



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
RAWLINS FIELD OFFICE

TIERED EA, FONSI, AND DR FORM

Tiered to and Referencing the Atlantic Rim Natural Gas Development Project Environmental Impact Statement

ENVIRONMENTAL ASSESSMENT

EA NUMBER: WY-030-08-EA-240

Lease Numbers: Federal Leases WYW-137692 & 154149, and Fee Leases, within the Doty Mountain Unit POD C.

Proposed Action: Doty Mountain Unit Plan of Development (POD) C which includes: 5 Coal Bed Natural Gas (CBNG) Wells and 1 Produced Water Injection Well on 6 Federal Well Locations along with Access Roads and Pipeline/Utility Corridors, and 1 Fee Well Access Road and Utility Corridor on Federal Surface, with associated pipelines, power lines, produced water distribution lines and other related infrastructure, all within the Unit.

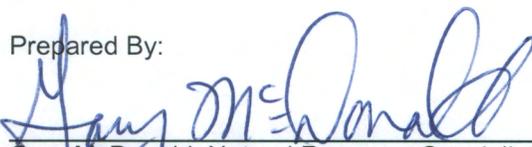
Location: Section 12, Township 17 North, Range 91 West, Carbon County, Wyoming

Applicant/Proponent: Anadarko E & P Company, L.P.

BLM Rawlins Field Office (RFO) Interdisciplinary (Review) Team (IDT)

IDT Members	Title
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Prepared By:



Gary McDonald, Natural Resource Specialist
Doty Mountain Unit POD C IDT Lead

9-3-2008
Date

Location of Wells and Proposed Action:

Lease Number	Well Name	Location
WYW-137692	AR Federal 1791 3-12	NENW 12-17N-91W
	AR Federal 1791 5-12	SWNW 12-17N-91W
	AR Federal 1791 7-12	SWNE 12-17N-91W
	AR Federal 1791 9-12 ¹	NESE 12-17N-91W
	AR Federal 1791 15-12	SWSE 12-17N-91W
WYW-154149	AR Federal 1791 13-12	SWSW 12-17N-91W
Fee ² (Access)	AR Fee 1791 13-1 ²	SESE 2-17N-91W

1 "i" indicates an injection well, rather than a producing well, that is located within the POD for the re-injection of produced water from POD CBNG wells listed in the table above

2 "Fee" indicates a well with private mineral ownership located on private surface. Although associated with the Unit, BLM has no direct jurisdiction over this well or the private surface involved. Thus this well is not being approved or denied with the POD. As it is within the Doty Mountain (Federal) Unit (CBNG), and also subject to the overall Atlantic Rim EIS surface disturbance cap as described in the "Remarks" section below, it is included for reference only. However, a 200 linear feet access road/utility corridor across federal lands in Section 2 (between Fee Sections 11 and 1) to the fee well (in Section 1) in the above table, all within the Unit, is being analyzed and approved as a part of the POD.

Also see POD Master Surface Use Plan with Plats, Plans and Maps.

Conformance with Land Use Plan

This proposed action is in conformance with the Great Divide Resource Management Plan (RMP) that was approved on November 8, 1990. The RMP has been reviewed to determine if the proposed action conforms to the land use plan terms and conditions as required by 43 CFR 1610.5. Development of oil and gas reserves is in conformance with the RMP. On page 30, the RMP states "The entire planning area [Great Divide Resource Area] is open to oil and gas leasing".

The development of this project will not affect the achievement of the Wyoming Standards for Healthy Rangelands (August 1997).

Remarks

The APD for the proposed actions were posted for 30 days (beginning 12/31/2007) in the Rawlins Field Office Information Access Center (Public Room) for review. Notification of preparation of this EA was provided on the Wyoming BLM internet NEPA register (<http://www.wy.blm.gov/nepa/search>).

The Atlantic Rim Area Natural Gas Field Development Project Environmental Impact Statement (AREIS) was written to assess the potential foreseeable and cumulative effects of drilling operations and associated activities in the Project area. The Record of Decision (ROD) for this project was approved on March 23, 2007. The proposed action is in conformance with the AREIS.

The AREIS ROD provides for the drilling of natural gas wells and associated infrastructure, limiting total surface disturbance to 7,600 acres at any one time (not including surface disturbance that occurred prior to implementation of the Interim Drilling Policy). The ROD establishes a per-well surface disturbance goal of 6.5 acres for short-term disturbance, except in the "Category A" areas identified in the ROD. The Category A areas require less than 6.5 acres of surface disturbance.

The surface disturbance cap is allocated to operators "...on a prorated mineral leasehold basis." (AR ROD, Page 2), and development is limited to no more than 8 well sites per 640-acre section. If in the event an Operator reaches the surface disturbance cap allocation, then "...further disturbance on federal minerals will not be permitted." (AR ROD, Page 3). The RFO will monitor and track disturbance areas for future proposals, in order to ascertain whether the disturbance cap would be exceeded by any future authorizations.

Note: One fee minerals/fee surface well located in Doty POD C is subject to the overall project disturbance cap, and is therefore included in the disturbance table within this document. However, as BLM has no jurisdiction over development of non-federal actions, these fee APDs are neither being approved or denied herein.

Where applicable, associated access to fee wells across BLM administered surface is included within the analysis, and is included in the Decision Record for the project.

The APD's, Master Drilling Plan and Master Surface Use Plan with Water Management Plan and Conditions of Approval, contain a complete description of the proposed action. The Master Drilling and Surface Use Plans with associated documents and the Conditions of Approval are considered an integral part of this Environmental Assessment and are incorporated by reference.

Modifications, or alternatives, to the original proposal received from the operator were identified as the result of the pre-approval onsite inspections. At the on-sites, all areas of proposed surface disturbance were inspected to ensure that potential impacts to resources would be reduced. In some cases, access roads were re-routed, and well locations, pipelines, and other water management control structures were moved, modified, or dropped from further consideration to alleviate or reduce environmental impacts. In addition, site specific mitigation and/or Conditions of Approval have been applied to alleviate or reduce environmental effects of the operator's proposal. Onsite changes, implementation of committed mitigation measures contained in the Master Surface Use Plan, Drilling Program and Water Management Plan, and site specific and Standard COAs are incorporated and analyzed in the Proposed Action Alternative.

