United States Department of the Interior
Bureau of Land Management
Wells Field Office

FINDING OF NO SIGNIFICANT IMPACT

Marys River Oil and Gas Exploration Project – Environmental Assessment
DOI-BLM-NV-E030-2013-0007-EA

I have reviewed Environmental Assessment (EA), **DOI-BLM-NV-E030-2013-0007-EA**, prepared to analyze the Master Surface Use Plan of Operations (MSUPO) for the Marys River Oil and Gas Exploration Project proposed by Noble Energy, Inc. (Noble). After consideration of the environmental effects as described in the EA, and incorporated herein, I have determined that the Visual Alternative with the Project-specific Mitigation Measures identified in the EA will not significantly affect the quality of the human environment and that an Environmental Impact Statement (EIS) is not required.

I have determine the Visual Alternative is in conformance with the approved 1985 Wells Resource Management Plan and is consistent with the plans and policies of neighboring local, county, state, tribal, and federal agencies and governments. This finding and conclusion is based on my consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), both with regard to the context and the intensity of impacts described in the EA.

Context:
The Project is located in Elko County, Nevada, approximately 4 miles northwest of Wells and approximately 36 miles northeast of Elko on the north side of Interstate-80. The Project is a site-specific action directly involving oil and gas exploration on existing federal leases. Under the Visual Alternative, 27 potential well pad locations have been identified within the Project Area but no more than 20 well pad locations and associated access roads would be constructed. A 3D seismic program was conducted within the Project Area during the fall of 2012 that will determine which of the 27 well pads will be developed.

An oil production company drilled a single well in the Project Area in 2012. Other than the single well, there has not been recent oil and gas activity in the Project Area. Current land use in the Project Area includes: oil and gas development, mining, dispersed recreation, motorized recreation, hunting, camping, wildlife habitat, grazing, and agriculture. The area also provides habitat for greater sage-grouse and other sagebrush-obligate species. Several existing two-track roads traverse the Project Area and would be upgraded to provide access to selected well pads. Project-related direct and indirect impacts associated with construction would occur over a two or more year period and if wells prove economical, they may produce for over 20 years.

Intensity:

1) *Impacts that may be both beneficial and adverse.*

The EA has considered both beneficial and adverse impacts of the oil and gas exploration Project. In addition to the Project Design Features proposed by Noble, the EA further developed Project-specific Mitigation Measures. Such additional mitigation measures included in the EA by the BLM will be implemented to reduce potential impacts to air quality and climate, hydrology, invasive non-native species and noxious weeds, vegetation, migratory birds, special status species, wildlife and fisheries, cultural resources, the California National Historic Trail, Native American Traditional Values, paleontological resources, transportation and access, wastes, livestock grazing, recreation, land tenure and rights-of-way, fire management, and other uses. The analysis concludes that the Visual Alternative will not have a significant impact on any resource, particularly given the Design Features incorporated into the Visual Alternative and the BLM-assigned Project Specific Mitigation Measures that are included.

Benefits of the Project would include an increase in jobs over a two or more year period and the potential for production of up to 4,618,000 barrels of oil over 20 years, which would contribute to meeting the nation's energy demands. None of the environmental effects discussed in the EA are considered significant.

2) *The degree to which the proposed action affects public health or safety.*

Potential risks to public health and safety might occur from increased traffic traveling to, from, and within the Project Area. Impacts from traffic would be minimized by Project Design Features such as maintaining speed limits on paved roads and not exceeding 20 mph on unpaved roads, carpooling, and providing on-site accommodations for drill crews and other drilling personnel. Implementation of Noble's Transportation Plan would ensure that new and upgraded roads would be built for all-weather use, lessening the potential for damage to saturated soils, erosion, and inadvertent road widening.

Noble's plan to use Tier 2 drilling rig engines (reduced emissions) informed and supported BLM's development of an air emissions inventory. During the Construction/Drilling Phase, ambient air quality impacts would be localized within the area immediately surrounding the fugitive or point emissions source, with concentrations reducing substantially with distance from the source. Impacts would be temporary in nature. The relatively low single-well NO_x emission rate indicated that a drilling rig would demonstrate compliance with the 1-hour NO_2 ambient air quality standards. During the Operations/Production Phase, both individual well emission rates and field-wide predicted emission rates of NO_X and PM_{10}, the primary pollutants emitted, are at levels that will comply with ambient standards. As a result, production phase operations are expected to comply with the ambient air quality standards.

Site-specific Spill Prevention Plans and site-specific Stormwater Pollution Prevention Plans (as submitted with Applications for Permit to Drill) would detail measures required to reduce potential impacts to water quality. Noble has entered into an Memorandum of Understanding with the State of Nevada through the Nevada Division of Minerals, the Nevada Division of Environmental Protection, and the Board of Regents of the Nevada System of Higher Education

on behalf of the Desert Research Institute to establish the Aquifer Quality Assessment Program (Aqua Program) to gather and share data and information on groundwater and geological conditions associated with the fate and transport of chemicals used for hydraulic fracturing.

