

**U.S. Department of the Interior  
Bureau of Land Management  
Little Snake Field Office  
455 Emerson Street  
Craig, CO 81625-1129**

## **CATEGORICAL EXCLUSION**

NUMBER: DOI-BLM-CO-N010-2014-0063-CX

CASEFILE/PROJECT NUMBER (optional): COC076665

PROJECT NAME: Grynberg Petroleum Company Proposed Shannon State #1 Injection Well

LEGAL DESCRIPTION: Moffat County  
Sixth Principal Meridian, Colorado  
T. 12 N., R. 101 W.,  
sec. 36, Lot 9.

APPLICANT: Jack Grynberg (Grynberg Petroleum Company)

BACKGROUND: The Bureau of Land Management (BLM) Little Snake Field Office (LSFO) received an application from Jack Grynberg on August 14, 2014 requesting authorization for a well pad and access road to inject produced water into the Shannon State #1 well.

According to the Colorado Oil & Gas Conservation Commission (COGCC) records, the Shannon State #1 well was drilled in 1958 and plugged. As of September 29, 2014 Grynberg Petroleum did not have approval from COGCC to re-enter the Shannon State #1 well and recomplete the Fort Union, Lance, Lewis, Wasatch formations and perform the down-hole work for the proposed disposal well. Grynberg Petroleum does not yet have an Underground Injection Control (UIC) permit. However, the UIC permit, which authorizes the injection well, cannot be obtained or approved by the COGCC until the down-hole work has been completed and the results have been submitted to COGCC for review.

DESCRIPTION OF PROPOSED ACTION: Grynberg Petroleum proposes to re-enter the Shannon State #1 well and recomplete the fort Union, Lance, Lewis, Wasatch formations and perform the down-hole work for the proposed disposal well. The anticipated injection volume is 1500 bbl/day.

This is a previously existing location (6.1 acres) that will be converted to a water injection well. The size of the proposed well pad is 60 feet X 60 feet. A short access road approximately 180 feet in length and 30 feet in width (0.1 acre) will be constructed from the existing access road to the proposed well pad.

Once conversion for injection is complete, the unused portion of the location will be re-contoured and re-seeded, and returned to its original condition.

No reserve pit will be constructed. All drilling waste will be contained in surface tanks.

LAND USE PLAN (LUP) CONFORMANCE REVIEW: The proposed action was reviewed for conformance (43 CFR 1610.5, BLM 1617.3) with the following plan:

Name of Plan: Little Snake Record of Decision and Resource Management Plan

Date Approved: October 2011

Results: The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP goals, objectives, and management decisions:

Allow for appropriate ROW routes and development sites, while identifying areas that will not be compatible with such use. Objectives for achieving these goals include:

- Provide access for the development of roads and trails, utilities, transmission lines, communication sites, and other uses in an environmentally responsible manner.
- Provide access for the development of oil and gas pipeline routes and other uses associated with oil and gas development in an environmentally responsible manner.

Section/Page: Section 2.17 Lands and Realty/ page RMP-52

CATEGORICAL EXCLUSION REVIEW: The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 43 CFR Part 46.210 and qualifies as a categorical exclusion under 516 DM 11.9E(12). This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The proposed action has been reviewed, and none of the extraordinary circumstances described in 43 CFR Part 46.215 applies:

Extraordinary Circumstances	YES	NO
1. Have significant adverse effects on public health and safety.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2)(E)].	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Establish a precedent for future action or represent a decision in	<input type="checkbox"/>	<input type="checkbox"/>

principle about future actions with potentially significant environmental effects.	<u>    X    </u>
6. Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.	<u>    X    </u>
7. Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by either the bureau or office.	<u>    X    </u>
8. Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species.	<u>    X    </u>
9. Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.	<u>    X    </u>
10. Have the potential for a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898).	<u>    X    </u>
11. Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007).	<u>    X    </u>
12. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).	<u>    X    </u>

INTERDISCIPLINARY REVIEW:

<u>Title</u>	<u>Resource</u>	<u>Date</u>
Archaeologist	Cultural Resources	10/18/2014
Rangeland Mgmt Spec	T&E Plants	10/6/2014
Wildlife Biologist	T&E Animals	10/6/2014

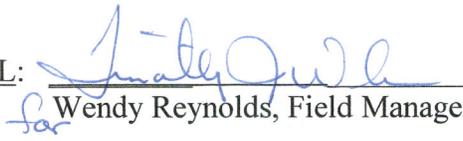
COMPLIANCE PLAN: The ROW will be checked for compliance with terms, conditions and stipulations on a five-year schedule. Responsibility for the compliance schedule and monitoring plan will be assigned to the Realty staff in the Little Snake Field Office. The primary inspector will be the Realty Specialist.