All proposed POD C wells and locations including proposed access roads/corridors are located entirely within a Federal Oil and Gas Unit, the Doty Mountain Unit, and as a result, no additional rights-of-way are required. In addition to the proposed federal POD C wells and access road/utility corridors, Anadarko has requested access across federal land in order to access the AR Federal 13-1 Fee Well located on private (fee) surface and minerals, in the SWSW Section 1, T17N, R91W, of the Doty Mountain Unit and POD C. As this is an area of checkerboard land and mineral ownership, access to Section 1 from existing development must cross federal land. The route selected represents the least new disturbance and minimal disturbance on federal land. The route requires 200 linear feet of access road/utility corridor across (in) the corner of BLM federal surface in Section 2. It will be approved as a part of the approved POD. Should an actual Right-of-Way (ROW) be needed in the future related to the POD and development, it may be issued via a ROW Grant or an amendment to an existing Grant. The grant would be made under the authority of Title V of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1761), and be subject to the terms and conditions in 43 CFR 2801 and rental payments as determined by 43 CFR 2803.1-2. The grant would be subject to the mitigation set forth in the application/plan of development as found in the Surface Use Plan and APDs for these wells.

Purpose and Need for Proposed Action

Domestic natural gas production is an integral part of U.S. energy development and conservation plans due to its availability and the presence of existing market delivery infrastructure. Domestic production reduces immediate dependence upon foreign sources of energy, and maintains an adequate and stable supply of fuel to maintain economic well-being, industrial production, and national security. The environmental advantages of burning natural gas are emphasized in the Clean Air Act amendments of 1990.

In addition, the proposed action would allow Anadarko, as leaseholder, to exercise lease rights to explore and develop oil and gas resources within the project lease areas.

For these particular wells, the production is primarily natural gas and produced water from coal seams.

Development of Alternatives

In reviewing the proponent's submitted proposal (APDs, Master Surface Use Plan, Master Drilling Plan, Water Management Plan, etc.), the BLM conducted onsite reviews and considered known and potentially-occurring resources and conditions in the project area. As a result of this review, project components were moved, added, or eliminated in order to reduce potential environmental impacts, and in accordance with BLM policy and accepted Best Management Practices (BMPs). This resulted in the alteration of the proponent's submitted proposal to yield the Proposed Action, which incorporates the changes from the onsite inspections, BLM review, and mandated BLM mitigations (Conditions of Approval). The Proposed Action, then, differs from the original proposal submitted by the proponent. Since the proponent has agreed, by re-submission of the applications and POD plans, to the changes agreed upon as a result of the onsite inspections and BLM review, the Proposed Action represents a *de facto* alternative to the original submittal.

The AREIS considered several alternatives to development of the oil & gas resources in the project area (see DEIS, Pages S2-S3 and FEIS Page 1-20).

The site-specific NEPA contained herein is issue-driven and encompasses information found during on-site inspections and supporting documentation submitted by the operator in their Master Surface Use Plan, the Water Management Plan (WMP), and Master Drilling Plan and by BLM specialists. If particular resources did not exist in the project area, or in the area identified as the cumulative impact analysis area, they are not analyzed or discussed in this EA (40 CFR 1500.1(b), 1502.20 & 1508.28).

The BLM interdisciplinary team, in review of this Proposed Action (as modified during onsite inspections and subsequent review), identified no unresolved resource conflicts that would necessitate development of additional alternatives.

Description of Proposed Action Alternative

The proposed action includes the construction and/or reconstruction of access roads and the construction of well pads for the purpose of drilling 5 CBNG wells and 1 produced water re-injection well. It also includes the construction of an access road and utility corridor across fee and federal surface to access a fee well within the POD. It also includes the construction, installation, operation, maintenance and reclamation of associated underground gas gathering/sales pipelines, produced water-gathering/distribution pipelines and re-injection well sump, power-lines and utility corridors. The maps and illustrations attached to the APDs and Master Surface Use Plan display the locations of the proposed wells, access roads, gas and water-gathering pipelines, power-line (electrical) and other utility (gas and water) corridors. To minimize surface disturbance, the pipeline/utility corridors are located adjacent and parallel to the proposed or existing access roads and existing pipeline disturbances, except where not feasible or applicable or surface disturbance and or habitat/resources loss would be increased.

Any additional wells/facilities later determined to be necessary would be proposed and applied for via an APD and or Sundry Notice, and analyzed via a 390CX or site specific EA Tiered to this EA and the AR EIS, whichever applicable.

Water for drilling each well would be obtained from existing wells completed in the coal seams of the Mesa Verde Group within the Doty Mountain Unit. Water would be hauled by truck to each drill site over existing and proposed roads within the POD. Any changes in the water source or method of transportation would first require written approval by the BLM. To protect any shallow, fresh water aquifers or sources, drilling of surface casing for each well would use either air drilling techniques, or use non-produced (fresh) water from a State permitted local source.

Field onsite inspections of the POD wells, well pads, access roads and pipeline/utility corridors were initiated on May 5, 2008. Potential impacts to resources from the location of the well pads, access roads and corridors were reviewed and assessed. As a result, most pads, roads and corridors were relocated to reduce potential impacts to soils, vegetation, water, wildlife (including fisheries), cultural and recreational resources. Subsequent onsite inspections were conducted by the various resource specialists for further assessment of the well locations, access roads and corridors and their relocation. The main access road and one well pad and access road and associated corridors were relocated outside the one-quarter mile controlled surface use buffer of a greater sage-grouse lek, which was discovered during the initial onsite inspection. Several well pads and access roads/corridors were slightly moved and relocated to minimize habitat loss and resource impact and avoid drainages.

The location of the proposed development is approximately 26 miles north of Baggs, Wyoming and east of State Highway 789. Access to the area will be from existing County Road 608 to the east off of Highway 789. County Road 608 extends east into the Atlantic Rim CBNG development area. Existing roads across federal and private surface within the Doty Mountain Unit will be utilized to access POD C. The majority of the new access roads will be reconstructed existing two-track roads with some new constructed access roads to the POD well locations.

A discussion of the actions generally associated with drilling a well, including (1) a plan of operations, (2) construction of the access road and drilling pad, and (3) pipeline installation, can be located in the following portions of the AREIS or ROD:

- Chapter 2, Proposed Action and Alternatives (AREIS)
- Chapter 4, Analysis of Environmental Consequences (AREIS)
- Appendix A, Project Reclamation Plan (ROD)
- Appendix C, Operator-Committed Practices (ROD)

Mitigation and reclamation measures are described in Chapter 4 and Appendix B of the ROD (Project Performance-Based Monitoring and Best Management Practices). The following narratives summarize elements specific to the proposed action for this EA.

Construction

Well access roads, drill pads and pipeline/utility corridors must be constructed and or re-constructed in order to drill and complete operating and producing coal bed natural gas wells. This is considered a short-term disturbance. Upon completion of a well as a producer and placing into production (gas sales), portions of the well (drill) pad not needed for production operations will be reclaimed to a production pad. Upon the completion of installation of the pipelines/utilities, the pipeline/utility corridors will be fully reclaimed. Upon successful interim reclamation of the areas of the well pad and access/utility corridors not needed for production operations, the remaining surface disturbance is considered as long-term. The entire well pad, access road and pipeline/utility corridor will be totally reclaimed subsequent to well plugging and abandonment under final reclamation.

