

**United States Department of the Interior
Bureau of Land Management**

**Determination of NEPA Adequacy
DOI-BLM-UT-Y010-2015-0210-DNA**

August 2015

Kane Springs Federal 27-1 Gas Pipeline Reroute

Location: NWSE, Sec. 27, T. 25 S., R. 19 E.

Applicant/Address: Fidelity Exploration and Production Company
1801 California Street, Suite 2500
Denver, CO 80202

U. S. Department of the Interior
Bureau of Land Management
Moab Field Office
82 East Dogwood
Moab, UT 84532
Phone: 435-259-2100
Fax: 435-259-2106



Worksheet

Determination of NEPA Adequacy

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

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Moab Field Office

TRACKING NUMBER: DOI-BLM-UT-Y010-2015-0210-DNA

CASEFILE/PROJECT NUMBER: Lease UTU65971

PROPOSED ACTION TITLE/TITLE: Gas Pipeline Reroute

LOCATION/LEGAL DESCRIPTION: NWSE, Section 27
T. 25 S., R. 19 E.
Grand County, Utah

APPLICANT (if any): Fidelity Exploration and Production Company

A. Description of the Proposed Action and Any Applicable Mitigation Measures

Fidelity Exploration and Production Company (Fidelity) has applied through a Sundry Notice (Form 3160-5) to reroute a buried gas gathering pipeline that would transport natural gas from the Kane Springs Federal 27-1 well site to the existing Cane Creek Unit 26-2 gas pipeline, which would transport the gas to market. A buried gas pipeline was analyzed for the Kane Springs Federal 27-1 in the Natural Gas Gathering Line System for the Dead Horse Lateral Pipeline Environmental Assessment (DOI-BLM-UT-Y010-2014-0115-EA) and approved in the Record of Decision (October 2, 2014) to exit the northeast corner of the well pad and travel north adjacent to the 79 foot long access road. Fidelity proposes to reroute the buried gas pipeline to exit the northeast corner of the well pad and travel east 11 feet across country and 15 feet underneath an existing road to connect to the existing gas pipeline, which would reduce the length of pipe to install and reduce the amount of surface disturbance. Fidelity proposes that no equipment would travel across country. Fidelity would construct the pipeline trench with an "Extend-a-Hoe" that would be operated from the Kane Springs Federal 27-1 well pad or existing road. The amount of surface disturbance would likely be less than an 11' by 30' area (0.007 acres).

Mitigation Measures:

Applicable Conditions of Approval (COAs) attached to the previously approved gas pipeline (October 2014).

B. Land Use Plan (LUP) Conformance

The proposed action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3).

Plan: Moab Field Office Record of Decision and Resource Management Plan

Date: October 2008

Conformance Review:

Page 65: Lands and Realty Goals and Objectives

Meet public needs for use authorizations such as rights-of-way, alternative energy sources, and permits while minimizing adverse impacts to resource values.

Page 73: Minerals Goals and Objectives

Provide opportunities for environmentally responsible exploration and development of mineral and energy resources subject to appropriate BLM policies, laws and regulations.

Page 75: MIN-15

Oil and gas leases issued prior to the RMP will continue to be managed under the stipulations in effect when issued. Environmental best management practices will be incorporated into subsequent permits and authorizations to mitigate impacts and conflicts with other uses and resource values.

C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

NEPA Document: Natural Gas Gathering Line System for the Dead Horse Lateral Pipeline and Amendment of Right-of-Way UTU-67385 Dead Horse Lateral Natural Gas Pipeline Environmental Assessment (DOI-BLM-UT-Y010-2014-0115-EA)

Record of Decision Date: October 2, 2014

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?