NAME OF PREPARER: Louise McMinn

NAME OF ENVIRONMENTAL COORDINATOR: *Cathy McLenstry* DATE: 5/13/15

COMPLIANCE WITH NEPA

This action is listed in the Department Manual (516 DM 2, Appendix 1 and 516 DM 11) as an action that may be categorically excluded. I have evaluated the action relative to the 12 criteria listed above and have determined that it does not represent an exception and is, therefore, categorically excluded from further environmental analysis.

SIGNATURE OF AUTHORIZED OFFICIAL:   
for Wendy Reynolds, Field Manager

DATE SIGNED: 5/18/15

Contact Person

For additional information concerning this decision, contact Louise McMinn, Realty Specialist, Little Snake Field Office, 455 Emerson Street, Craig, CO 81625, Phone (970) 826-5070.

Attachments: Exhibit A – Stipulations  
Exhibit B – Map

Exhibit A – Stipulations  
COC076665

1. The holder shall construct, operate, and maintain the facilities, improvements, and structures within this right-of-way in strict conformity with the plan(s) of development which was (were) approved and made part of the original grants. Any relocation, additional construction, or use that is not in accord with the approved plan(s) of development, shall not be initiated without the prior written approval of the authorized officer. A copy of the complete right-of-way grants, including all stipulations and approved plan(s) of development, shall be made available on the right-of-way area during construction, operation, and termination. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health and safety or the environment.
2. Any proposal involving surface disturbance, such as replacement, maintenance, or expansion, requires an application to the BLM for analysis, and authorization. New stipulations for construction would be applied to projects subject to the regulations and policies in existence at the time of authorization.
3. The right-of-way shall terminate without further action or notice on the part of this Bureau if at any time subsequent to its effective date, the facilities authorized are no longer necessary for the holder to service an active oil and gas well.
4. An archaeological site in need of further information to determine eligibility to the National Register of Historic Places is within the project's area of potential effect. Site 5MF6297 must be test excavated to determine whether or not it is eligible. If determined not eligible, the site need not be avoided by construction and reseeded operations. If determined eligible, the permit holder must either take measures to ensure the site is avoided or hire a BLM-permitted archaeologist to mitigate adverse effects to the site through salvage excavation. The avoidance option will require the R-O-W holder to hire a BLM-permitted archaeologist to relocate the site and coordinate with Grynberg employees to erect a series of metal T-posts spaced 10 feet apart between the site and the area of construction and reclamation to ensure the site is avoided.
5. Standard Stipulations to Protect Cultural Resources and Human Remains:
  - a. Pursuant to 43 CFR 10.4(g) the holder of this authorization or its contractor must notify the Authorized Officer (AO), by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), the holder must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
  - b. The operator or its contractor is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological remains are uncovered during any project or construction activity, the operator must stop work in the area of the discovery that might further disturb such materials, and immediately contact the AO. Within five working days the AO will inform the operator as to the mitigation measures the operator will likely have to undertake before the site can be used (assuming in place preservation is not necessary).

c. The holder shall notify the AO at least 180 days prior to non-emergency activities that would cause surface disturbance in the ROW. The BLM will determine if a cultural resource inventory, treatment, or mitigation is required.

d. A "Notice to Proceed" stipulation shall be required for any non-emergency activities as defined above that would cause surface disturbance on the ROW. Any request for a "Notice to Proceed" should be made to the AO, who shall review the proposed action for consistency with resource management concerns such as wildlife, big game winter range, paleontology, threatened and endangered species, and cultural resource protection. Additional measures may be required to protect these resources.

6. If fossils are discovered during construction or other operations, all activity in the area will cease and the Field Office Manager will be notified immediately. An assessment of significance will be made within an agreed timeframe. Operations will resume only upon written notification by the Authorized Officer.

7. The grant does not relieve you of your responsibility to obtain other required federal, state, or local permits.

8. Only produced water from Grynberg owned and operated wells on State Lease #7868-3 will be injected into this well, no third party waters will be allowed to be injected. Metering of the injected water will be done with barrel counters.