Overall short-term surface disturbance estimates for Doty Mountain POD C including the well pads and access road/utility/pipeline corridors are presented in the Table below (includes 1 fee well and access):

Short Term Disturbance Areas						
Well #	Well-pad (Acres ¹)	Access Road (Linear Feet)	Road (Acres ²)	Corridor (Linear Feet)	Corridor (Acres ³)	Sum-Total (Acres)
3-12	2.3	4317	5.0	4340	3.0	10.3
5-12	2.0	1711	2.0	1728	1.2	5.2
7-12	2.2	138	0.2	150	0.1	2.5
9-12i	2.9	1905	2.2	1888	1.3	6.4
13-12	2.3	676	0.8	731	0.5	3.6
15-12	2.0	4435	5.1	4425	3.1	10.2
13-1(i) ⁴	2.9	1900	2.2	1900	1.4	6.5
Total	16.6	15082	17.5	15162	10.6	44.7

1 Well pad surface disturbance areas are approximate and include spoil piles and cut/fill slopes.

2 Access road disturbance numbers assumes new road surface disturbance with widths equal to 50 feet.

3 Corridor assumes an additional corridor surface disturbance with widths equal to 30 feet.

4 The total surface disturbance associated with the fee well location is included for purposes of surface disturbance calculations and the "disturbance cap" only, however the 200 linear feet of access road/utility corridor across federal land is being approved and analyzed as part of the POD.

The proposed action will result in approximately 44.7 acres of short-term disturbance, comprised of new or reconstructed access roads and adjacent and parallel pipelines and utilities, as detailed above. The per-location average for the total short-term surface disturbance for well pad, access road and corridor in POD C is 6.4 acres. The majority of the proposed action is located outside of the identified "Category A" area, and thus is subject to a "surface disturbance goal" of 6.5 acres per well location. The northern most portion of the POD (13-1 Fee Well Location and Access Road) is within the "Category A" area requiring less than 6.5 acres of surface disturbance. The Doty Mountain POD C does meet the surface disturbance goals provided in the AREIS ROD.

Access

The operator proposes to re-construct existing and construct new access roads to the proposed well locations. The reconstructed and new constructed roads are to be constructed to meet BLM specifications for a "Resource Road", as specified in BLM Manual Section 9113. Proper drainage structures will be constructed/installed along the access roads. The width of the access road travel-way (travel surface) will be a minimum of 14 feet within an average right-of-way width of 40 to 50 feet. Unless prohibited by terrain and or excessive surface disturbance or other such circumstances, the access road right-of-way will be combined with the pipeline/utility right-of-way into a road/utility corridor that will be a total of 80 feet or less in width. Some local connector or collector roads between multiple well locations may be constructed to a minimum 16-20 feet wide travel width within the 80 feet wide corridor.

The access roads, including utility corridors, would be reclaimed during production operations to the maintenance width of approximately 30 to 40 feet. Utility corridors upon completion of pipeline/power-line installation along with any unneeded access road would be recontoured, ripped, seeded, and re-vegetated with approved native plants.

As provided for in the Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development, The Gold Book, Fifth Edition-2007 (containing BLM guidance for consideration of oil & gas activities on BLM-

administered public lands), "The appropriateness of primitive roads or routes is both site-specific and use specific and is typically based on many factors....". Non-constructed (primitive) roads were not mandated for the POD due to the lack of unresolved resource conflicts, the scope and type of construction/drilling equipment necessary, the necessity of year round access, and equipment operator safety. Should the BLM determine that alternate road designs are appropriate or necessary; the BLM could mandate the use of a reviewed and approved alternate design. In this instance, such a design was not determined to be necessary.

Well Sites

In order to drill and complete the wells, a drill pad will be constructed for each well location. The average size of the well pads is 2.4 acres, or approximately 360 feet X 280 feet. Well locations for produced water injection wells, identified by the letter "i" at the end of the well number, require a slightly larger well pad. In the event the wells become producers, cut and fill portions of the well site will be brought back to grade and reclaimed along with any other unneeded portions of the well site. Soil stockpiles will be re-spread or stabilized, and reseeded with native vegetation. The well pad will be reduced to less than one-half acre for the duration of production operations (the MSUP estimates the average size of the production pad at 0.32 acres). Unless otherwise authorized and in conjunction with interim pad reclamation, the reserve pits will have been dried and backfilled within 180 days (six months) of well completion, or plugging and abandonment. The entire well pad will be recontoured, ripped, seeded, and revegetated during final reclamation upon final plugging and abandonment.

Pipeline/Utility Corridors

The produced water and gas sales and gathering pipelines and power-lines would be buried upon completion of construction and installation, and the surface disturbed areas reclaimed soon thereafter. Upon well plugging and abandonment and or pipeline/power-line abandonment, the pipelines/power-lines would be properly abandoned in accordance with BLM procedures for abandonment and the right-of-ways and corridors adequately reclaimed. Major crossings of drainages have been engineered to insure design/construction adequacy and erosion protection. All channel crossings will comply with current BLM policies and mitigation measures appropriate to the crossings (see "Hydraulic Considerations for Pipelines Crossing Stream Channels," BLM Technical Note 423, April 2007).

Produced Water Disposal

Produced water from the proposed wells would be gathered and transported via buried water pipelines to water re-injection wells within the POD. Produced water collection, transport and disposal, is addressed in detail in the MSUP and appended Doty Mountain Unit Water Management Plan (WMP).

The only method of produced water disposal considered and analyzed under the "proposed action" and this EA is subsurface re-injection using underground injection disposal wells permitted by the State of Wyoming and approved by BLM. At new injection facilities, it is anticipated that subsurface water sumps will be constructed in lieu of above ground storage tanks. Any modifications to this proposal will be submitted via a Sundry Notice for review prior to approval.

Produced water collection, transport and disposal, is addressed in further detail in the MSUP and Water Management Plan (WMP).

No Action Alternative

NEPA regulations require that alternative analyses in NEPA documents "include the alternative of no action" (40 CFR 1502.14(d)). For this analysis, "no action" means that the BLM would reject the proponent's proposal and "the proposed activity would not take place."

Potential Environmental Affects of the "Proposed Action" Alternative

Environmental Elements	Affected		Environmental Elements	Affected	
	Yes	No		Yes	No
Air Quality	X		T / E Species		X
ACEC's		X	Wastes, Hazardous/Solid	X	
Cultural Resources	X		Water Quality		X
Prime/Unique Farmlands		X	Wetlands/Riparian Zones	X	
Floodplains		X	Wild and Scenic Rivers		X
Native Amer. Rel. Concerns		X	Wilderness		X
Environmental Justice		X	Invasive, Nonnative Species	X	

In addition to the environmental elements referenced in the above table, reviews of potential effects upon paleontological, visual and recreational, soil, vegetation, and wildlife resources were conducted.

