administered lands, including federal mineral estate, until RMP updates are complete.

The proposed mitigation area is within the Buffalo GSG Core Population Area, and is considered priority habitat. The exception pad locations are not within BLM designated priority habitats for GSG. There are 17 occupied GSG leks within 4 miles of the proposed mitigation area. Five of these leks occur within 4 miles of the Kansas Pad, and 3 leks are within 4 miles of the IRF 214276-2FH Pad. All 5 of the leks within 4 miles of the Kansas Pad are categorized as extremely impacted by energy development, and the 3 leks near the IRF 214276-2FH receive moderate to extreme impacts.

The majority of the leks within 4 miles of the proposed mitigation area are categorized by the WGFD as either low or moderately impacted by energy development (see table 3.1).

GSG are sagebrush obligate species and each aspect of their life cycle requires slightly different elements within the sagebrush communities. Grass height and cover play an important role in the nesting success of GSG. Early brood rearing habitats consist of relatively open stands of sagebrush or narrow, shrub-free stringers of meadows in draws or other areas with abundant soil moisture that produce sufficient quantities of insects important to chick growth. During the summer months, GSG move to moderately moist sites seeking succulent forbs. During the winter months, GSG often congregate on wintering areas and feed almost exclusively on sagebrush leaves.

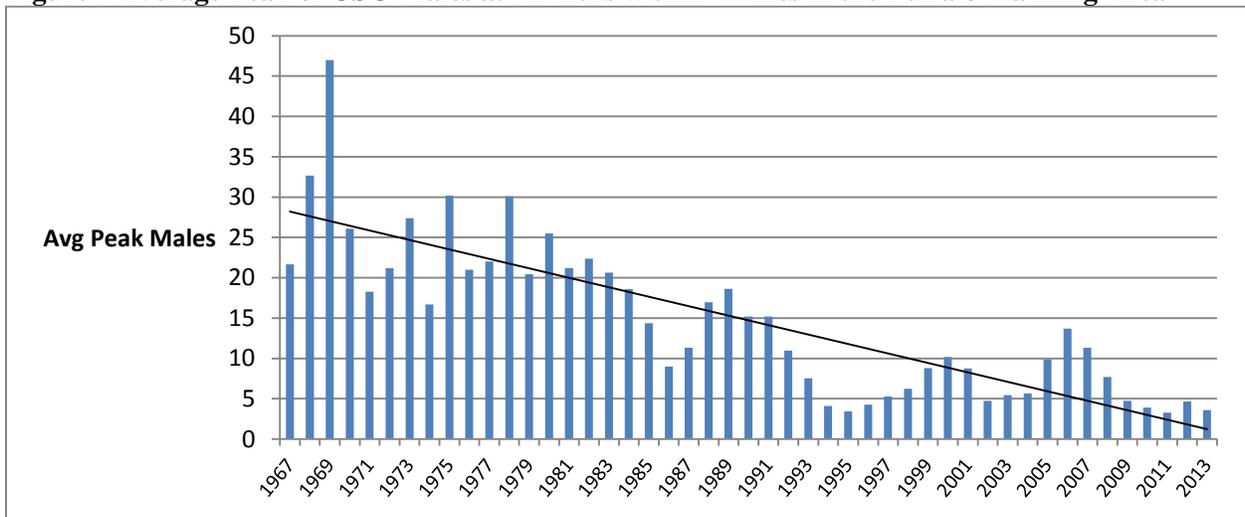
Table 3.1. WGFD Impact Category for Occupied GSG Leks Within 4 miles of the Proposal Areas