9. The tank battery will be surrounded by a dike or metal berm of sufficient capacity to contain 110% of the volume of the largest production tank. All loading lines and valves will be placed inside the berm surrounding the tank battery.

10. All permanent (on-site for six months or longer), above-ground structures constructed or installed on the well pad or within the pipeline corridor will be painted shale green and maintained through the life of the well. All structures will be painted within six months. Structures required to comply with OSHA (Occupational Safety and Health Act) will be excluded. and maintained through the life of the well.

11. Once in production, no excess equipment or drill pipe will be stored on location.

12. Provide the Authorized Officer with Geographic Information System (GIS) data to accurately locate and identify the well pad, access road, pipeline and all constructed infrastructure (as-built). Acceptable data formats are: (1) corrected global positioning system (GPS) files with sub-meter accuracy or better or, (2) ESRI shapefiles or geodatabases. Option 2 is preferred. Data must be submitted in NAD83. Data may be submitted as: (1) an email attachment: or (2) on a standard CD in compressed or uncompressed format. All data shall include metadata, for each submitted layer, that conforms to the Content Standards for Digital Geospatial Metadata from the Federal Geographic Data Committee standards.

13. No routine maintenance activities shall be performed during periods when the soil is too wet to adequately support construction equipment. If such equipment creates ruts in excess of three inches deep, the soil shall be deemed too wet to adequately support construction equipment.

14. Surface disturbance and vehicular travel will be limited to the approved location and approved access route. Any additional area needed will be approved in advance.

15. The Little Snake Field Office will be given 48-hour notification prior to commencing construction and/or reclamation work. Contact the Little Snake Field Office (970) 826-5000 to report work, which will commence.

#### 16. VEGETATION CLEARING:

Vegetation removal and the degree of surface disturbance will be minimized wherever possible.

[Example of site-specific requirement: During vegetation clearing activities, trees and woody vegetation removed from the well pad and access road will be moved aside prior to any soil disturbing activities. Care will be taken to avoid mixing soil with the trees and woody vegetation. Trees left for wood gathering will be cut (twelve inches or less from the ground), delimbed, and the trunks, six (6) inches or more in diameter will be removed and placed either by the uphill side of the access road, or moved to the end of the road, or to a road junction for easy access for wood gatherers and to reduce vehicle traffic on the wellpad. Trees with a trunk diameter less than six (6) inches and woody vegetation will be used to trap sediment, slow runoff, or scattered on reclaimed areas to stabilize slopes, control erosion, and improve visual resources.]

Retaining as much vegetative cover as possible during the project and/or reclaiming and covering disturbed areas shortly following excavation should help keep localized dust down during dry periods. Dust control measures, as approved by the BLM, will be applied as appropriate.

#### 17. TOPSOIL MANAGEMENT:

The top six (6) inches of soil material will be stripped and stockpiled around the perimeter of the well location to control run-on and run-off, and to make redistribution of topsoil more efficient during interim reclamation. The stockpiled soil will be reasonably free of brush and tree parts. Topsoil will be clearly segregated from excess spoil material.

- Earthwork for interim and final reclamation must be completed within 6 months of well completion or plugging (weather permitting).
- Salvaging and spreading topsoil will not be performed when the ground or topsoil is frozen or too wet to adequately support construction equipment. If such equipment creates ruts in excess of four (4) inches deep, the soil will be deemed too wet.
- No major depressions will be left that would trap water and cause ponding.
- When saturated soil conditions exist on or along the right-of-way, construction shall be halted until soil material dries out sufficiently for construction to proceed without undue damage and erosion to the right-of way.
- The operator shall provide satisfactory reclamation of all sites disturbed by their activity. This may include installation of additional erosion control devices and seeding at the discretion of the BLM Authorized Officer.
- Topsoil shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation. Topsoil shall only be used for reclamation and shall not be used to bed or pad the pipe during backfilling.
- To control erosion and sediment transport, roads shall be crowned or sloped, ditched, surfaced, drained with culverts and/or water dips, and constructed to BLM Gold Book standards or to engineered design if fragile soil properties exist. Culvert outlets shall incorporate controls such as rip-rap, sediment catchments, and anchored straw bales, to slow water velocity and prevent erosion and soil transport.
- The operator shall provide timely year-round road maintenance and cleanup on roads. A regular schedule for maintenance shall include, but not be limited to, crown or slope reconstruction, blading, ditch, culvert and catchment cleaning, road surface replacement, and dust abatement. When rutting within the traveled way becomes greater than three inches, blading, and/or gravelling shall be conducted as approved by the BLM Authorized Officer.
- Top soil segregation will not occur when soils are saturated or frozen unless special authorization is granted by the BLM Authorized Officer.
- All erosion and sediment control practices and measures shall be constructed, applied, and maintained in accordance with the approved erosion and sediment control plan.
- Topsoil stripping shall be confined to the immediate construction areas. A 4 to 6-inch stripping depth is common, but depth may vary depending on the particular soil. All perimeter dikes, basins, and other sediment controls shall be in place prior to stripping.

