

Documentation of NEPA Adequacy (DNA)

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

Preparing Office: Arctic Field Office

DOI-BLM-LLAK010-2014-0010-DNA

Serial/Lease/Case File Number: **Serial # FF096701**

Project Title/Type of Action: **Waste Management Plan Revision 1 Approval**

Applicant: **ConocoPhillips Alaska, Inc.**

Address: **P.O. Box 100360
Anchorage, Alaska 99510-0360**

Date: **March 3, 2014**

Lands Involved (All Umiat Meridian):

Section 13, Township 10 North, Range 2 East, Umiat Meridian
70°13'27.80"N, 151°30'28.33"W.

A. Description of the Proposed Action and any applicable mitigation measures

The proposed action is a request by the applicant, ConocoPhillips, Alaska (CPAI) to discharge treated wastewater from the Alyeska Camp at CPAI's midway location. The BLM Arctic Field Office completed an EA (DOI-BLM-LLAK010-2014-0001-EA) on December 11, 2013 for CPAI's 2013-2014 winter exploration activities. Since that time, CPAI has notified us of the need to discharge the treated wastewater. The discharge hose runs about 20 feet from the back of the camp, and is about 4 feet off the ground. On the ground CPAI has put a piece of plywood so that when the water hits it, it spreads out instead of concentrating in one area. CPAI has an Alaska Department of Conservation (ADEC) permit AKG-57-0000 for the discharge. The discharge rate is 1500-2000 gallons a day of treated wastewater. The discharge is about 750 feet from Lake M9923.

The site was inspected by BLM natural resource specialists on February 13 and 14, 2014 (see photos below).



Applicable mitigation measures specific to the proposed action:

A-2 Best Management Practice

Objective: Minimize impacts on the environment from non-hazardous and hazardous waste generation. Encourage continuous environmental improvement. Protect the health and safety of oil field workers and the general public. Avoid human-caused changes in predator populations.

Requirement/Standard: Lessees/permittees shall prepare and implement a comprehensive waste management plan for all phases of exploration and development, including seismic activities. The plan shall be submitted to the authorized officer for approval, in consultation with federal, State, and North Slope Borough regulatory and resource agencies, as appropriate (based on agency legal authority and jurisdictional responsibility), as part of a plan of operations or other similar permit application. Management decisions affecting waste generation shall be addressed in the following order of priority: 1) prevention and reduction, 2) recycling, 3) treatment, and 4) disposal. The plan shall consider and take into account the following requirements:

- a. Methods to avoid attracting wildlife to food and garbage. The plan shall identify precautions that are to be taken to avoid attracting wildlife to food and garbage
- b. Disposal of putrescible waste. Requirements prohibit the burial of garbage. Lessees and permitted users shall have a written procedure to ensure that the handling and disposal of putrescible waste will be accomplished in a manner that prevents the attraction of wildlife. All putrescible waste shall be incinerated, backhauled, or composted in a manner approved by the authorized officer. All solid waste, including incinerator ash, shall be disposed of in an approved waste-disposal facility in accordance with EPA and Alaska Department of Environmental Conservation regulations and procedures. The burial of human waste is prohibited except as authorized by the authorized officer.
- c. Disposal of pumpable waste products. Except as specifically provided, the BLM requires that all pumpable solid, liquid, and sludge waste be disposed of by injection in accordance with EPA, Alaska Department of Environmental Conservation, and the Alaska Oil and Gas Conservation Commission regulations and procedures. On-pad temporary muds and cuttings storage, as approved by Alaska Department of Environmental Conservation, will be allowed as necessary to facilitate annular injection and/or backhaul operations.
- d. Disposal of wastewater and domestic wastewater. The BLM prohibits wastewater discharges or disposal of domestic wastewater into bodies of fresh, estuarine, and marine water, including wetlands, unless authorized by a National Pollutant Discharge Elimination System or State permit.

On December 12, 2013 the BLM approved CPAIs Waste Management Plan as submitted by CPAI to satisfy BMP A-2. BMP A-2d states that the BLM will allow wastewater discharge if the entity has a state permit, which CPAI has.