Lek Name ¹	Distance to Nearest Pad/Project (miles)	Number of Permitted and Producing Wells ¹		Density of Permitted and Producing Wells (wells per square mile)		WGFD Category of Impact
		2-mile buffer	4-mile buffer	2-mile buffer	4-mile buffer	
Kansas and IRF 214276-2FH Pad Area Leks						
Collins SE	3.89	24	150	2	3	High
Collins SW	2.37	12	135	1	3	Moderate
Cedar Canyon	1.6	74	210	6	4	Extreme
Collins North	3.9	35	180	3	4	Extreme
Cottonwood Creek 1	0.9	90	310	7	6	Extreme
Cottonwood Creek 2	2.1	88	284	7	6	Extreme
Cottonwood Creek 3	1.4	57	253	5	5	Extreme
Mitigation Area Leks						
41 Antelope Draw	Within	9	56	<1	1	Low
Antelope Draw-State	Within	0	16	0	<1	Low
Antelope Draw West	Within	4	34	<1	<1	Low
Antelope ReservoirNW	Within	6	46	<1	<1	Low
Christian I	1.6	1	28	<1	<1	Low
Christian II	2.3	16	43	1	<1	Moderate
Christian III	3.8	13	47	1	<1	Moderate
Double Cross Road	Within	22	86	2	2	High
Dry Creek I	Within	2	43	<1	<1	Low
Dry Creek II	Within	14	73	1	1	Moderate
Fleetwood Draw	3.1	31	196	3	4	High
Grub Draw	3.6	0	26	0	<1	Low
McMillan Draw	Within	6	45	<1	<1	Low
McMillan Draw I	3.0	0	0	0	0	Low
McMillan Draw II	3.9	0	0	0	0	Low
Sony Top	2.8	0	14	0	<1	Low
Stewart Draw	2.4	37	180	3	4	High

¹ Lek locations obtained from BLM 2013b. The locations of permitted and producing oil and gas wells were obtained from the WOGCC online database (WOGCC 2013b).

GSG populations have exhibited declines throughout the range over the past 30 to 40 years. The GSG population in northeast Wyoming is exhibiting a steady long-term downward trend, as measured by lek attendance (WGFD 2013). Figure 1 illustrates a 10-year cycle of periodic highs and lows. Each subsequent population peak is lower than the previous peak. Research suggests that the declines since 2001 are a result, in part, of energy development (USFWS 2010, Taylor et. al. 2012).

Figure 1 Average Peak of GSG Males at All Leks within 4 Miles in the Buffalo Planning Area



3.5. Big Game

The big game species occurring in the project area are mule deer, white-tailed deer and pronghorn. The PRB FEIS discussed the affected environment for pronghorn, mule deer and white-tailed deer on pp. 3-117 to 3-122, pp. 3-127 to 3-132, 3-122 to 3-127, and 3-132 to 3-140, respectively. Table 3.2 below indicates the delineated seasonal ranges for each species that occur in the project area, the herd units affected by the project, the WGFD population objective, and the WGFD current population estimate for each species (WGFD 2012).

Table 3.2 Big Game Species, Seasonal Ranges, Herd Units, Population Objectives, and Population Estimates for Big Game Species Likely to Occur in the Proposal Area

Species	Seasonal Range in Project Area	Herd Unit	WGFD Population Objective	% Above (+) or Below (-) Objective	WGFD Report Year
Proposed Mitigation Area					
Mule deer	Winter yearlong	319 – Powder River	52,000	- 32.1%	2012
Pronghorn	Yearlong	352 – Ucross	25,00	+ 196%	2012
White-tailed deer	Yearlong	303- Powder River Unit	8,000	+108%	2012

Yearlong use is when a population makes general use of suitable documented habitat sites within the range on a year-round basis, but animals may leave the area under severe conditions. Winter-yearlong use is when a population or a portion of a population of animals makes general use of the documented suitable habitat sites within this range on a year-round basis, but during the winter months there is a significant influx of additional animals into the area from other seasonal ranges.