- Topsoil shall not be placed while in a frozen or muddy condition, when the subgrade is excessively wet, or in a condition that may otherwise be detrimental to proper grading or proposed sodding or seeding.

#### 18. SEEDING:

Seedbed Preparation. Initial seedbed preparation will consist of backfilling, leveling, and ripping all compacted areas to be seeded to a minimum depth of 18 inches with a minimum furrow spacing of 2 feet, followed by recontouring the surface and then evenly spreading the stockpiled topsoil. Prior to seeding, the seedbed will be scarified and left with a rough surface.

- Final seedbed preparation will consist of contour cultivating to a depth of 4 to 6 inches within 24-hours prior to seeding.
- Seed Application. Seeding will be conducted no more than 24 hours following completion of final seedbed preparation.
- The application rate shown in the table is based on 45 pure live seeds (PLS) per square foot, drillseeded to a depth of 0.25 to 0.5 inch. (However, brush species will be seeded during the winter on the ground surface or preferably on top of snow.) In areas that will not be drill-seeded, the seed mix will be broadcast-seeded at twice the application rate shown in the table and covered 0.25 to 0.5 inch deep with a harrow or drag bar or will be broadcast-seeded into imprints, such as fresh dozer cleat marks.
- No seeding will occur from May 15 to September 15. Fall seeding is preferred and will be conducted after September 15 and prior to ground freezing. Spring seeding will be conducted after the frost leaves the ground and no later than May 15.

#### 19. EROSION CONTROL & MULCHING:

Mulch, silt fencing, wattles, hay bales, and other erosion control devices will be used on areas at risk of soil movement from wind and water erosion.

- Mulch will be used if necessary to control erosion, create vegetation micro-sites, and retain soil moisture and may include hay, small-grain straw, wood fiber, live mulch, cotton, jute, or synthetic netting. Mulch will be free from mold, fungi, and certified free of noxious or invasive weed seeds.
- Straw mulch will contain fibers long enough to facilitate crimping and provide the greatest cover.

#### 20. MANAGEMENT OF INVASIVE, NOXIOUS, AND NON-NATIVE SPECIES:

All reclamation equipment will be cleaned prior to use to reduce the potential for introduction of noxious weeds or other undesirable non-native species.

- An intensive weed monitoring and control program will be implemented beginning the first growing season after interim and final reclamation.
- Monitoring will be conducted at least annually during the growing season to determine the presence of any State-listed noxious weeds. Noxious weeds that have been identified during monitoring will be promptly treated and controlled. A Pesticide Use Proposal (PUP) will be submitted to BLM for approval prior to the use of herbicides.

21. Drainage for runoff water will be provided to divert runoff water away from pits, cut portions of the well location and the topsoil stockpile. Runoff water that concentrates and forms channels on the well location will be diverted and/or dispersed to prevent erosion of the fill slopes. Any ditches designed to provide runoff drainage will be constructed on a minimal grade and will release water onto undisturbed ground without causing accelerated erosion. The operator will take additional measures if erosion is occurring within the runoff water drainage system.

22. The perimeter of production pits, if any, will be fenced with woven wire with 2 strands of barbed wire, properly spaced, on the top and all held in place by side posts and corner H-braces to inhibit entry by livestock and wildlife. The fence will be maintained until backfilling or removal of facilities occurs.

23. In the event downhole operations threaten to exceed the required 2-foot freeboard, regarding pit

fluids, immediate notification will be provided to the Authorized Officer with concurrent steps taken to minimize the introduction of additional fluids, until alternative containment methods can be approved.