B. Land Use Plan Conformance

CPAI leases are subject to the NE SIAP/EIS (USDO I BLM 2008a) and associated ROD (USDO I BLM 2008b) lease stipulations, and the BMPs from the NPR-A IAP/EIS (USDO I BLM 2012) and associated ROD (USDO I BLM 2013).

The proposed action is in conformance with the NE SIAP/EIS (USDO I BLM 2008a) and associated ROD (USDO I BLM 2008b), the NPR-A IAP/EIS (USDO I BLM 2012) and associated ROD (USDO I BLM 2013), the Naval Petroleum Reserves Product Act (NPRPA), Federal Land Policy Management Act (FLPMA), Alaska National Interest Lands Conservation Act (ANILCA), Endangered Species Act, Executive Order (EO) 11988, EO 11990, and terms of the federal leases.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Environmental Assessment DOI-BLM-LLAK010-2014-0001-EA and the associated FONSI and Decision Record adequately cover all environmental issues associated with the proposed project. The discharge of treated wastewater is addressed in the NPR-A IAP/EISs (USDO I BLM 2008a Section 4.3.4, USDO I BLM 2012 Section 4.3.7.2).

The additional required analysis associated with the EA are also applicable to the current request:

- Essential Fish Habitat Assessment dated December 4, 2013
- Compliance with ANILCA Section 810 Evaluation and Findings dated November 15, 2013
- Assessment of Archaeological and Historic Resources dated December 6, 2013
- BLM Not Likely to adversely affect determination for spectacled and Steller's eider and polar bear dated November 11, 2013
- USFWS Concurrence of BLM determination dated November 25, 2013.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation:

The proposed action is the similar to the action analyzed in DOI-BLM-LLAK010-2014-0001-EA plus USDO I BLM 2008a and USDO I BLM 2012. There is not a substantial difference.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation:

The range of alternatives contained in DOI-BLM-LLAK010-2014-0001-EA consisted of the proposed action and the no action alternative. Fisheries, Sociocultural and Subsistence were identified as having potential impacts resulting from the proposed action. The treated wastewater discharge would not change the potential impacts. Under No Action, the Bureau of Land Management would not approve the revised waste management plan. The environmental situation and trends as described in the Affected Environment section of EA would continue as described. See Chapter III (Affected Environment) of DOI-BLM-LLAK010-2014-0001-EA for a more detailed profile of the current environmental situation for the issues that were considered to be potentially impacted by the proposed action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, Rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation:

The existing analysis is adequate for this proposal. There is no new information or circumstances since the DOI-BLM-LLAK010-2014-0001-EA was completed December 11, 2013, (or USDO BLM 2008a and USDO BLM 2012).

4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation:

The direct, indirect and site-specific impacts identified in DOI-BLM-LLAK010-2014-0001-EA are the same as would be anticipated for the proposed action because the only difference is the discharge of wastewater, which has been approved by the state. The Interdisciplinary Team that reviewed the proposal for the EA also reviewed the current proposal. The direct, indirect and cumulative effects of the proposed action are similar to those evaluated in the DOI-BLM-LLAK010-2014-0001-EA as well as USDO BLM 2008a and USDO BLM 2012.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Documentation of answer and explanation:

The proposed action will be announced on the BLM Arctic Field Office website NEPA register, as was the DOI-BLM-LLAK010-2014-0001-EA. No public comments were received on the announcement of the original EA.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Donna Wixon	Natural Resource Specialist	Project Lead
Dave Yokel	Wildlife Biologist	Wildlife
Matthew Whitman	Fisheries Biologist	Fisheries
Richard Kemnitz	Hydrologist	Hydrology
Stacie McIntosh	Supervisory Social Scientist	Archeology
Stacey Fritz	Anthropologist	Subsistence
Debbie Nigro	Wildlife Biologist	Wildlife
Susan Flora	Environmental Scientist	Air Quality, Waste
Roger Sayer	NEPA Specialist	

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM’s compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

/s/Donna Wixon, Project Lead, Arctic Field Office

/s/Roger Sayre, NEPA Coordinator, Arctic Field Office

/s/Lon Kelly, Manager, Arctic Field Office

March 3, 2014
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM’s internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.