

U.S. Department of the Interior  
Bureau of Land Management  
White River Field Office  
220 E Market St  
Meeker, CO 81641

## FINDING OF NO SIGNIFICANT IMPACT (FONSI)

### *Temporary Access and Staging Area for the Black Diamond Mine Fire Excavation Abatement Project*

**DOI-BLM-CO-N05-2015-0038-EA**

#### **Background**

The Colorado Division of Reclamation, Mining, and Safety (DRMS), as part of their Abandoned Mine Land Program, identified coal seam fires throughout the state and is working on abatement of these coal seam fires. One of DRMS's proposals is the Black Diamond Mine Fire Abatement project located on an isolated private parcel surrounded by the BLM managed lands (Figures 1 and 2) approximately one mile northwest of Meeker, Colorado. Their proposed project would require access through BLM managed lands. Records indicate the mine was in operation from 1916 until 1930 when the mine fire was discovered. The burning coal seam has two main surface expression in the vicinity of collapsed mine entries and has been responsible for fire starts in the past. Previous attempts to surface seal the fire have been unsuccessful.

DRMS is proposing to excavate the mine entries, quench all burning materials, and seal the portals to reduce/eliminate the surface expression of the fire. The excavated areas would be on private land and graded following dig/quench operations. Hydrologic controls would be constructed, and the site would be re-vegetated. The temporary access road would be re-contoured and reseed upon completion of the project. Commencement of the project is expected to be the first of September 2015 and completed by the end of October 2015. The project would directly involve six acres of which three acres would be available as a staging area for water storage to quench the coal and associated construction equipment, materials, and trailer. No vegetation removal would occur within the staging area. The remaining three acres (two acres on BLM and one acre on private lands) are associated with the construction of the temporary access would be a short term disturbance.

#### **Finding of No Significant Impact**

Based upon a review of the EA and the supporting documents, I have determined that the Proposed Action will not have a significant effect on the quality of the human environment,

individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity, as defined at 40 CFR 1508.27 and do not exceed those effects as described in the White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement (1996). Therefore, an environmental impact statement is not required. This finding is based on the context and intensity of the project as described below.

### ***Context***

The project is a site-specific action directly involving BLM administered public lands that do not in and of itself have international, national, regional, or state-wide importance.

No vegetation removal would occur within the staging area. The remaining three acres associated with the construction of the temporary access would be a short term disturbance. There would be no long term ground disturbance of BLM lands. There is currently no public vehicular access to the site of the burning coal seam. Public use of nearby lands is mostly limited to four miles of a constructed mountain biking and hiking trail system which comes within 0.4 miles of the burning seam. Temporary access would be routed along approximately 0.50 miles of yet to be constructed Trail 1 of the Meeker Master Trails Plan. Reclamation efforts would be made to maintain the proper grade and alignment for this portion of Trail 1. Duration of the project is expected to be approximately two months. No significant negative effects were identified in the analysis of the impacts associated with the project.

### ***Intensity***

The following discussion is organized around the 10 Significance Criteria described at 40 CFR 1508.27. The following have been considered in evaluating intensity for this Proposed Action:

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

Construction of the access would have short term adverse impacts to soil, hydrology, vegetation, and recreation. These short term impacts would likely be remediated within two months to three years of project commencement. Beneficial impacts include the following:

- Reduction/elimination of wildfire starts caused by the surface expression the burning coal seam;
- Reduction/elimination emissions of greenhouse gases including carbon dioxide and methane as well as mercury, carbon monoxide, and other toxic substances;
- Reduction in the construction cost of approximately 0.5 miles of Trail 1 of the Meeker Master Trails Plan.

#### **2. The degree to which the Proposed Action affects public health or safety.**

The Proposed Action would improve public health and safety by reducing/eliminating the surface expression of the coal seam fire; removing a potential source of wild fire ignition in near proximity of a populated area; and by reducing/eliminating emissions of greenhouse gases including carbon dioxide and methane as well as mercury, carbon monoxide, and other toxic substances. Temporary access would not be available to the general public during project and would be re-contoured and reclaimed upon completion of the two month project.

**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.**

Cultural resource inventories of the area yielded no historic properties in the project area that would be adversely affected by the proposed action. There are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas that are in the project area.