3.6. Raptors

Neither the Kansas nor IRF 214276-2FH Pads had raptor timing restrictions recommended or applied. See Sampson North Tree Phase 1 EA, WY-070-EA13-77, Devon’s Spruce 2 POD EA, WY-070-EA13-240, and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78. Raptors use the proposed mitigation area for breeding, nesting, foraging, wintering, and migration. Common raptor species frequenting the area include golden and bald eagles, northern harrier, red-tailed hawk, Swainson’s hawk, American kestrel, short-eared owl, and great-horned owl. Bald eagles and rough-legged hawks winter in the EA area. Bald

eagles occasionally roost in cottonwoods galleries in nearby riparian areas in the winter and forage throughout the area.

3.6.1. Migratory Birds

Migratory birds in the pad locations were addressed in the APD approval documents. Several migratory species which are also BLM special status (sensitive) species are known or suspected to occur in the mitigation area including: Brewer's sparrow, ferruginous hawk, loggerhead shrike, long-billed curlew, mountain plover, sage sparrow, sage thrasher, and western burrowing owl.

4. ENVIRONMENTAL EFFECTS

No Action Alternative.

The no action alternative is disclosed in the North Tree Phase 1 EA, WY-070-EA13-77, Spruce 2 POD EA, WY-070-EA13-240, and Spruce 3 and 4 CX3, WY-070-390CX3-14-67-78. BLM incorporates by reference these analyses in this EA; see Appendix 1. The no action alternative would deny SRC's and DEP's requests for exception from surface disturbance restrictions from March 15 to June 30, 2014, and ongoing construction and drilling activities would cease at the Kansas Pad and the IRF 214276-2FH location during that time. Habitat enhancement efforts (cheatgrass treatment) would not take place in the priority (core) habitat, leaving the treatment area subject to increased density of cheatgrass and resultant threat from fire. .

Lengthened reclamation timelines may result from the intervals of inactivity imposed through the authorizations listed above, resulting in loss of soil viability.

Alternative B, Proposed Action

4.1. Soils, Ecological Sites, and Vegetation

The direct, indirect, cumulative, and residual effect to soils and vegetation from continuous drilling for the 2014 season will allow for the faster interim reclamation at the well pads. This should result in better top soil viability, decreased opportunities for weed establishment, and ultimately better final reclamation.

4.2. Invasive Species

The direct, indirect, cumulative, and residual effects of the applications of herbicide in the off-site mitigation area will have a beneficial impact to the native plant community by removing annual brome grasses from approximately 1,400 acres in priority habitat. The mitigation proposal will add value to the work already taking place at Fieldgrove's to benefit soils, ecological sites and vegetation.

4.3. Fish and Wildlife

The direct, indirect, cumulative, and residual effects of the impacts to wildlife from spraying cheat grass were analyzed in the Invasive Species Management –Buffalo Field Office WY- 070-EA13-137. In general, appropriate use of Plateau (imazapic) is considered to be a low risk to wildlife species. Wildlife other than Hungarian partridge (*Perdix perdix*), which evolved with cheatgrass, will be positively affected by the reduced competition from annual bromes and the decreased potential for wildfire. Effects on sensitive species were evaluated in the wildlife table found in the project record.

4.4. Threatened, Endangered, Proposed and Candidate Species

4.4.1. Threatened and Endangered Species

Ute Ladies'-tresses Orchid (ULT) is the only listed species requiring an effects determination (ESA Section 7 (2)). The proposed herbicide treatment will occur outside of the known species range in NE Wyoming and will occur on upland habitats. There will be no effect to ULT.

4.4.2. Candidate Species

4.4.2.1. Greater Sage-Grouse

Kansas and IRF 214276-2FH Well Locations

Existing well densities at and near the Kansas & IRF 214276-2FH well pads exceed the WGFD Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats (2009), categorized levels of oil and gas development thresholds into extreme impacts to habitat effectiveness for various species of wildlife, based on well pad densities and acreages of disturbance. This level of impact means that the function of an important wildlife habitat is substantially impaired or lost.