24. Backfilling will be done in such a manner that the mud and associated solids will be confined to the pit and not squeezed out and incorporated in the surface materials.
25. There will be a minimum of 5 feet of cover (overburden) on the pit. In relatively flat areas the pit area will be slightly mounded to allow for settling and to promote surface drainage away from the backfilled pit.
26. When the work is completed, the pit areas will support the weight of heavy equipment without sinking and over time shall not subside over 6-inch depth.
27. In the event production is established, all land surfaces that are to remain free of vegetation (roads and well location) will be monitored for and protected from wind erosion; dry powdery soil will be treated to minimize wind erosion. The unused disturbed areas surrounding the well location will be re-contoured to appropriate confirmation as soon as possible. Some or all of the stockpiled topsoil will be evenly distributed over these re-contoured areas. Brush cleared prior to construction of the well site shall be scattered back over the re-contoured area.
28. Prior approval is required to remove pit fluids; a request of this type will need to include the destination of the fluids and if the destination is not a State approved facility, the request will include State approval of the destination.
29. If installed, production facilities will be located on cut portions of the existing drill pad.
30. In the event a producing well is established, all new production equipment which has open-vent exhaust systems, such as heater treaters, separators, dehydration units, and flare stacks, shall be designed and constructed to prevent birds and bats from entering or nesting in or on such units, and to the extent practical, to discourage birds from perching on the exhaust stacks.
31. A containment berm must be installed around all storage tanks, including temporary tanks. Compaction and construction of the berm surrounding the tank or tank battery will be designed to prevent lateral movement of fluids through the utilized materials, prior to storage of fluids. The berm must be constructed to contain at minimum 110 percent of the storage capacity of the largest tank within the berm. All loading lines will be placed inside the berm. All produced liquids must be contained, including the dehydrator vent/condensate line effluent.
32. All production facilities installed on location that have the potential to leak or spill oil, glycol, produced water, or other fluid, which may constitute a hazard to public health or safety, shall be placed within an appropriate secondary containment or diversionary structure. The structure shall hold 110% of the capacity the largest single tank in use and be impervious to any oil, glycol, produced water, or other toxic fluid for 72 hours. It shall be installed so that any spill or leakage would not drain, infiltrate, or otherwise escape to ground water, surface water, or navigable waters before cleanup is completed.
33. Install raptor perch deterrents on equipment, fences, cross arms and pole tops.
34. To prevent long term impacts associated with noise, sound producing equipment (such as compressors or pump jacks) must be equipped with a hospital grade muffler or similar device which limits sound emissions to 49 decibels or less measured 30 feet from the source. Mufflers will be pointed upward to dissipate potential vibration.

### 35. INTERIM RECLAMATION PRODEDURES:

#### Recontouring:

- The portions of the cleared well site not needed for operational and safety purposes will be recontoured to the original contour or to an interim contour that blends with the surrounding topography as much as possible. Sufficient level area will remain for setup of a workover rig and to park equipment. In some cases, rig anchors may need to be pulled and reset after recontouring to allow for maximum interim reclamation.
- If the well is a producer, the final cut and fill slopes prior to re-seeding will not be steeper than a 3:1 ratio, unless the adjacent native topography is steeper. Note: Construction slopes may be much steeper during drilling, but will be recontoured to the above ratios during interim reclamation.
- Roads and well production equipment, such as tanks, treaters, separators, vents, electrical boxes, and equipment associated with pipeline operation, will be placed on location so as to permit maximum interim reclamation of disturbed areas. If equipment is found to interfere with the proper interim reclamation of disturbed areas, the equipment will be moved so proper recontouring and revegetation can occur.

#### Application of Topsoil and Revegetation:

- Topsoil will be evenly respread and aggressively revegetated over the entire disturbed area not needed for all-weather operations including road cuts and fills and to within a few feet of the production facilities, unless an all-weather, surfaced, access route or small "teardrop" turnaround is needed on the well pad.
- In order to inspect and operate the well or complete workover operations, it may be necessary to drive, park, and operate equipment on restored, interim vegetation within the previously disturbed area. Damage to soils and interim vegetation will be repaired and reclaimed following use. To prevent soil compaction, under some situations, such as the presence of moist, clay soils, the vegetation and topsoil will be removed prior to workover operations and restored and reclaimed following workover operations.