**4. Degree to which the possible effects on the quality of the human environment are likely to be highly controversial.**

No comments or concerns have been received regarding possible effects on the quality of the human environment during scoping. It is likely the quality of human environment would improve with the reduction/elimination the surface expression of the coal seam.

**5. Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risk.**

No highly uncertain or unknown risks to the human environment were identified during analysis of the Proposed Action.

**6. 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.**

The Proposed Action neither establishes a precedent for future BLM actions with significant effects nor represents a decision in principle about a future consideration. The objective of fire management in the 1997 White River ROD/RMP includes the protection of public health, safety, and property.

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

The Proposed Action would occur in association with the development of the Meeker Master Trails Plan. Combination of these projects is not considered a significant impact to any resource or the human environment

**8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.**

The Proposed Action would not adversely affect districts, sites, highways, structures or objects listed on the National Register of Historic Places. Cultural resource inventories of the area yielded no historic properties in the project area that would be adversely affected by the proposed action. There would be no impact to paleontological resources with the BLM required mitigation measures for the project.

**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 (ESA) of 1973.**

There are no threatened or endangered animal species that are known to inhabit or derive important use from the project area. There are no special status plant species or plant species

habitat present in the vicinity of the proposed action. Water used for the quenching operations would result in the depletion of an estimated 0.34 acre-feet of water from within the Colorado River Basin and would fall under BLM Colorado's Programmatic Biological Assessment (PBA) for water depleting activities (excluding fluid minerals development) on BLM lands in the Colorado River basin in Colorado (BLM 2008).

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

Neither the Proposed Action nor impacts associated with it violate any laws or requirements imposed for the protection of the environment.

**Signature of Authorized Official**

  
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Field Manager

  
\_\_\_\_\_

Date

U.S. Department of the Interior  
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## DECISION RECORD

### ***Temporary Access and Staging Area for the Black Diamond Mine Fire Excavation Abatement Project***

**DOI-BLM-CO-N05-2015-0038-EA**

#### **Decision**

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-N05-2015-0038-EA, authorizing the construction, maintenance, and reclamation of temporary access and staging area for the abate of the Black Diamond Mine coal seam fire located on private lands.

#### ***Applicant Committed Design Features***

##### **Sediment Controls:**

1. DRMS includes sediment and erosion controls as a pay item in all construction bids. Sediment controls would be implemented in all areas along the access road and construction areas to limit or eliminate sediment run-off and erosion throughout the duration of reclamation activities and post reclamation revegetation.
  - a. ***Temporary Sediment Controls:***
    - i. ***Ertec S-Fence (14"):*** along road cut margins, steep slope areas, and areas devoid of vegetation. It is used in place of traditional silt fence.
    - ii. ***Straw Wattles:*** All straw Wattles would be certified Weed Free. Straw wattles would be placed where appropriate, likely along contour in steep slope graded areas, margins of the road following reclamation, and along the base of soil stockpiles.
    - iii. ***Water Bars:*** Water bars would be utilized where possible along the access road to shed water away from and reduce erosion and maintenance needs of the road.
    - iv. ***Swales:*** Swales would be utilized where necessary to shed water away from soil stockpiles and delicate portions of the access road.
  - b. ***Permanent Sediment Controls:***
    - i. ***Surface Roughening:*** The surface of all disturbed areas would be severely roughened using the bucket of the excavator. Surface roughening, utilized

in conjunction with re-vegetation methods (seeding and crimping of straw mulch) is an efficient method for establishing vegetation microclimates, and collecting sediment and surface water run-off. Following completion of surface roughening, the site is difficult to walk on, with ridges and valleys one to two feet deep. The access road would be roughened, with the exception of the existing two-track areas (unless otherwise directed by the BLM), and the portions of the road that would become trail following project completion.

- ii. *Rip-Rap*: Rip-rap would be utilized in a few small areas to enhance the final grade and create fire line breaks near the surface expression of the fire (private land). Large boulders may also be utilized within graded areas to create a secure, varying landscape. Rip-rap would not be widely utilized for this project. All rock would be obtained within the project area.