Construction and drilling activities during the breeding and nesting season associated with removal of the seasonal GSG timing restrictions will increase noise and human activity in the area. Research indicates that GSG avoid lekking and nesting in developed areas. Leks within the two mile protection buffers from the pads are classified by the WGFD being impacted by energy developments (Table 3.1). While timing restrictions may provide seasonal protections to GSG in less developed areas, in this case, there is little potential GSG would nest near either well pad locations. The contribution of impacts of the proposal to impacts already existing at the well locations is insignificant.

Proposed Mitigation Area

These habitat improvement projects will likely improve long-term viability of GSG populations in Northeastern Wyoming by increasing native plant diversity and decreasing the potential for catastrophic wildfire. The treatment of cheatgrass on approximately 1,400 acres in the GSG Buffalo Core population area will reduce competition for water, light and nutrients and increase the production of perennial grasses and forbs. This should improve conditions for GSG because they rely on perennial grasses for escape cover and residual herbaceous cover for screening cover in nesting habitat. Native forbs are positively associated with survival and herbaceous cover for screening cover in nesting habitat. Native forbs are positively associated with survival and recruitment GSG chicks. Cheatgrass control will also reduce the combustible fuel load in GSG habitat and may reduce the potential for sagebrush stand replacing fires.

4.4.2.2. Cumulative Effects

The 2012 population viability analysis for the NE Wyoming GSG found there remains a viable population of GSG in the PRB (Taylor et al. 2012). Threats from energy development and West Nile Virus (WNV) are impacting future viability (Taylor et al. 2012). The study indicated that effects from energy development, as measured by male lek attendance, are discernible out to a distance of 12.4 miles.

Declines in lek attendance associated with oil and gas development may be a result of a suite of factors including avoidance (Holloran et al. 2005, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al. 2007, Doherty et al. 2008, WGFD 2009), loss and fragmentation of habitat (Connelly et al. 2000, Braun et al. 2002, Connelly et al. 2004, WGFD 2004, WGFD 2005, Naugle et al. 2011), reductions in habitat quality (Braun et al. 2002, WGFD 2003, Connelly et al. 2004, Holloran et al. 2005) and changes in disease mechanisms (Naugle et al. 2004, WGFD 2004, Walker et al. 2007.).

Studies document the additive impacts of energy development and WNV as a threat to GSG persistence in the PRB (Taylor et al. 2012, Garton et al. 2011). The cumulative and synergistic effects of CBNG development and WNV in the PRB area will continue to impact the local GSG population, causing further declines in lek attendance, and could result in local extirpation: “[f]indings reflect the status of a small remaining sage-grouse population that has already experienced an 82% decline within the expansive energy fields.” (Taylor et al. 2012). Current well densities reduce the effectiveness of PRB core areas (Taylor et al. 2012). Continued energy development around the core areas will reduce PRB core areas remaining value. WNV outbreaks combined with energy development reduce GSG populations and interact to exacerbate population declines. The effects of one WNV outbreak year could cut a population

in half. Absent a WNV outbreak, or another stochastic event of similar magnitude, immediate extirpation is unlikely. Results suggest that if current oil and gas development rates continue, they may compromise future viability of NE Wyoming GSG, with an increased chance of extirpation with additional WNV outbreaks (Taylor et al. 2012).

4.4.2.3. Mitigation Measures/ Residual Effects

There are no mitigation measures or residual effects for this proposal.

4.4.2.4. Migratory Birds

The PRB FEIS discussed direct and indirect effects to migratory birds on pp. 4-231 to 4-235. Migratory bird species nest in the spring and summer and are vulnerable to the same effects from energy development as GSG and raptors. Where GSG or raptor nesting timing limitations are applied, nesting migratory birds are collaterally protected. Where these timing limitations are not applied, as is the case here, migratory birds remain vulnerable to impacts. The DEP IRF 214276-2FH Pad approval was conditioned with a prohibition for removing identified sagebrush obligate migratory bird habitat. The operator may remove (mow) the habitat prior to May 1 or after July 31. If the habitat will be removed during that time frame, a clearance survey will be required. Removal of the GSG timing restriction does not remove this restriction.