### 36. VISUAL RESOURCES MITIGATION:

- Oil and gas operations will be subject to the range of mitigation practices noted on the BLM visual resource management (VRM) website: <http://www.blm.gov/nstc/VRM/>.
- Trees and vegetation will be left along the edges of the pads to provide screening.
- To help mitigate the contrast of recontoured slopes, reclamation will include measures to feather cleared lines of vegetation and to save and redistribute cleared trees, debris, and rock over recontoured cut and fill slopes.
- To reduce the view of production facilities from visibility corridors and private residences, facilities will not be placed in visually exposed locations (such as ridgelines and hilltops).
- Production facilities will be clustered and placed away from cut slopes and fill slopes to allow the maximum recontouring of cut and fill slopes.
- All long-term above ground structures will be painted an appropriate color from the BLM "Supplemental Environmental Colors" chart to blend with the natural color of the landscape background. (Shale Green)
- Visually mitigate all surface disturbance activity back to the integrity of the VRI scenic quality rating.

### 37. FINAL RECLAMATION PRODEDURES:

- Final reclamation actions will be completed within 6 months of well plugging.
- All disturbed areas, including roads, pipelines, pads, production facilities, and interim reclaimed areas will be recontoured to the contour existing prior to initial construction or a contour that blends indistinguishably with the surrounding landscape. Resalvaged topsoil will be respread evenly over the entire disturbed site to ensure successful revegetation. To help mitigate the contrast of recontoured slopes, reclamation will include measures to feather cleared lines of vegetation and to save and redistribute cleared trees, woody debris, and large rocks over recontoured cut and fill slopes.

- Water breaks and terracing of the site will only be installed when absolutely necessary to prevent erosion of fill material. Water breaks and terracing are not permanent features and will be removed and reseeded when the rest of the site is successfully revegetated and stabilized.
- If necessary to ensure timely revegetation, the pad will be fenced to BLM standards to exclude livestock grazing for the first two growing seasons or until seeded species become firmly established, whichever comes later. Fencing will meet standards found on page 18 of the Gold Book, 4th Edition, or will be fenced with operational electric fencing.
- Final abandonment of pipelines and flow lines will involve flushing and properly disposing of any fluids in the lines. All surface lines and any lines that are buried close to the surface that may become exposed in the foreseeable future due to water or wind erosion, soil movement, or anticipated subsequent use, must be removed. Deeply buried lines may remain in place unless otherwise directed by the authorized officer.

### 38. MONITORING AND FINAL ABANDONMENT APPROVAL:

- Reclaimed areas will be monitored annually. Actions will be taken to ensure that reclamation standards are met as quickly as reasonably practical.
- Reclamation monitoring will be documented in an annual reclamation report submitted to the Authorized Officer by December 31. The report will document compliance with all aspects of the reclamation objectives and standards, identify whether the reclamation objectives and standards are likely to be achieved in the near future without additional actions, and identify actions that have been or will be taken to meet the objectives and standards. The report will also include acreage figures for Initial Disturbed Acres, Successful Interim Reclaimed Acres, and Successful Final Reclaimed Acres. Annual reports will not be submitted for sites approved by the Authorized Officer in writing as having met interim or final reclamation standards. Any time 30 percent or more of a reclaimed area is redisturbed, monitoring will be reinitiated. The Authorized Officer will be informed when reclamation has been completed, is successful, and the site is ready for final inspection.

### 39. RECLAMATION PERFORMANCE STANDARDS:

#### Interim Reclamation Standard:

- Disturbed areas not needed for long-term production operations or vehicle travel have been recontoured, protected from erosion, and revegetated with a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community sufficient to minimize visual impacts, provide forage, stabilize soils, and impede the invasion of noxious weeds.

#### Final Reclamation Standard:

The original landform has been restored for all disturbed areas including well pads, production facilities, roads, pipelines, and utility corridors.

- A self-sustaining, vigorous, diverse, native (or otherwise approved) plant community is established on the site, with a density sufficient to control erosion and non-native plant invasion and can reestablish wildlife habitat or forage production. At a minimum, the established plant community will consist of species included in the seed mix and/or desirable species occurring in the surrounding natural vegetation. No single species will account for more than 30 percent total vegetative composition unless it is evident at higher levels in the adjacent landscape. Permanent vegetative cover will be determined successful when the basal cover of desirable perennial species is at least 80 percent of the basal cover of the adjacent undisturbed area. Plants must be resilient as evidenced by well-developed root systems and flowers. Shrubs must be well established and in a "young" age class at a minimum (therefore, not comprised mainly of seedlings that may not survive until the following year).
- In agricultural areas, irrigation systems and soil conditions are reestablished in such a way as to ensure successful cultivation and harvesting of crops.
- Erosion features are equal to or less than surrounding area and erosion control is sufficient so that water naturally infiltrates into the soil and gullying, headcutting, slumping, and deep or excessive rilling (greater than 3 inches) is not observed.