#### **Fire Prevention:**

2. This project would have the potential to ignite surface fuels, due to the excavation of burning materials. To prevent surface fires, all excavated coal and surrounding rock, with a surface temperature greater than 100 degrees Fahrenheit (F), would be quenched with a firefighting foam/water mixture. Excavated rock and coal would be cooled to less than 100 degrees F prior to backfill and final grading of excavated and quenched materials. Additionally, all construction crews would have, at a minimum, two five pound Class A fire extinguishers. Additionally, each crew member would be supplied with one sharpened round nosed shovel. These items would be immediately available to the crew members for use should an uncontrolled ignition occur. The BLM and Meeker Fire Response Teams would have access to the site and road throughout the duration of construction.
3. When working on lands administered by the BLM WRFO, notify Craig Interagency Dispatch (970-826-5037) in the event of any fire.
  - a. The reporting party would inform the dispatch center of fire location, size, status, smoke color, aspect, fuel type, and provide their contact information.

#### **Access Road Reclamation:**

4. DRMS would work with the BLM to determine which portions of the road would be reclaimed following completion of the project in order to help facilitate proposed BLM trail making efforts. All new road construction would be removed, and the road surface would be returned to its pre-disturbance grade utilizing the permanent and temporary sediment controls outlined above. The road would be graded, roughened, and revegetated using a site specific, BLM approved seed mix. Topsoil stockpiled during road construction would be placed for the final revegetation surface. Revegetation methods would include surface roughening, amendment application of compost and/or organic fertilizer, seeding with a site specific seed mix, recommended by the BLM, and application of two tons per acre of certified weed free straw mulch, crimped into the surface. A cover crop of sterile barley or wheat would likely be seeded to provide ground cover and provide competition for noxious weed species during vegetation establishment.

DRMS is amenable to establishing the trail dimensions and grade, where applicable, and to be determined by the BLM.

**Monitoring and Maintenance:**

5. Monitoring of final grade and revegetation effectiveness would occur in the spring of 2016, and continue until the site is deemed stable. Weed control would occur, where necessary, along the access road disturbance. Weed control would be contracted, by DRMS, to a BLM approved weed control contractor. DRMS would complete the necessary maintenance on the access road disturbance until the site is stable and sustainable.

***BLM Required Conditions of Approval to Mitigate Impacts to Cultural and Paleontological Resources***

6. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
7. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. The applicant will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. The applicant, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
8. Pursuant to 43 CFR 10.4(g), the applicant must notify the AO, by telephone and 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 operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
9. The applicant is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for disturbing or collecting vertebrate or other scientifically-important fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands.
10. If any paleontological resources are discovered as a result of operations under this authorization, the applicant or any of his agents must stop work immediately at that site, immediately contact the BLM Paleontology Coordinator, and make every effort to protect

the site from further impacts, including looting, erosion, or other human or natural damage. Work may not resume at that location until approved by the AO. The BLM or designated paleontologist will evaluate the discovery and take action to protect or remove the resource within 10 working days. Within 10 days, the operator will be allowed to continue construction through the site, or will be given the choice of either (a) following the Paleontology Coordinator's instructions for stabilizing the fossil resource in place and avoiding further disturbance to the fossil resource, or (b) following the Paleontology Coordinator's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

### **Mitigation Measures**

#### **Soil Resources**

11. Given the temporary nature of the road, the backslope grade should be as steep as the soil material would permit. A backslope of ½:1 to ¾:1 should be adequate.

#### **Hydrology**

12. Earthwork Design: When feasible, a balanced road design is encouraged. Refer to BLM's Primitive Road Design Handbook (H-9115-1).
13. In order to divert water from road surface, the incorporation of grade dips should be utilized to prevent pooling and rilling on the road surface. Dip spacing is dependent on road grade and should comply with the BLM's Primitive Road Design Handbook (H-9115-1) with spacing approximately every 300 feet.

#### **Vegetation**

14. For reclamation of disturbed areas BLM recommends the following seed mix:

<b>Cultivar</b>	<b>Common Name</b>	<b>Scientific Name</b>	<b>Application Rate (lbs PLS/acre)</b>
Arriba	Western Wheatgrass	<i>Pascopyrum smithii</i>	4
Rimrock	Indian Ricegrass	<i>Achnatherum hymenoides</i>	3.5
Whitmar	Bluebunch Wheatgrass	<i>Pseudoroegneria spicata</i> ssp. <i>inermis</i>	4
Lodorm	Green Needlegrass	<i>Nassella viridula</i>	2.5
See alternate*	Sulphur Flower Buckwheat	<i>Eriogonum umbellatum</i>	1.5

\*Arrowleaf Balsamroot (*Balsamorhiza sagittata*) may be substituted for the Sulphur Flower Buckwheat

15. If straw is used to mulch reclaimed areas it must be certified weed-free and special attention should be paid to watch for and treat any weed species, especially jointed goatgrass (*Aegilops cylindrica*) that might have been introduced with the straw. Because of recent accidental introductions of jointed goatgrass with the use of straw mulch during reclamation activities, the BLM recommends using a different mulch product such as woodstraw or mulching with chipped material removed during route construction.

