

FINDING OF NO SIGNIFICANT IMPACT
Bureau of Land Management
Rock Springs Field Office

Project Title: Table Rock Unit Oil and Gas Development

EA Number: WY-040-EA11-175

Location of Proposed Action: Sweetwater, County Wyoming, portions of Townships 18 N. and 19 N., Range 97 W. and 98 W.

Applicant: Chevron U.S.A., Inc.

BACKGROUND

Chevron U.S.A., Inc. (Chevron) submitted a project description to the Bureau of Land Management (BLM) Rock Springs Field Office (RSFO) and Rawlins Field Office (RFO) in March 2011 and a public scoping notice was posted on the BLM website on May 6, 2011, initiating the 30-day public scoping period. Chevron proposes to develop new oil and gas wells in the Table Rock Unit, approximately 40 miles east of Rock Springs in Sweetwater County, Wyoming.

Chevron currently holds all leases and operates 100 wells and a gas processing plant in the Table Rock Unit. The project area consists of approximately 13,633 acres on public, state, and private land, distributed in a checkerboard pattern.

Under the Proposed Action, Chevron will develop up to 88 wells over 14 years: 33 shallow oil and gas wells, 20 deep gas wells, and up to 35 water injection wells. The total well life would be approximately 40 to 55 years. Drilling operations would utilize a combination of vertical and directional techniques, as appropriate, and all producing wells would be hydraulically fractured. The shallow oil and gas wells will be produced using a water flood.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the information contained in the Table Rock Unit Oil and Gas Development environmental assessment (WY-040-EA11-175) and all other information available to me, it is my determination that:

(1) the implementation of the Proposed Action will not have significant environmental impacts beyond those already addressed in the Green River Resource Management Plan (GRRMP) and the Rawlins Resource Management Plan (RRMP). The Record of Decision for the GRRMP was signed August 8, 1997 and the RRMP was signed December 24, 2008.; (2) the Proposed Action is in conformance with the Resource Management Plans; and (3) the Proposed Action does not constitute a major federal action having a significant effect on the human environment. Therefore, an environmental impact statement or a supplement to the existing environmental impact statement is not necessary and will not be prepared.

The Proposed Action has been designed to avoid or minimize environmental impacts to the extent feasible. The following mitigations measured have been identified for the proposed action:

- Siting pipelines within existing Rights Of Way (ROW).
- Use of existing roads to minimize surface disturbance for new roads.
- Use of closed loop systems for drilling.
- Reuse of drilling water for shallow wells to the extent possible.
- Use of produced water for the water flood.
- Monitoring wells remotely to minimize vehicle travel.
- Minimize air emissions by utilizing electric pumps and other equipment for most wells.
- Utilize green completions to minimize air emissions where feasible.
- Reclaim all disturbed areas not needed for production by grading and seeding to BLM standards.
- Dust abatement to minimize potential effects from increased road use.
- Application of effective noxious and invasive weed control measures.
- Where possible, bare ground would be reclaimed to minimize erosion.
- Existing roads would be maintained to accommodate increased use.
- Surface Use Plans would site specifically identify species used for reclamation to increase reclamation success.

Environmental protection measures listed in the GRRMP and RRMP, and those developed to meet the Resource Management Plan (RMP) objectives, that pertain to oil and gas development, surface disturbance, road construction, pipelines, and the issuance of ROW permits would apply to development in the Table Rock Unit. The Table Rock Unit will be managed in a consistent manner where agreement between both the GRRMP and RRMP exists. Where there are differences in the GRRMP and RRMP environmental protection measures, management in the Table Rock Unit would default to the RMP covering the Field Office within which that portion of the Table Rock Unit lies.

Each BLM Field Office (RSFO and RFO) has approved native seed mixtures (grasses, shrubs, and forbs) that must be used to revegetate disturbed areas. All seed must be certified weed-free. Each seed mixture would be selected based on the soil type and species present prior to disturbance. For this reason, the seed mixture to be used at any one site would be identified during the onsite evaluation and specified during the Application for Permit to Drill (APD) process for each well.

Water wells on public lands that access class I, II, or III groundwaters as defined by Wyoming Department of Environmental Quality within the project boundary, within a mile of the outside of the project boundary, or that are used to supply additional water to the project will be sampled to determine baseline conditions and on a minimal annual basis to determine changes in water quality that could potentially be related to extractive activities. Results of this monitoring will be provided to the public and appropriate state and federal agencies on a timely basis. Water analysis of class I, II, or III groundwaters will be offered to private land owners within the designated area as well.

In the crucial winter range in the northern part of the project area, drilling operations would not be allowed from November 15 to April 30.

This finding is based on my consideration of the Council on Environmental Quality's criteria for significance (40 CFR 1508.27), both with regard to the context and to the intensity of the impacts described in the EA or as articulated in the letters of comment.