The affected environment and analysis of environmental impacts are discussed in the AREIS to which this EA is tiered. Air quality impacts are also disclosed and analyzed in the AREIS; potential air quality impacts from the Proposed Action discussed herein are not expected to cause air quality standards to be exceeded.

A POD Project Map showing the known wildlife resources in the area of the project is attached.

Halogeton, russian thistle and other invasive weeds and their spread are a significant concern for this project area. They are currently present and scattered throughout the project and general area, associated with present activities and disturbances associated with ranching and grazing as well as gas exploration/development. These species have increased dramatically following soil disturbance within this project/general area. COAs have been added to control the spread, establishment, and plant community changes associated with weed infestation.

Additionally, the BLM is not currently aware of any methane seeps within the Doty Mountain Unit POD C. However, methane seeps (including the potential for their increase and associated impacts) are disclosed and addressed in the AR FEIS and Record of Decision (ROD), including: FEIS, Chapter 4, at Page 4-32, 4-33, 4-49, 4-52; and in the Record of Decision, Appendix B at Page B-10 and B-11. Relative to methane seeps, BLM, via collaborative monitoring efforts, can determine whether adaptations in CBNG development and production management is needed; currently, there are no national or state standards or thresholds for greenhouse gas emissions or concentrations that have been established through law or regulation.

To evaluate groundwater impacts in the area (including methane seep considerations), monitoring wells were required as part of the Interim Drilling Policy during preparation of the AR EIS (see ROD, Appendix A). Additional monitoring wells were then required as part of the AR ROD (Appendix B at Page B-10) and as a Condition of Approval of the adjacent approved Sun Dog POD's (2007) and the Doty Mountain Unit POD's (2008). The Doty Mountain Unit Water Management Plan also provided for the installation, testing and analysis of monitoring and reference wells within the Unit. The BLM will evaluate information from these wells, along with other cooperative studies in the area, in order to appropriately respond to issues that may arise.

Cultural Resources:

A discussion of the affected environment for cultural resources, including the historic trails, can be found in the final AREIS at Section 3.11 Cultural and Historical Resources, page 3-122. A Class III cultural resource inventory was conducted for each component of the proposed project so that appropriate mitigation measures could be developed to reduce or eliminate adverse impacts to cultural as well as historic sites and resources. Although the historic trails and roads and associated avoidance (buffer) areas themselves were not directly affected or impacted, the proposed project is located within the two mile view-shed of the historic Overland Trail (48CR932) and Rawlins to Baggs Wagon Road (48CR3648). As a result, some of the project and components will be visible from contributing segments of the historic trail and road.

The proposed project has the potential to impact cultural resources as described in the final AREIS at Section 4.11 Cultural Resources, page 4-116. Impacts to archaeological resources identified during the Class III cultural resource inventory will be avoided where possible and or mitigated as described in the final AREIS at Appendix I Cultural Resources Management, page I-8. Site-specific stipulations in the form of COA attached to the APD (e.g. archaeological monitoring, construction barrier fencing, etc.) are applied for specific locations, as necessary.

Since the project is located within two miles of the historic Overland Trail and the Rawlins to Baggs Wagon Road and some project components will be visible from contributing segments of the historic trail/road, certain measures were taken at the field onsite inspections to relocate well pads, roads and utility corridors to less visible areas where possible and practical (refer to the added mitigation table in the following Visual Resource section). Because adverse affects to the historic trails and roads were identified in the AREIS, a Programmatic Agreement (PA) was executed between the BLM, SHPO, ACHP, proponents, and other interested parties to develop the necessary mitigation to minimize impacts to the setting of the historic trails and roads. As a result additional general or project and more site specific mitigation measures were developed, and restrictions or stipulations in the form of COA have been developed and are added to the MSUP APD authorizations as appropriate. Those stipulations are summarized below:

For all wells and associated infrastructure in POD C:

- 1) Standard cultural stipulation regarding the discovery of cultural resources (general permitting requirements).
- 2) All surface facilities will be painted a color compatible with the local environment.
- 3) The access road will be surfaced with material compatible with the local environment.
- 4) The Operator shall select and use a seed mix most applicable to each disturbed location, with the goal of restoring individual sites to closely resemble the pre-disturbance native plant communities, as provided in Appendix A of the ROD, "Project Reclamation Plan."

Additional mitigation measures stipulated for individual wells and/or infrastructure within two-miles of the Rawlins-Baggs Road to reduce visual impacts to the setting:

Wells 3-12, 7-12, 9-12i, 13-12, 15-12, and Fee 13-1 access road, and related access/utility corridors:

- 5) Unless otherwise authorized, the pipelines/utilities will be plowed or ripped into the un-bladed surface (using technology that does not require trenching). If such techniques are infeasible due to safety, terrain or geology, the surface will be brush hogged and the utilities will be placed no farther than the outside edge of the ditch slope.
- 6) No blading will be allowed outside the staked well location for placement or removal of the topsoil stockpile.

Wildlife Resources:

Portions of the proposed actions (wells, pads, access roads and pipeline/power-line right-of ways/corridors) are located within the two mile protective buffer of a greater sage grouse lek, and within potential migration routes for mule deer. Numerous well pads/locations, roads, and corridors were relocated so that all were located outside the established "Controlled Surface Use" (CSU) area for the lek. The CSU applies to the area within a one-quarter mile radius from the lek perimeter, where all surface activity is strictly controlled or prohibited. As a result of the lek location and the two mile buffer, seasonal restrictions or stipulations¹ in the form of COAs were added to the MSUP APD authorizations as applied mitigation measures for sage-grouse. There are currently no proposed stipulations or mitigation measures for mule deer migration corridors, which are currently under study and consideration. Those wells/locations affected are summarized below:

Well Name	Grouse Stips ¹
3-12	x
Access road	x
5-12	x
Access road	x
7-12	x
Access road	x
9-12i	x
Access road	x
13-12	x
Access road	x
15-12	x
Access road	x
13-1	not applicable
Access road	x

1 Greater Sage-Grouse Stipulations: Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1 to July 15 for the protection of sage grouse.

2 Mule Deer Migration Corridors: BLM considered recently obtained data (including, Sawyer, 2006. *Progress Report for the Atlantic Rim Mule Deer Study*) regarding potential mule deer migration routes in the project area, which was incorporated into the wildlife review of the project. As the potential migration corridors are still being studied and considered there are currently no established or recommended stipulations or mitigation measures.