16. After recontouring, seedbed preparation and seeding, stockpiled woody material should be scattered across the reclaimed area where the material originated. Chipped material should be scattered across reclaimed areas in a manner that avoids developing a thick mulch layer that would suppress growth of desirable vegetation.
17. Trees or shrubs that must be removed for access route construction must be cut down or masticated to a stump height of six inches or less prior to other heavy equipment operation. Woody materials required for reclamation would be stockpiled and stored separately from stockpiled topsoil and may be positioned along the margins of the access route. Smaller limbs and trees may be chipped and stockpiled if needed for reclamation or may be placed back on the reclaimed surface whole. Boles, limbs, and other large woody material should be retained for redistribution not to exceed 30 to 40 percent total ground cover.
18. To be deemed successful, reclamation of the access route must result in a self-sustaining plant community of at least five desirable plant species where no one species exceeds 70 percent relative cover. Desired foliar cover, bare ground, and shrub and/or forb density must have 80 percent similarity in relation to the identified range site in an early-seral (herbaceous) condition.
19. Reclaimed areas must be free of noxious and undesirable invasive weeds, construction debris, and trash.
20. Soils must be stabilized to a point where there is no evidence of excessive erosion such as slope or soil instability, subsidence, or slumping on any of the reclaimed access route (as compared to the range site description).
21. All equipment that may act as a vector for weeds would be cleaned before entering the WRFO.

#### **Invasive, Non-Native Species**

22. Application of herbicides must comply with the *Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environments Impact Statement* (EIS), and the WRFO Integrated Weed Management Plan (DOI-BLM-CO-110-2010-0005-EA).
23. All seed, straw, mulch, or other vegetative material to be used on BLM and split-estate lands will comply with United States Department of Agriculture (USDA) state noxious weed seed requirements and must be certified by a qualified Federal, State, or county office as free of noxious weeds. Any seed lot with test results showing presence of State of Colorado A or B list species will be rejected in its entirety and a new tested lot will be used instead.
24. All areas identified to be disturbed under this proposal will be monitored and treated for noxious weeds on an annual basis until final reclamation has been approved by the Authorized Officer.
25. Pesticide Use Proposals (PUPs) must be submitted to and approved by the BLM before applying herbicides on BLM lands. The PUP will include target weed species, the herbicides to be used, application rates and timeframes, estimated acres to be treated, as well as maps depicting the areas to be treated and known locations of weeds. The WRFO

recommends that all PUPs be submitted no later than March 1<sup>st</sup> of the year anticipating herbicide application.

26. Pesticide Application Reports (PAR) will be provided to the BLM annually, usually in the fall at the end of annual weed treatment. The PAR will include operator name, PUP number, applicator name(s), application date, timeframe of application, location of application, type of equipment used, pesticide used including manufacturer and trade name, formulation, application rate in terms of active ingredient per acre, acres treated, primary species treated, stage of plant development, and weather conditions during treatment.

### **Wildlife**

27. Construction activities associated with the Proposed Action (i.e., road construction, fire abatement activities etc.) will be conducted outside the migratory bird nesting season of May 15 through July 15.
28. Construction activities will not be allowed from December 1 Through April 30 to avoid disturbance to big game during the critical winter use period.
29. A raptor survey will be conducted by WRFO wildlife staff the breeding season prior to road construction. If an active nest is located, no construction activities will be permitted within 0.25 miles (400 meters) of the nest from February 1 through August 15 or until young have fledged. Construction activities will be allowed from August 16 through January 31. Should a nest be located along or in close proximity (50 meters) to the proposed road, a re-route of the road may be necessary.