If surface and/or disruptive activities associated with the exceptions were to occur at the two pad locations prior to May 1st, migratory birds are likely to avoid initiating nests within suitable habitats immediately adjacent to the pad locations.

Removal of cheatgrass will benefit native plants and therefore benefit migratory birds that evolved with those plants and rely on them for food, cover and nesting. Herbicidal treatment with Plateau may have a low risk of toxicity to birds ingesting insects in the treatment area.

4.4.2.5. Cumulative Effects

The cumulative effects are within the analysis parameters and impacts described in the PRB FEIS. For details on expected cumulative impacts, refer to the PRB FEIS, p. 4-235. Cumulative effects from serial application of cheatgrass in the PRB GSG population priority habitats should have a beneficial impact to migratory birds, particularly sagebrush obligates, through increased native plant density and diversity as well as increased habitat resilience to fire.

4.4.2.6. Mitigation Measures / Residual Effects

None identified.

4.4.3. Big Game

4.4.3.1. Direct and Indirect Effects

Kansas and IRF 214276-2FH Well Locations

Big game will not be receiving the incidental protection that they would have under the GSG timing restrictions and will likely be displaced from the project area during drilling and construction. Energy development activities that occur within big game habitats during the spring will likely displace adult females and juveniles due to the human presence in the area. This may cause reduced survival rate of individuals that must expend increased energies to avoid such activities. The APDs approvals did not contain conditions of approval or mitigation for big game. The well pads are not in crucial winter or identified birthing areas.

Proposed Mitigation Area

The reduction of cheatgrass will increase the production and quality of forage for deer and pronghorn. Applications usually occur in the fall, which will avoid birthing season.

4.4.3.2. Cumulative Effects

The cumulative effects are within the analysis parameters and impacts described in the PRB FEIS. For details on expected cumulative impacts, refer to the PRB FEIS, p. 4-181 to 4-215. Cumulative effects from serial application of cheatgrass in the PRB GSG population priority habitats should have a beneficial impact to big game through increased native plant density and diversity as well as increased habitat resilience to fire.

4.4.3.3. Mitigation Measures/ Residual Effects

None identified.

4.4.4. Raptors

4.4.4.1. Direct and Indirect Effects

Kansas and IRF 214276-2FH Well Locations

There will be no impact by the proposal to nesting raptors. The pad locations did not have raptor timing restrictions applied as a condition of approval.

Proposed Mitigation Area

Herbicidal treatment with Plateau may have a low risk of toxicity to birds ingesting insects in the treatment area. The change in vegetation will affect species differently. Birds that prefer short vegetation may be affected negatively where many species will benefit from the increased cover provided by native perennial grasses.

4.4.4.2. Cumulative Effects

The cumulative effects are within the analysis parameters and impacts described in the PRB FEIS. For details on expected cumulative impacts, refer to the PRB FEIS, p. 4-221 and p. 4-235.

4.4.4.3. Mitigation Measures/Residual Effects

There are no mitigation measures or residual effects for this proposal.

5. CONSULTATION/COORDINATION:

BLM Consulted or Coordinated with the Following on this Analysis

Contact	Organization	Contact	Organization
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6. References and Authorities