Exceptions to Stipulations: In some instances, the operator may request consideration of a temporary exception to wildlife seasonal restrictions or stipulations. Such exceptions may be granted on a limited individual case by case basis if a determination is made by a BLM wildlife biologist that the wildlife resource will not be adversely impacted.

The BLM fisheries biologist attended onsite inspections and considered potential impacts to Muddy Creek's 6840 BLM Sensitive fish species and determined no additional mitigation or monitoring requirements for the proposed action were necessary, other than the accepted measures for erosion protection and reclamation practices.

Recreation:

Direct impacts to recreation from the proposed project will be an alteration of recreational settings from a physical middle country and social back country to rural and industrial settings. The recreational settings are the foundation for most recreational activities, experiences, and benefits. The alteration of the settings will displace recreationists to alternative areas with the desired settings. A thorough description of the impacts to recreation can be found in the AREIS, Section 4.9 Recreation Resources page 4-98.

Visual Resources:

The proposed project will introduce new elements of form, line, color, and texture which will contrast with the surrounding existing elements. Impacts to visual resources can be found in the AREIS, Section 4.10 Visual Resources page 4-105. Mitigation to address the impacts will follow the best management practices listed in Appendix H: Required Best Management Practices page H-6, Visual Resources. Every attempt has been made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. As the predominant vegetation in the project area is sagebrush, all above ground facilities not requiring safety coloration must be painted with the color selected for a sagebrush environment dominant environment, which is a non-reflective Shale Green (Munsell Color chart 5Y 4/2). Native soils and gravels that blend with the local environment are required for the access roads.

No tanks or separators are planned for these locations. Produced fluids and natural gas will be removed from the locations via buried underground pipelines for processing offsite. The well locations will house a small gas metering/storage building, a well head/power head and an electrical control and power supply panel above ground. These will be painted to blend with the surrounding environment. The injection well pad will also contain a below ground sump well for storage. There were also overlapping visual requirements associated with the historic trails as discussed in the previous cultural resources section. Additional or added mitigation measures applied using Best Management Practices (BMP's) and Visual Resource Management (VRM) as a result of the onsite inspections is found in the following table:

Wells	Added Mitigation for Visual Resource Management/Cultural Resources
AR Federal 1791 3-12	The well-pad was located in a flat bare area partially surrounded by small hills and ridges to lessen the impact on the grouse lek and to minimize the cuts and fills and visibility from the trail segments. To lessen the grouse and trail impact, the proposed access road was relocated to utilize an existing two-track that follows along a small ridge and is partially hidden from view.
AR Federal 1791 5-12	The well-pad was located in a flat bare area above an existing drainage and on the side of a ridge to lessen the impact on the grouse lek and trail segments and to minimize the cuts and fills and the proximity to the drainage. The proposed access road was relocated to utilize as much of an existing two-track (partially hidden from view) as possible to access the well location and lessen the visual impact on the lek and trail segment.
AR Federal 1791 7-12	The well-pad was re-located outside the lek ¼ mile CSU in a flat bare area partially surrounded by small hills and ridges to lessen the impact on the grouse lek and to minimize the cuts and fills and visibility from the trail segments. To lessen the grouse and trail impact, the proposed access road was relocated to utilize part of an existing two-track that follows along a ridge and a lower ridgeline that is partially hidden from view to access the well location.
AR Federal 1791 9-12i	The well pad and access road was located in a flat low area below a large ridge to minimize cuts/fills and visibility. The well pad was moved further away from an existing drainage and reshaped and the access road relocated to avoid a small head-cut to minimize drainage impacts.

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- AR Federal 1791 13-12 The well pad and access road was located in flat low area below a large ridge to minimize cuts/fills and visibility. The well pad was shifted slightly and reshaped away from an existing drainage. The access road was relocated to avoid the sage grouse lek CSU. The main access road was relocated above a major drainage and head-cut to minimize impact on the drainage and access the well location from an existing road/well and to minimize visibility.
- AR Federal 1791 15-12 The well pad was located in flat low area below a large ridge to minimize cuts/fills and visibility. The well pad was shifted slightly and reshaped away from an existing drainage. The access road was relocated to avoid the sage grouse lek CSU and to minimize visibility. The main access road to the well location was relocated above a major drainage and head-cut to minimize impact on the drainage and access the well location from an existing road/well.
- AR Federal 1791 13-1 The access to this fee well location utilizes an existing road and utility corridor and the proposed new constructed access road utilizes an existing utility corridor across fee as well as federal surface. The new road is located in the corner of the sections on the side of a flat low ridge to minimize cuts/fills, visibility and impact.
-

Other site-specific findings by the interdisciplinary review team are provided in the review documents that accompany the POD MSUP and well APD and this EA in the BLM RFO lease/well and POD/Unit files.

The BLMs analysis of the proposed action included site-specific review of potential impacts to sensitive species, using the experience and expertise of the BLM biologists as well as data and knowledge collected by the BLM, Wyoming Department of Game and Fish, U.S. Fish & Wildlife Service, and other organizations.

Other, site-specific Conditions of Approval (such as archaeological monitor, barrier fencing, etc.), are also applied, where applicable.

Description of Impacts

A discussion of the actions generally associated with drilling projects and their associated impacts may be found in the Atlantic Rim Environmental Impact Statement and Record of Decision.

Hazardous Materials

Anadarko has indicated that some hazardous materials could be used during drilling, completion, and production of their proposed wells. The term "hazardous material" as used here means: 1) any substance, pollutant, or contaminant (regardless of quantity) listed as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, 42 U.S.C. 9601 et seq., and the regulations issued under CERCLA, 2) any hazardous waste as defined in the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, and 3) any nuclear or nuclear byproduct as defined by the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2011 et seq.

It is possible that wastes created or transported during implementation of the proposed action (i.e., waste motor oils, drilling/completion additives) could be accidentally released to the environment. The operator will be required to comply with the Hazardous Materials Management Plan provided in Appendix C of the AREIS. Numerous State and Federal rules and regulations also apply that govern the handling, storage, and disposal of hazardous substances.

Anadarko or any contracted company working for Anadarko will have Material Data Safety Sheets available for all chemicals, compounds, or substances which are used during the course of construction, drilling, completion, and production operations for this project. Additionally, all chemicals will be handled in an appropriate manner to minimize the potential for leaks or spills to the environment.

Impacts to soils, surface and groundwater resources, wildlife, vegetation, and human health could result from the accidental exposure of hazardous materials.

However, since the project operations will strictly comply with all applicable federal and state laws concerning hazardous materials, the Hazardous Materials Management Plan for this project, and the operator's Spill Prevention Control and Countermeasure Plan, no significant impacts are anticipated.