Yes
 No

Documentation of answer and explanation:

Within the Natural Gas Gathering Line System for the Dead Horse Lateral Pipeline and Amendment of Right-of-Way UTU-67385 Dead Horse Lateral Natural Gas Pipeline

Environmental Assessment (Gas Gathering Line EA), the BLM analyzed the installation of a buried gas pipeline along the Kane Springs Federal 27-1 access road with a 16-foot wide construction corridor off the road, which would create 0.1 acres of surface disturbance under Alternative D (pg. 36; pg. 39, Table 2-8). The current proposed action includes the installation of a buried pipeline that would create less than 0.007 acres of surface disturbance 11 feet off the northeast well pad corner (start of the access road), which is an essentially similar proposal within the same analysis area as described in Alternative D of the Gas Gathering Line EA. The proposed action is different from the previously analyzed pipeline route, because the proposed action would be buried 11 feet perpendicular to the access road compared to installation 2 feet from and parallel to the 79-foot access road. Since the route in the Gas Gathering Line EA was analyzed with a 16-foot disturbance width along the access road, the 11-foot disturbance extent off the northeast well pad corner (start of access road) would remain within the previously analyzed area. The differences between the two routes are not considered substantial, because the proposed action would create essentially the same amount of surface disturbance in the same analysis area.

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

Yes
 No

Documentation of answer and explanation:

The Gas Gathering Line EA analyzed a broad range of alternatives, which included burying the gas pipeline along the road (Alternative A, C, & D), burying the gas pipeline under the road (Alternative F), installing the gas pipeline above the ground adjacent to the road (Alternative E), and not installing the gas pipeline (No Action Alternative). All alternatives included 0.1 acres of surface disturbance for the installation of this gas pipeline. Impacts from all the alternatives were analyzed in relation to the following resources/uses: air quality, pipeline safety, recreation, socioeconomic resources, soils, vegetation, and visual resources.

3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list 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?

Yes
 No

Documentation of answer and explanation:

No new information or circumstances have developed since a buried gas pipeline route was analyzed for the Kane Springs Federal 27-1 in the Gas Gathering Line EA and approved with the Record of Decision on October 2, 2014.

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?

Yes
 No

Documentation of answer and explanation:

Since the proposed action creates essentially the same amount and type of surface disturbance as Alternative D in the Gas Gathering Line EA, the direct, indirect, and cumulative effects from the proposed action would be similar to those analyzed in the existing NEPA document.

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

Yes
 No

Documentation of answer and explanation:

Since the proposed action is essentially similar to the previously analyzed pipeline route, public involvement associated with the Gas Gathering Line EA is adequate for the current proposed action.

The BLM posted the proposed action for the Gas Gathering Line EA on the Environmental Notification Bulletin Board (ENBB) on March 5, 2014, to notify the public of the proposal and solicit public concerns. One letter was received by the Sierra Club. A summary of these comments and BLM responses are contained in Appendix B of the Gas Gathering Line EA.

On August 8, 2014 the Gas Gathering Line EA was made available for public review and comment by posting it on the ENBB. A press release and legal notice were published in the *Moab Times Independent* newspaper on August 14, 2014, to notify the public that the EA was available and to initiate the comment period. The comment period ended on August 27, 2014. Summaries of these comments and BLM responses are contained in Appendix H of the Gas Gathering Line EA. As a result of public comments, a few changes were made to the Gas Gathering Line EA in the form of minor edits regarding spelling and punctuation. Some additional information was added to clarify information presented in the Gas Gathering Line EA and two new alternatives were added.

The BLM posted the current proposed action on the BLM ePlanning website (BLM's national register for NEPA documents) on July 29, 2015.

E. Persons/Agencies/BLM Staff Consulted:

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Ann Marie Aubry	Hydrologist	Air Quality, Soils

Katie Stevens	Recreation Planner	Visual Resources, Recreation
Bill Stevens	Recreation Planner	Socioeconomics,
Jordan Davis	Range/Weed Specialist	Vegetation
Utah State Historic Preservation Office	-	Cultural Resources

CONCLUSION

Plan Conformance:

- This proposal conforms to the applicable land use plan.
- This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy

- 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 the NEPA.
- The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

 <hr/> Signature of Project Lead	8/4/15 <hr/> Date
 <hr/> Signature of NEPA Coordinator	8/5/2015 <hr/> Date
 <hr/> Signature of the Responsible Official	8/10/15 <hr/> 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.