Context

The Table Rock Unit is located approximately 40 miles east of Rock Springs in Sweetwater County, Wyoming and was discovered in 1945. Since that time the unit has produced from 9 different formations. All depths were unitized in July 1945, creating the Table Rock Unit, which is the project area under consideration. The project area consists of public, state, and private land, distributed in a checkerboard pattern.

Intensity

I have considered the potential intensity/severity of the impacts anticipated from the Table Rock Unit Oil and Gas Development. As a result, I have determined that a FONSI is consistent with regard to each of the ten factors. The basis of these conclusions is summarized briefly below:

1. Impacts that may be both beneficial and adverse.

The proposed project is consistent with the GRRMP and RRMP and would provide the proponent access to develop federal mineral leases and would allow the lessee to develop existing leases subject to applicable federal and state laws and BLM policy. The need for the action is established by the BLM's responsibility under regulations including the Mineral Leasing Act of 1920, as amended, to review and approve the proposed plan of development and the Federal Land Policy and Management Act (FLPMA) of 1976 to prevent degradation of public lands.

As described in the EA, potential adverse impacts from the implementation of Alternative A (Proposed Action) include: disruption of soil horizons and vegetative communities and depletion of mineral resources. Other resources may have minimal impacts associated with the proposal, but impacts would be offset by Applicant-committed Environmental Protection Measures and step down analysis and additional measures applied at the APD stage. However, none of these impacts would be significant at the local scale or cumulatively because of the relative scale of the project, design features of the Proposed Action, and environmental protection measures.

Potential beneficial impacts from the implementation of Alternative A (Proposed Action) include socioeconomic improvements within Sweetwater County and other areas interacting with Sweetwater County.

2. The degree to which the proposed action affects public health and safety.

The proposed project is consistent with the GRRMP and RRMP and would provide for public health and safety. Applicant-committed Environmental Protection Measures and adherence to applicable federal, state and local laws and policies would also provide for public health and safety.

3. Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

Alternative A (Proposed Action) has no potential to affect unique characteristics such as historic or cultural resources or properties of concern to Native Americans. There are no wild and scenic rivers or ecologically critical areas present in the Project Area. Adherence to environmental protection measures and implementation of effective interim and final reclamation is expected to help maintain resource objectives for riparian, wetland, aquatic and terrestrial habitat.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The effects of the implementation of Alternative A (Proposed Action) are presented in the EA document. "Whether a proposed action is 'likely to be highly controversial' under 40 CFR 1508.27(b)(4) is not a question about the extent of public opposition, but, rather, about whether a substantial dispute exists as to its size, nature, or effect." *Missouri Coalition for the Environment*, 172 IBLA 226, 249 n.23 (2007). Comment letters on the EA provided no expert scientific evidence supporting claims that the project will have significant effects.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

Possible effects on the human environment are not highly uncertain and do not involve unique or unknown risks. The analysis for Alternative A (Proposed Action) does not show that this action would involve any unique or unknown risks.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

After thorough analysis, the EA properly determined that Alternative A (Proposed Action) would result in no significant unmitigated effects. This conclusion is based on the specific facts of this project and does not set a precedent for, or automatically apply to, future oil and gas development projects that the BLM may be reviewing. Future actions would be subject to evaluation through the appropriate level of NEPA analysis.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

No project specific or cumulative impacts associated with Alternative A (Proposed Action) have been identified that could not be avoided through the project's design or appropriate mitigation and avoidance measures. The impacts identified do not exceed the level of impacts outlined in the GRRMP or RRMP

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

Direct or indirect impacts to cultural and historic resources are not anticipated to occur from implementation of Alternative A. Surface disturbing activities at proposed locations would be minimal and no historic properties would be adversely affected due to avoidance and identification of conflicts through site specific evaluation at the APD level. The RSFO archeologists would review all proposed surface disturbance activities to determine if a Class III cultural resources inventory was conducted, and/or if a new inventory is required.

If cultural resources are encountered at proposed locations, those locations would not be utilized unless the proposal could be modified to avoid or mitigate adverse impacts to significant cultural resource sites.

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.*

Alternative A (Proposed Action) is not likely to adversely affect any listed species. Additionally, all proposed surface disturbing activities would be constructed and operated under the recommendations of a wildlife biologist to avoid adverse impacts to wildlife, including known sage-grouse leks, nesting and winter concentration areas, active raptor nests, White-tail Prairie Dog towns, Pygmy Rabbit habitat, Mountain Plover nesting habitat and big game crucial winter ranges and parturition areas.

10. *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*

Alternative A does not violate any known federal, state, local, or tribal law or requirement imposed for the protection of the environment. Additionally, the project is in compliance with the GRRMP and RRMP.

Authorized Official:



Lance Porter
Field Manager
Rock Springs Field Office

24 January 2012

Date