Reclamation

Interim reclamation is typically initiated and completed within 6 months of drilling completion. The drill pads will be reduced to a less than one-half acre production well site at each location. Total reclamation of all new disturbances will take place as the wells and facilities are no longer productive or needed and are plugged and abandoned. Appendix A of the ROD contains the reclamation success criteria by which the reclamation status will be judged. The approved Master Surface Use Plan and Conditions of Approval also contain reclamation measures pertaining to reclamation standards.

Description of Mitigation Measures and Residual Impacts

Mitigation of potential effects is part of the proposed action, and specific mitigation details can be found in the Master Plan Elements including the Conditions of Approval. Residual impacts resulting from the proposed action would include permanent loss of oil and/or gas reserves should the wells become productive. In addition, the well pads, production equipment, and the access roads could remain in place for 30 years or more (until plugging and abandonment, final reclamation).

Potential Environmental Impacts- No Action Alternative

Under the No-Action Alternative, the proposed action would not be authorized. The wells would not be drilled nor locations and facilities constructed, and gas production from the proponent's federal lease would not occur. Existing development would continue to occupy the project area, along with the impacts associated with the existing as well as any future gas development and production on adjacent private (fee) and or state leases. Under the no action alternative, gas development and production (and depletion) along with any associated impacts, could continue in the project area but on the fee and state leases.

Residual Impacts/Cumulative Impacts:

The potential residual and cumulative impacts are discussed in the AREIS, Chapter 5, and Cumulative Impacts Analysis. The proposed action entails the addition of 5 CBNG wells, 1 produced water re-injection well, and associated facilities and infrastructure.

Standard mitigation guidelines are addressed in the ROD's Appendix A, Project Reclamation Plan. Additional mitigation measures are also provided in Appendix B, Performance-Based Monitoring and Best Management Practices, and Appendix C, Operator-Committed Practices. All needed mitigation, for that portion of the proposed action on public land, is part of the proposed action.

The access roads and well/production pads may remain visible for a period of approximately 20 to 30 years after they are abandoned and reclaimed. The oil and gas resource will be permanently lost. All needed mitigation is part of the proposed action.

Additional mitigation measures are addressed in the AREIS, under; Appendix A: Reclamation Plan; Appendix C Hazardous Materials, and; Appendix D Wildlife Protection Plan. All recommended mitigation for that portion of the proposed action on public land, is part of the proposed action and plan of operation found in the well POD MSUP with COA and APD.

Other Persons/Agencies Contacted and or Consulted:

Paul Avant	Permitting/Regulatory	Anadarko E&P Comp
Gary Sundberg	Permitting Consultant	Anadarko E&P Company
Dennis Schult	Hydrologist	BLM, Rawlins Field Office
Heath Cline	Wildlife Biologist	BLM, Rawlins Field Office
Bruce Estvold	Civil Engineer	BLM, Rawlins Field Office
Patrick Walker	Archaeologist	BLM, Rawlins Field Office
Neal Ruebush	Realty Specialist	BLM, Rawlins Field Office
TJ Murry	Rangeland Specialist	BLM, Rawlins Field Office
Mark Newman	Geologist	BLM, Rawlins Field Office
Jerry Dickinson	Petroleum Engineer	BLM, Rawlins Field Office
Shawn Anderson	Fisheries Biologist	BLM, Rawlins Field Office

Other Persons/Agencies Contacted Cont'd

Brian Smith	Recreation Planner	BLM, Rawlins Field Office
Susan Foley	Soils Scientist	BLM, Rawlins Field Office
Skip Stonesifer	Natural Resource Spec.	BLM, Rawlins Field Office
Cade Powell	Wildlife Biologist	Wyoming Game & Fish Dept.

FINDING OF NO SIGNIFICANT IMPACT/DECISION RECORD (FONSI/DR)

Decision

I have reviewed this environmental assessment including the explanation and resolution of any potentially significant environmental impacts, public comments, and errata to this EA (see Appendix A to this Decision Record, "Errata"). I have selected the proposed action alternative with the mitigation measures described below for authorization and implementation. I have determined that the proposed project is in conformance with the approved land use plan. It is my decision to implement the project with the mitigation measures identified below.

Finding of No Significant Impact

Based upon the analysis of potential environmental impacts contained in the EA, I have determined that the impacts are not expected to be significant, and that an EIS is not required.

Rationale for Decision

Compared to the No Action Alternative, the Proposed Action Alternative best meets the Purpose and Need and guiding laws, regulations, and directives, including the Federal Land Policy and Management Act (FLPMA, 43 USC 35). The proposed action is in conformance with the Great Divide Resource Management Plan (RMP) and the Atlantic Rim Natural Gas Field Development Project EIS.

Public Comments/BLM Responses

Appendix B to this Decision Record contains a summary of substantive public comments received for this action, and corresponding BLM responses.

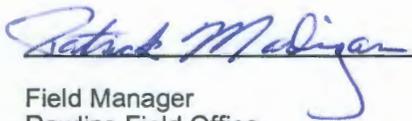
Mitigation Measures/Remarks:

All needed mitigation is a part of the proposed action and is found in the Master Surface Use Plan, and accompanying attachments and appendices, with the Conditions of Approval for the MSUP and APD's. A total of six (6) well APD (5 Coal Bed Natural Gas wells and 1 water re-injection well), unless specified otherwise in the COA, are authorized under this decision, along with associated well pads, access roads, pipelines, power-lines and utility corridors.

Monitoring and Compliance

Designated BLM personnel will monitor operations under authorizations for the proposed action as needed to ensure compliance with the Master Surface Plan and Conditions of Approval.

Authorized Official:



Field Manager
Rawlins Field Office

8 9-05-08

Date

Appeal

Under BLM regulation this decision is subject to appeal. Under BLM regulation, this decision is subject to administrative review in accordance with 43 CFR 3165. Any 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 within 20 business days of the date this Decision Record is received or considered to have been received.

Appendix A to the Decision Record

ERRATA

Modifications and Corrections To The
Doty Mountain C Plan of Development (POD)
Environmental Assessment (EA)

Potential Environmental Affects of the "Proposed Action" Alternative

The Wildlife Resources table on Page 8 of the EA included Mule Deer², with related footnote. This was included and intended for informational purposes and reference only, and not to indicate or imply the availability or application of any stipulations for Mule Deer Migration Corridors. In an effort to avoid any confusion the reference to Mule Deer² has been removed from the table.

CHANGE:

2 Mule Deer Migration Corridors: BLM considered recently obtained data (including, *Sawyer, 2006. Progress Report for the Atlantic Rim Mule Deer Study*) regarding potential mule deer migration routes in the project area, which was incorporated into the wildlife review of the project. As the potential migration corridors are still being studied and considered there are currently no established or recommended stipulations or mitigation measures.