- The site is free of State- or county-listed noxious weeds, oil field debris and equipment, and contaminated soil. [Example of site-specific requirement: Given that cheatgrass is common in portions of the Project Area, it may not be possible to totally eliminate this invasive species from the reclaimed area. In the case of cheatgrass, interim reclamation will be considered acceptable if cheatgrass and other undesirable vegetation are less than five percent cover, if the adjacent vegetation is less than 50 percent undesirables. Cheatgrass will be less than 50 percent cover if the adjacent vegetation is more than 50 percent undesirable species.]

- The final inspection for final reclamation success and approval for final abandonment will be subject to an interdisciplinary review. An interdisciplinary team consisting of, at a minimum, a wildlife biologist, a rangeland management specialist, and a natural resources specialist will evaluate the reclamation against the performance standards and provide the authorized officer with a recommendation as to whether or not objectives have been met.

40. The holder shall inform the authorized officer within 48 hours of any accidents on federal lands that require reporting to the Department of Transportation as required by 49 CFR Part 195.

41. All authorized users of public lands are expected to know and comply with regulations governing the storage, handling, application (including licensing of applicators), and disposal of hazardous substances. Application of herbicides must be under field supervision of an Environmental Protection Agency (EPA) certified pesticide applicator. Herbicides must be registered by the EPA and application proposals must be approved by the BLM.

42. As a reasonable and prudent right-of-way holder, acting in good faith, the holder will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the Bureau of Land Management's Little Snake Field Office at (970) 826-5000.

43. As a reasonable and prudent right-of-way holder, acting in good faith, the holder will provide for the immediate clean-up and testing of air, water, (surface and/or ground) and soils contaminated by the emission or release of any substances that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the holder fails, refuses or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground) and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the Bureau of Land Management's Little Snake Field Office may take measures to clean-up and test air, water (surface and/or ground) and soils at the holder's expense. Such action will not relieve the holder of any liability or responsibility.

44. The holder of this right-of-way agrees to indemnify the United States against any liability arising from the release of any hazardous substance or hazardous waste (as these terms are defined in the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C 9601, et.seq. or the Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901, et. seq.) on the right-of-way (unless the release or threatened release is wholly unrelated to the right-of-way holder's activity on the right-of-way). This agreement applies without regard to whether a release is caused by the holder, its agent, or unrelated third parties.

45. No hazardous materials/waste or trash shall be disposed of on the public lands. If a release does occur, it shall be reported to the Little Snake Field Office immediately (970) 826-5000. Any spills will be cleaned up to applicable standards.

46. The holder(s) shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated. In any event, the holder(s) shall comply with the Toxic Substances Control Act of 1976, as amended (15 U.S.C. 2601, et seq.) with regard to any toxic substances that are used, generated

by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980, Section 102b. A copy of any report required or requested by any Federal agency or State government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency or State government.

47. The holder shall perform any remediation requirements in an active and diligent manner. If remediation is not completed within a reasonable time frame, the holder shall investigate the cause and shall take all necessary steps to enhance the remediation process or shall dispose of the material at an approved Treatment, Storage, and Disposal Facility.

48. The site shall be maintained in a sanitary condition at all times; waste materials at those sites shall be disposed of promptly at an appropriate waste disposal site. 'Waste' means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