- Aldridge, C. L., and M. S. Boyce. 2007. Linking occurrence and fitness to persistence: a habitat-based approach for endangered greater sage-grouse. *Ecological Applications* 17:508-526.
- Braun, C.E., O.O. Oedekoven, and C.L. Aldridge. 2002. Oil and Gas Development in Western North America: Effects on Sagebrush Steppe Avifauna with Particular Emphasis on Sage Grouse. In: Transactions of the 67th North American Wildlife and Natural Resources Conference. pp337-349.
- Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. E. Braun. 2000. Guidelines for management of sage grouse populations and habitats. *Wildlife Society Bulletin* 28:967-985.
- Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats. Western Association of Fish and Wildlife Agencies. Unpublished Report. Cheyenne, Wyoming.
- Doherty KE, Naugle, Copeland, Powcewicz, Keisecker. 2011 Energy Development and Conservation Trade-offs: systematic planning for Greater Sage-Grouse in their eastern range. Chapter 21 in Knick and Connolly; Greater Sage-Grouse Ecology and Conservation of a Landscape Species and its Habitats. *Studies in Avian Biology* No. 38. University of California Press
- Doherty, K.E., D.E. Naugle, B.L. Walker, J.M. Graham. 2008. Greater sage-grouse winter habitat selection and energy development. *Journal of Wildlife Management* 72:187-195.
- Garton, E.O., J.W. Connelly, C.A. Hagen, J.S. Horne, A. Moser, and M.A. Schroeder. 2011. Greater Sage-grouse Population Dynamics and Probability of Persistence. Pages 293-381 in Greater sage-grouse: ecology and conservation of a landscape species and its habitats, S. T. Knick, J. W. Connelly, C. E. Braun (editors). *Studies in Avian Biology*, Number 38, University of California Press, Berkeley, CA, USA.
- Holloran, M J.; B. J. Heath; A. G. Lyon; S. J. Slater; J. L. Kuppiers; and S. H. Anderson. 2005. Greater sage-grouse nesting habitat selection and success in Wyoming. *J. Wildl. Manage.* 69(2):638-649.
- Holloran, M. J., R. C. Kaiser, and W. A. Hubert. 2007. Population Response of yearling greater sage-grouse to the infrastructure of natural gas fields in southwestern Wyoming. Completion report. Wyoming Cooperative Fish and Wildlife Research Unit, Laramie, WY, USA. 34pp.
- Naugle, D. E. K. E. Doherty, B. L. Walker, M. J. Holloran, and H. E. Copeland. 2011. Energy Development and Greater Sage-Grouse. Pp. 489-529 in Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats, S. T. Knick, J. W. Connelly, C. E. Braun (eds.) *Studies in Avian Biology*, Number 38, University of California Press, Berkeley.
- Naugle, D. E.; C. L. Aldridge; B. L. Walker; T. E. Cornish; B. J. Moynahan; M. J. Holloran; K. Brown; G. D. Johnson; E. T. Schmidtman; R. T. Mayer; C. Y. Kato; M. R. Matchett; T. J. Christiansen; W. E. Cook; T. Creekmore; R. D. Falise; E. T. Rinkes; and M. S. Boyce. 2004. West Nile virus: Pending Crisis of Greater Sage-grouse. *Ecology Letters*. 7:704-713.
- Taylor, R. L., D. E. Naugle, L. S. Mills. 2012. Viability analyses for conservation of sage-grouse populations: Buffalo Field Office, Wyoming. Final Report. February 27, 2012. University of Montana, Missoula, MT.
- U.S. Department of the Interior, Fish and Wildlife Service (FWS). 2010. Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to List the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered. 50 CFR Part 17.
- Walker, B.L., D. E. Naugle, and K.E. Doherty. 2007. Greater sage-grouse population response to energy development and habitat loss. *Journal of Wildlife Management* 71:2644-2654.
- Walker, B. L., D. E. Naugle, K. E. Doherty, and T. E. Cornish. 2007. West Nile virus and greater sage-grouse; estimating infection rate in a wild bird population. *Avian Diseases* 51:691-696.
- WGFD. 2013. 2013 Sheridan Region Lek Monitoring Results.
- WGFD. 2012. Sheridan Region Annual Big Game Herd Unit Reports. WGFD. Cheyenne, WY.
- WGFD. 2009. Minimum Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats on BLM Lands. WGFD. Cheyenne, WY.
- WGFD. 2005. Northeast Wyoming Local Working Group Area: Annual Sage-Grouse Completion Report for 2005. Wyoming Game and Fish Department. Buffalo, WY. 42pp.
- Wyoming Game and Fish Department (WGFD). 2004. Minimum Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats on BLM Lands. WGFD. Cheyenne, WY.
- WGFD. 2003. Wyoming Greater Sage-Grouse Conservation Plan. WGFD. Cheyenne, WY.
- Wyoming Oil and Gas Conservation Commission. 2013. Well Files, <http://wogcc.state.wy.us/> .