TO:

BLM considered recent local mule deer movement data (including *Sawyer 2006 Progress Report for the Atlantic Rim Mule Deer Study*; *Sawyer 2007 "Final Report for the Atlantic Rim Mule Deer Study"*; and *Sawyer and Kauffman 2008 "Identifying Mule Deer Migration Routes in the Atlantic Rim Project Area"*) during wildlife review of this project. An interagency working group initiated by the adaptive management direction in the Atlantic Rim ROD is evaluating activities and infrastructure in areas identified as mule deer migration habitat. The objective is to use the studies and ongoing monitoring to determine whether, where and how development places attainment of the performance goal for migration habitats at risk, and if so, how to mitigate those risks. The working group has not yet identified any impacts to migrating deer from current POD development. As a result, the review team has not yet approved additional preventative stipulations or other mitigation measures for migration habitats potentially affected by this project.

End Errata

Appendix B to the Decision Record

Summary of EA Comments and BLM Responses

Two (2) comment letters were received (Biodiversity Conservation Alliance on behalf of Biodiversity and the Natural Resources Defense Council, August 26, 2008, via email/hardcopy, and Husch, Blackwell, Sanders, LLP on behalf of the Theodore Roosevelt Conservation Partnership, August 27, 2008 via fax/hardcopy). The letters have been reviewed to determine whether the information they provided would warrant a determination other than a Finding of No Significant Impact (FONSI). Substantive comments are summarized below, with BLM responses to the comments in italics. The RFO would like to thank all who commented for taking the time to review the EA.

As noted in the EA (Page 2), information about the proposal was posted in the RFO public room for a 30-day period upon submittal by the proponent (beginning December 31, 2007). In addition, the BLM online NEPA register provides notice of actions for which NEPA documentation is prepared, including the proposal considered under this Environmental Assessment.

In reviewing the comments received, there were some instances where substantial comments were made but we could find no project-specific comments or any description of (1) new information, (2) why or how the analysis is flawed, (3) evidence of flawed assumptions, (4) evidence of error in data presented, or (5) requests for clarification that bear on conclusions presented in the analysis. This was the standard used to identify substantive comments for the following responses.

Biodiversity Conservation Alliance, Comments:

I. Sage Grouse Leks

"Populations of sage grouse continue to decline. Yet, BLM persists in relying on mitigation measures that have already failed in other areas. The AR FEIS failed to adequately discuss whether its proposed mitigation measures for sage grouse are appropriate or scientifically defensible".... Indeed, BLM has determined that the quarter-mile NSO buffers and two-mile seasonal stipulations applied under this project are inadequate to sustain sage grouse populations in the Powder River Basin at identical CBM well densities.... Neither of these issues is addressed in the Doty Mountain B [sic] EA. BLM is plowing ahead with more drilling permits before it has taken steps to prevent the steady and dramatic decline of the sage grouse. Contrary to the mandates of the BLM's own Sensitive Species policy and the Great Divide Resource Management Plan, BLM's approval of Doty Mountain B [sic] will harm sage grouse leks and nesting habitat".

"Furthermore, the State of Wyoming has initiated a new sage grouse conservation policy by Executive Order, which depends on conservation of sage grouse in designated Core Areas. See Attachments 3 and 4. This policy constitutes significant new information that has become available subsequent to the issuance of the Atlantic Rim, ROD, and thus tiering to this NEPA analysis is unavailing. Supplemental NEPA will be required to address this issue. The Doty Mountain C Pod appears to be within a designated Core Area, meaning that development cannot occur unless it is compatible with maintaining sage grouse populations".

"As a result of these impacts and considerations, significant impacts to sage grouse are likely and an EIS will be needed prior to project approval".

The BLM recognized significant impacts are likely to occur from the implementation of oil and gas projects in the area analyzed in the AR FEIS/ROD. Potential impacts to sage grouse (including wintering sage grouse) from activities such as those in the proposed action have been discussed in the FEIS (see Page 4-75 through 4-78). The subject ROD and tiered EA include both broad-based and site specific mitigation measures, respectively, to reduce or eliminate potential adverse environmental effects.

The BLMs analysis of the proposed action included site-specific review of potential impacts to sage grouse, consideration of available guidance such as Connelly et.al. (Wildlife Society Bulletin 2000, 28(4):967-985), BLM 2004-057, the RFO Sage Grouse IM, and utilization of the experience and expertise of the BLM biologists as well as data and knowledge collected by the Wyoming Department of Game and Fish, U.S. Fish & Wildlife Service, and other organizations. This analysis of site-specific impacts, the resultant moves and changes in the proposed action

and final site-specific Conditions of Approval is addressed in the EA and also by reference (as are specific findings by the interdisciplinary review team).

No substantiation is provided for the opinion that the project analysis process was flawed, so we cannot confirm that conclusion. The seasonal restrictions applied are supported by programmatic BLM decisions (such as the Great Divide RMP and Atlantic Rim ROD, among others), and are consistent with BLM policies developed in consultation with agencies such as the Wyoming Department of Game and Fish. While BLM acknowledges that studies and related findings in the AR area are limited and/or specific to the types of development occurring in that area, BLM and operators are actively working with the Wyoming Game and Fish Department to reduce the impact to grouse as a result of development and to remain in compliance with BLM Manual 6840.

The BLM is also aware of the State of Wyoming's Executive Order 2008-2 Greater Sage-Grouse Core Area Protection. This is an executive order by the State of Wyoming that applies to state agencies (only), and provides for state agency collaboration with federal agencies, such as the BLM, in implementing the Executive Order. At this time, as this order was only signed into effect August 1, 2008, the BLM is unaware of and cannot predict the exact level, extent and nature of that collaboration and/or implementation.

II. Water Quality and Downstream Sensitive Fishes

"The EA fails to discuss the potential effects of the Doty Mountain Unit C POD on water quality and downstream sensitive fish species. We are concerned that proposed activities, when occurring on highly saline, erodible, or unstable soils will contribute to significant impacts to the watershed and downstream native fishes." "The level of direct and cumulative salt loading to the Colorado River System also has not been disclosed, potentially leading to violations of the Colorado River Compact.

The Colorado River Basin Salinity Control Forum, with particular reference to salt loading, is discussed in the EIS (Volume 1, page 4-28). Its administration via the Wyoming Department of Environmental Quality (DEQ WYPDES), and compliance with the DEQ WYPDES Storm Water Program is an integral part of operator obligations; monitoring/reporting/mitigation are implicit in these permits.