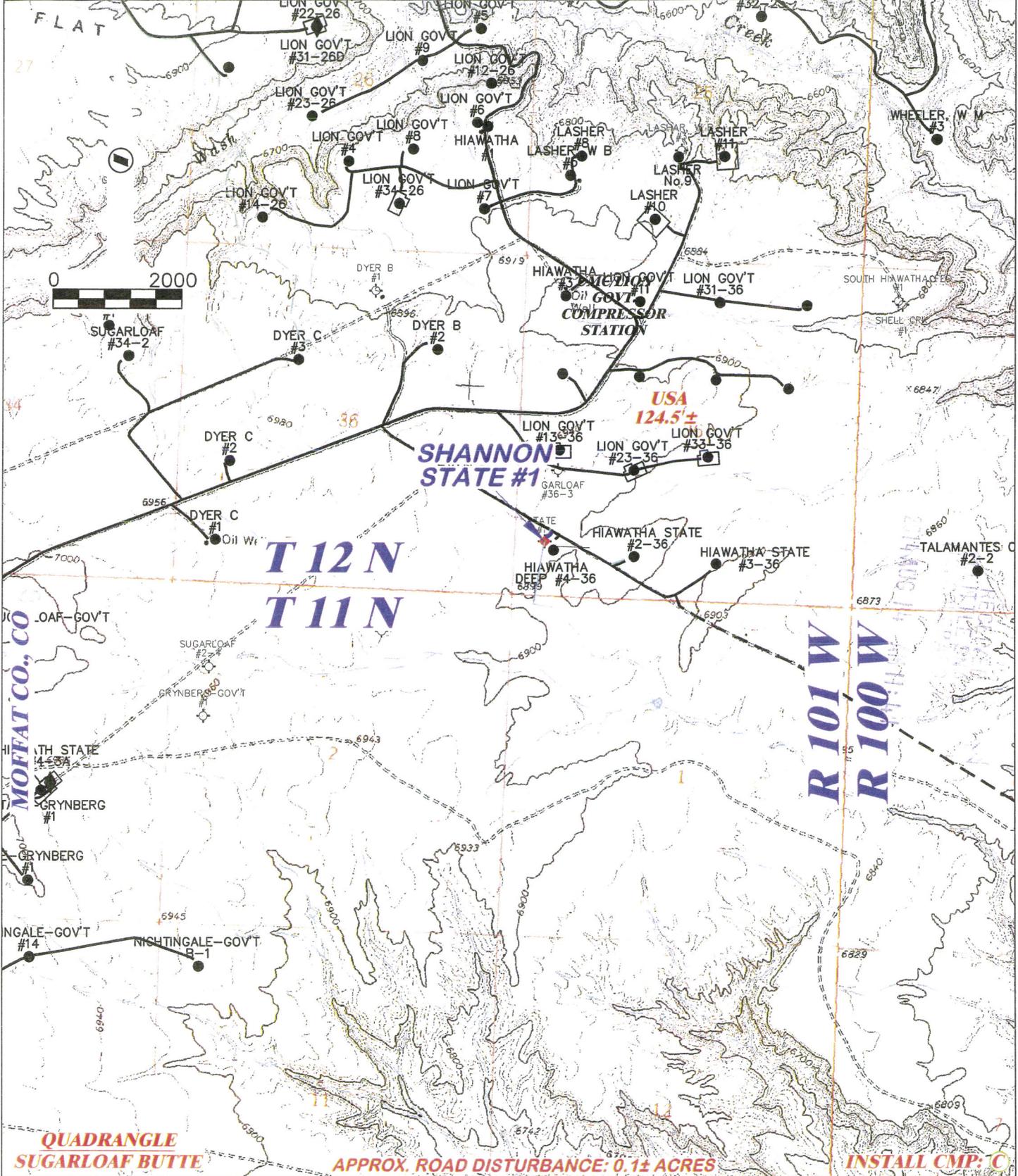
49. Appropriate signs will be installed for identifying the location. Install warning signs indicating location, company name, and emergency telephone number.

50. Utilize the "One Call" system to locate and stake the centerline and limits of all underground facilities in the area of proposed excavations.

51. Provide 48 hour notification to the owner/operator of facilities prior to performing any work within 10 feet of buried or above ground pipelines.

52. Additional mitigative measures will be employed to prevent or reduce accelerated erosion if it begins to occur within or on constructed drainage and diversion ditches or surface drainages affected by the facility.

53. Prior to termination of the right-of-way, the holder shall contact the authorized officer to arrange a pretermination conference. This conference will be held to review the termination provisions of the permit.



 <b>DRG RIFFIN &amp; ASSOCIATES, INC.</b> (307) 362-5028 1414 ELK ST., ROCK SPRINGS, WY 82901		<b>PROPOSED ACCESS MAP</b> <b>GRYNBERG PETROLEUM CO.</b> <b>SHANNON STATE #1</b> <b>SECTION 36, T12N, R101W, 6th P.M. MOFFAT COUNTY, COLORADO</b>	
		TOTAL PROPOSED LENGTH: 124.5±	
DRAWN: 3/31/14 - TMH REVISED: NA	SCALE: 1" = 2000' DRG JOB No. 20478 EXHIBIT 4	PROPOSED ROAD  EXISTING ROAD 	