### **Access and Transportation**

30. DRMS will perform road maintenance on BLM Road 1602A and a short portion of BLM Road 1603 after the project has been completed in order to return these roads to their former condition.
31. Use of BLM Roads 1602A and 1603 shall cease when soils or roads surfaces become saturated to a depth of three inches unless approved by the Authorized Officer.

### **Hazardous or Solid Wastes**

32. Comply with all Federal, State and/or local laws, rules and regulations addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment. All spills or leakages of oil, gas, produced water, toxic liquids or waste materials, blowouts, fires, shall be reported by the operator in accordance with the regulations and as prescribed in applicable orders or notices.
33. Where required by law or regulation to develop a plan for the prevention of releases or the recovery of a release of any substance that poses a risk of harm to human health or the environment, provide a current copy of said plan to the BLM WRFO.
34. All substances that pose a risk of harm to human health or the environment shall be stored in appropriate containers. Fluids that pose a risk of harm to human health or the environment, including but not limited to produced water, shall be stored in appropriate containers and in secondary containment systems at 110 percent of the largest vessel's

- capacity. Secondary fluid containment systems, including but not limited to tank batteries shall be lined with a minimum 24 mil impermeable liner.
35. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials 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.
  36. As a reasonable and prudent lessee, acting in good faith, all lessees and right-of-way holders 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 BLM WRFO (970) 878-3800.
  37. As a reasonable and prudent right-of-way holder, acting in good faith, all lessees and right-of-way holders 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 substance 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 lessee/operator or right-of-way 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 BLM WRFO may take measures to clean-up and test air, water (surface and/or ground) and soils at the lessee/operator's expense. Such action will not relieve the lessee/operator of any liability or responsibility.

#### **General**

38. The BLM Mining Engineer, Paul Daggett will be notified via email or phone ([pdaggett@blm.gov](mailto:pdaggett@blm.gov), 970-878-3819) 24 hours prior to contractor onsite and subsequent commencement of activities.

### **Compliance with Laws & Conformance with the Land Use Plan**

This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

### **Environmental Analysis and Finding of No Significant Impact**

The Proposed Action was analyzed in DOI-BLM-N05-2015-0038-EA and it was found to have no significant impacts, thus an EIS is not required.

### **Public Involvement**

This project was posted on the WRFO's on-line ePlanning National Environmental Policy Act (NEPA) register on February 5, 2015.

The EA and the unsigned Finding of No Significant Impact (FONSI) were available for a 14-day public review and comment beginning April 20, 2015 and ending May 4, 2015.

One individual responded to the BLM as a result of the comment period; see Appendix B of the EA for the comment and the BLM's response.

## **Monitoring and Compliance**

On-going compliance inspections and monitoring will be conducted by White River Field Office staff during project duration and until satisfactory site reclamation. Specific mitigation will be followed. The applicant will be notified of compliance related issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

## **Rationale**

Analysis of the Proposed Action has concluded that there are no significant negative impacts and that it meets Colorado Standards for Public Land Health. The Proposed Action would have short term adverse impacts to soil, hydrology, vegetation, and recreation that would likely be remediated within two months to three years of project commencement. Beneficial impacts of implementing the Proposed Action would include the following:

- Reduction/elimination of wildfire starts caused by the surface expression the burning coal seam;
- Reduction/elimination emissions of greenhouse gases released from the burning of the coal seam. These gases include carbon dioxide , methane, carbon monoxide, as well as mercury, and other toxic substances; and
- Reduction in the construction cost of approximately 0.5 miles of Trail 1 of the Meeker Master Trails Plan.

## **Administrative Remedies**

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 Code of Federal Regulation (CFR), Part 4.400 and Form 1842-1. If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days from date of publication this decision. The appellant has the burden of showing that the Decision appealed from is in error. If you wish to file a petition for a stay of the effectiveness of this Decision during the time that your appeal is being reviewed by the Board, the petition for stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. A copy of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals (IBLA) and to the appropriate Office of the Solicitor (see 43 CFR4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

### **Standards for obtaining a stay**

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied;
2. The likelihood of the appellant's success of the merits;
3. The likelihood of immediate and irreparable harm if the stay is not granted, and;

4. Whether the public interest favors granting the stay.

**Signature of Authorized Official**

*Hunt C. Walther*

Field Manager

*05/15/2015*

Date