While the Doty C project does not propose point source surface discharges, all manner of possible best management practices are applied during project planning, development, interim reclamation, production, and final reclamation stages to control erosion/runoff and salt mobilization in sensitive catchments; the Atlantic Rim EIS/ROD and site-specific Conditions of Approval all address and minimize the project's potential erosional effects.

Channels within the Doty C POD project area drain into Dry Cow Creek. While sensitive species have not been documented this season in Dry Cow Creek, this does not preclude the possibility of their historical and/or future presence. Again, project Best Management Practices are deemed to be protective of possible significant impacts to these populations (as applicable). As site-specific NEPA analysis is issue-driven, it is up to the BLM Authorized Officer to determine the scope of the proposed action and the analysis of impacts. If particular resources do not exist in the project area, or in the area identified as the cumulative impact analysis area, it is not necessary to analyze or discuss these resources in the EA (40 CFR 1500.1(b), 1502.20 & 1508.28). BLM watershed and fisheries decisions are also consistent with BLM policies developed in consultation with agencies such as the Wyoming Department of Game and Fish.

The Doty C project impacts are not considered to meet either surface or groundwater significance criteria as defined in the EIS (Volume 1, page 4-24). Similarly and at this time, the Rawlins BLM is not aware of NEPA analysis, planning decisions and/or existing on-the-ground conditions within its Field Office boundaries/jurisdiction that violate the Colorado River Basin Salinity Control Act.

In general, you provide no data or substantiation for your opinion that the project analysis was flawed, so we cannot confirm your conclusion.

III. State Certifications Required by Section 401 of the Clean Water Act

"BLM must require that project proponents have acquired certifications (or waiver) from the State of Wyoming, pursuant to Section 401 of the Clean Water Act. The EA should, but does not, indicate whether such certifications have been acquired."

The proponent must comply with all laws, standards, and criteria set forth by all appropriate Federal, State, and Local authorities; which is a standard requirement included in BLM's Conditions of Approval.

This project does not involve point source discharges that may make their way to navigable waters of the United States, and therefore, the proponent is not required to have acquired certifications (or a waiver of such certifications) from the State of Wyoming, pursuant to Section 401 of the Clean Water Act, 33 U.S.C. §1341." The BLM is aware that Section 401 of the Clean Water Act (33 USC 1341) requires applicants for a federal license or permit that would authorize discharge into waters of the United States to obtain a certification from the State in which the discharge originates. On March 20, 2007, the U.S. Army Corps of Engineers obtained certifications from the Wyoming Department of Environmental Quality for most Nationwide General Permits that authorize discharges pursuant to Section 404 of the Clean Water Act (33 USC 1344) in Wyoming. All certifications remain valid until March 18, 2012, for discharges authorized by nationwide permits and project proponents are not required to obtain separate certifications prior to undertaking those activities. Therefore, roads, pads, pipelines, produced water management structures, and other common activities that result in discharges are currently authorized because certification has been granted. Certifications of any other discharges that are not currently authorized cannot be acquired until the need for a permit arises. The BLM is confident that those certifications would be acquired by the project proponent as applicable and as certified in the Doty C Water Management Plan.

IV.Methane

"BLM continues approve drilling permits without even beginning to collect data regarding the potential for methane seeps." "BLM should quantify potential emissions of methane."

A cooperative working group, including operators and regulatory agencies (WY DEQ, WOGCC, WSGS, and the BLM) formed in March 2007 with the goals, in part, of surveying the project area for seep presence; understanding methane seep risks; considering actions (where applicable) to address the welfare, health, and safety of human and wildlife activity in the area; developing geological models to characterize seeps (including consideration of differing survey and gas and water sampling methodologies); ensuring methane seeps are not present prior to location construction; and monitoring methane seep activity during development of the field.

Methane (which is a greenhouse gas) emissions are not regulated (nor are there any national or state standards) by either the EPA or Wyoming DEQ. Currently the EPA has not established emissions thresholds for methane (or any other greenhouse gas). Without a method or meaningful metric established by EPA there are no jurisdictional or compliance responsibilities for the EPA or the State of WY.

The Atlantic Rim EIS analyzed potential impacts of various air quality pollutants. Under the current Rawlins RMP, analysis of potential greenhouse gas impacts is beyond the scope of the management; NEPA does not require agencies to address "remote and highly speculative consequences," such as the possibility that isolated, unknown, and/or impossible to predict phenomena such as methane seeps exist.

The BLM is not currently aware of any methane seeps within the Doty POD C project area. Methane seeps (including the potential for their increase and associated impacts) are disclosed and addressed in the AR FEIS and Record of Decision (ROD), including: FEIS, Chapter 4, at Page 4-32, 4-33, 4-49, 4-52; and in the Record of Decision, Appendix B at Page B-10 and B-11.

V.Air Quality

"BLM is proceeding without the full picture it needs regarding ozone pollution. BLM relied on an obsolete method to predict ozone impacts and should not approve Doty Mountain Unit POD C or any other drilling permits until it corrects and updates its air quality analysis of ozone impacts."

Please refer to Page E-9 of the Atlantic Rim Record of Decision.

BLM is unaware of an exceedance of NAAQS standards at area air quality monitoring stations.

Mule Deer Migration Corridors

"BLM recognizes the recently completed Atlantic Rim Mule Deer Study, which identifies a mule deer migration corridor running through the center of the Project area. EA at 9. This study constitutes new information, rendering the NEPA analysis in the larger Atlantic Rim EIS obsolete. BLM recognizes the recently completed Atlantic Rim Mule Deer Study, which identifies a mule deer migration corridor running through the center of the project area. EA at 9. This study constitutes new information, rendering the NEPA analysis in the larger Atlantic Rim EIS obsolete. The site-specific road and well [siting] for this project lies directly across this corridor. In addition, the nearby alignments of Doty Mountain A and B pods and Catalina Unit are now known, yet BLM has not attempted a direct or cumulative impact analysis of these CBM developments on the migrations of mule deer based on this newly available site-specific road and well site location information, in violation of NEPA. There is a likelihood of significant environmental impacts at the POD level for this project, rendering a full EIS with supplemented direct and cumulative impacts analysis a necessity .

See errata

Theodore Roosevelt Conservation Partnership Comments:

"BLM should not approve the Proposed Action as currently configured because it conflicts with the Record of Decision approving the Atlantic Rim Natural Gas Field Development Project (March 2007) ("ROD") and authorizes activity not analyzed in the Final Environmental Impact Statement for the Atlantic Rim Natural Gas Field Development Project (Nov. 2006) FEIS").... Specifically, three wells identified as part of the Proposed Action would be located within a narrow (0.5 mile) mule deer migration corridor, the functionality of which must be maintained to connect key areas of crucial winter range in the Atlantic Rim Project Area ("ARPA").

See errata