With implementation of the above measures, impacts to public health and safety are expected to be minimal.

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

The Project Area is representative of the Basin and Range of eastern Nevada in vegetative condition and ecological functionality. The most unique characteristic of the Project Area is its proximity to the California National Historic Trail.

Although soils in the Project Area are designated as Prime Farmland Soils and Farmland of Statewide Importance, none of the soils are irrigated or farmed and all soils are managed as rangelands and therefore, no impacts to Prime Farmland Soils or Farmlands of Statewide Importance would occur.

Newly recorded cultural resource properties have been be avoided, regardless of eligibility, by pad relocation and expanded survey of selected well pads and access roads. Segments of the previously recorded linear sites considered as contributing to eligibility have been avoided with a cultural resource buffer area of at least 100 feet.

Project activities would not occur within 400 feet of streams, creeks, springs, and wetland areas. Fueling would not occur within 400 feet of any riparian areas or standing or flowing surface waters including those at streams, ponds, springs, seeps, and stock reservoirs.

The following elements are not affected because they are not present in or near the Project Area: park lands and wild and scenic rivers.

None of the unique characteristics above would be significantly impacted, because Project Design Features and BLM assigned Project-specific Mitigation Measures would prevent or reduce any such effects to minor levels.

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

Exploration and production of leased federal oil and gas resources, including resultant effects, are not unique and have been taking place on federal lands for many decades. Decisions regarding utilization of public lands for well pads, wells, pipelines, and access roads have been and continue to be made by the BLM.

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

The Project is not unique or unusual. Oil and gas exploration has been ongoing for many years, during which the BLM has continued to consider and render similar decisions on similar actions. The BLM has experience implementing and mitigating comparable actions. Possible effects to the human environment are not predicted to be highly uncertain nor expected to involve 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.*

This decision is not precedent-setting. The Visual Alternative was considered in the context of past, present, and reasonably foreseeable actions. This decision is not unusual; no significant cumulative effects are predicted. This decision does not entail any known issues or elements that would create any precedent for future oil and gas exploration. The decision does not represent a decision in principle about a future consideration. No documentation by an EIS is required.

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

The Visual Alternative was considered in the context of past, present, and reasonably foreseeable actions. Cumulative impacts were brought forward and analyzed in the EA for every resource with issues of concern. The effects of the Visual Alternative were evaluated in addition to identified past, present, and reasonably foreseeable actions in the various cumulative effects study areas (CESAs). Based on the analysis in the EA, no significant cumulative impacts have been identified resulting from the implementation of the Visual Alternative.

8) *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP or may cause loss or destruction of significant scientific, cultural, or historical resources.*

A class III cultural survey was conducted where ground disturbing activities are proposed to occur. As a result, all eligible sites have been avoided by project design and no direct impacts to sites eligible for listing in the NRHP will occur. All sites that are eligible for the NRHP will be afforded a 50 meter buffer to prevent damage to any of these sites.

Portions of the California National Historic Trail and the Bishop Creek Spur (CNHT) occur within the Project Area. Initially, before including Project Design Features, the CNHT was expected to experience indirect adverse auditory and visual effects. However, under the Visual Alternative, the inclusion of Project Design Features, and off-site mitigation the indirect visual effects will not be significant.

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 ESA of 1973.*

No threatened or endangered species are known to inhabit the Project Area and there is no potential for the action to adversely affect them or their habitat. There are known BLM-sensitive animal species present within the Project Area which are identified in the EA. The BLM has prepared a Greater Sage-Grouse Management Plan and Noble has proposed BMPs for protection of greater sage-grouse and sage-grouse habitat. Noble has prepared a Bird and Bat Conservation Strategy which is designed to reduce the potential risks of bird and bat mortality. With implementation of the Project Design Features and BLM Project-specific Mitigation Measures included in Greater Sage-Grouse Management Plan, the Bird and Bat Conservation Strategy, and the BLM-assigned Mitigation Measures provided in the EA, effects to BLM-sensitive animal species would be avoided or minimized.

The EA includes a mitigation measure to determine if suitable substrate for Elko rockress (a BLM-sensitive species) is present prior to ground disturbance and if it is present, to conduct surveys for Elko rockcress and consult with the BLM if it is found. With implementation of this mitigation measure, potential effects to Elko rockcress would be minimized or avoided.

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

To the best of my knowledge, the Visual Alternative does not violate or threaten violation of any federal, state, or local law or requirement imposed for the protection of the environment.

/s/Bryan K. Fuell	6/5/2014
Bryan K. Fuell, Field Manager	Date