Appendix 1. NEPA Analyses and a Study Incorporated in EA, WY-070-EA14-91 by Reference

NEPA Analyses Intermingled with Kansas & IRF 214276-2FH Pads, Incorporated by Reference

#	Project Name / #	NEPA Analysis #	# / Type Wells	Decision Date
1	SRC North Tree Phase 1	WY-070-EA13-77	18 / oil	3/26/2013
2	APC Dry Willow Phase 5	WY-070-10-186	27 CBNG	8/12/2010
3	DEP West Pine Tree-Brook Trout	WY-070-EA08-129	50 CBNG	9/17/2008
4	DEP Grayling	WY-070-EA10-332	80 CBNG	3/1/2011
5	DEP Pine Tree Kokanee	WY-070-EA06-114	35 CBNG	
6	WPX Tex Draw	WY-070-08-125	61 CBNG	8/8/2008
7	Dry Willow Phase 2	WY-070-07-148	43 CBNG	6/26/2007
8	DEP Spruce 3 & 4	WY-070-390CX3-14-67-78	12 / oil	2/6/2014

NEPA Analyses Intermingled with Kansas & IRF 214276-2FH Pads, Incorporated by Reference

#	Project Name	NEPA Analysis #	# AUMs / Management Status	Decision Date
1	Dry Willow (T Chair)	WY-070-EA02-168 Appropriations Act*	462 AUMs / Custodial*	4/5/2002 9/18/2012
2	Linch	WY-070-EA02-072 Appropriations Act	173 AUMs / Custodial	1/3/2002 2/10/2012
3	Dry Fork	WY-070-EA02-144	488 AUMs / Custodial	3/12/2002

BLM has no oil or gas site specific NEPA analysis overlapping or adjacent to the Alternative B area.

NEPA Analyses Intermingled with Proposed Off-Site Mitigation Area, Incorporated by Reference

#	Project Name	NEPA Analysis #	# AUMs /Management Status	Decision Date
1	Clear Creek	WY-070-EA04-085	39 AUMs/Custodial	8/4/2004
2	Lawrence Land Company	WY-070-EA13-221	19 AUMs/Custodial	8/29/2013
3	Antelope Basin/Mark Gordon	WY-070-EA13-221	47 AUMs/Custodial	8/29/2013
4	Rattlesnake Springs	WY-070-EA07-040	46 AUMs/Custodial	12/7/2006

*Appropriations Act-Riders attached to various appropriations acts over the last 5 years direct the BLM to renew grazing on allotment under the existing terms and conditions as the previous lease for up to 10 years. The existing terms and conditions were analyzed in the previous EAs.

*Custodial- grazing management category meaning the management is minimal; see Buffalo RMP ROD, pp. 10-12.

*Maintain- grazing management category to maintain existing conditions and management; see Buffalo RMP ROD, pp. 10-12.

*Improve- grazing management category to improve existing conditions and management; see Buffalo RMP ROD, pp. 10-12.

Cato Fire Emergency Stabilization and Rehabilitation (ES&R) Treatments, WY-070-DNA12-212, September 5, 2012

Dry Creek Petrified Tree Fire Rehabilitation, WY-070-DNA-11-212, April 20, 2011

Invasive Species Management Environmental Assessment (EA), WY-070-EA13-137, September 5, 2013

The following BLM funded study on GSG population viability in the Powder River Basin area is incorporated by reference in EA, WY-070-EA14-91: Taylor, R. L., D. E. Naugle, L. S. Mills. 2012. Viability analyses for conservation of sage-grouse populations: Buffalo Field Office, Wyoming. Final Report. February 27, 2012. University of Montana, Missoula, MT.