ATTACHMENTS:

- **Interdisciplinary Team Checklist**
- **Conditions of Approval**
- **Kane Springs Federal 27-1 Pipeline Reroute (Figure 1)**
- **Location Map (Map A)**

Permit: Sundry Notice (Form 3160-5) - Gas Pipeline Reroute

Applicant: Fidelity Exploration and Production Company

Well Name: Kane Springs Federal 27-1

Lease Number: UTU65971

Well Location: Section 27, T. 25 S., R. 19 E., Grand County, Utah

CONDITIONS OF APPROVAL

1. The proposal and commitments submitted in the Sundry Notice on July 1, 2015 must be followed during construction operations, including no equipment travel on areas other than the well pad or road surface.
2. The operator must adhere to applicable Conditions of Approval (COAs) that were attached to the Dead Horse Lateral Natural Gas Gathering Line Sundry Notice for the Kane Springs Federal 27-1 well, which was approved on October 2, 2014.

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Kane Springs Federal 27-1 Gas Pipeline Reroute

NEPA Log Number: DOI-BLM-UT-Y010-2015-~~020~~-DNA

File/Serial Number: UTU65971

Project Leader: Tanner Nygren

DETERMINATION OF STAFF: *(Choose one of the following abbreviated options for the left column)*

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

The following elements are not present in the Moab Field Office and have been removed from the checklist:
Farmlands (Prime or Unique), Wild Horses and Burros.

Determi- nation	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NC	Air Quality Greenhouse Gas Emissions		Am Alby	7.28.15
NC	Floodplains		Am Alby	7.28.15
NC	Soils		Am Alby	7.28.15
NC	Water Resources/Quality (drinking/surface/ground)		Am Alby	7.28.15
NC	Wetlands/Riparian Zones		Am Alby	7.28.15
NC	Areas of Critical Environmental Concern		K. Stevens	7-29-15
NC	Recreation		K. Stevens	7-29-15
NC	Wild and Scenic Rivers		K. Stevens	7-29-15
NC	Visual Resources		K. Stevens	7-29-15
NC	BLM Natural Areas		J. Stevens	7-29-15
NC	Socio-Economics		J. Stevens	7-29-15
NC	Wilderness/WSA		J. Stevens	7-29-15
NC	Lands with Wilderness Characteristics		J. Stevens	7-29-15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Cultural Resources	Previous Screening	[Signature]	7/28/15
NC	Native American Religious Concerns	Previous Screening	[Signature]	7/28/15
NC	Environmental Justice		[Signature]	7-29-15
NC	Wastes (hazardous or solid)		[Signature]	7-29-15
NC	Threatened, Endangered or Candidate Animal Species		[Signature]	7/28/15
NC	Migratory Birds		[Signature]	7/28/15
NC	Utah BLM Sensitive Species		[Signature]	7/28/15
NC	Fish and Wildlife Excluding USFW Designated Species		[Signature]	7/28/15
NC	Invasive Species/Noxious Weeds		[Signature]	7/28/15
NC	Threatened, Endangered or Candidate Plant Species		[Signature]	7/28/15
NC	Livestock Grazing		[Signature]	7/28/15
NC	Rangeland Health Standards		[Signature]	7/28/15
NC	Vegetation Excluding USFW Designated Species		[Signature]	7/28/15
NC	Woodland / Forestry		[Signature]	7/28/15
NC	Fuels/Fire Management		[Signature]	7/28/15
NC	Geology / Mineral Resources/Energy Production		[Signature]	7-29-15
NC	Lands/Access		[Signature]	7-28-15
NC	Paleontology		[Signature]	8/4/15

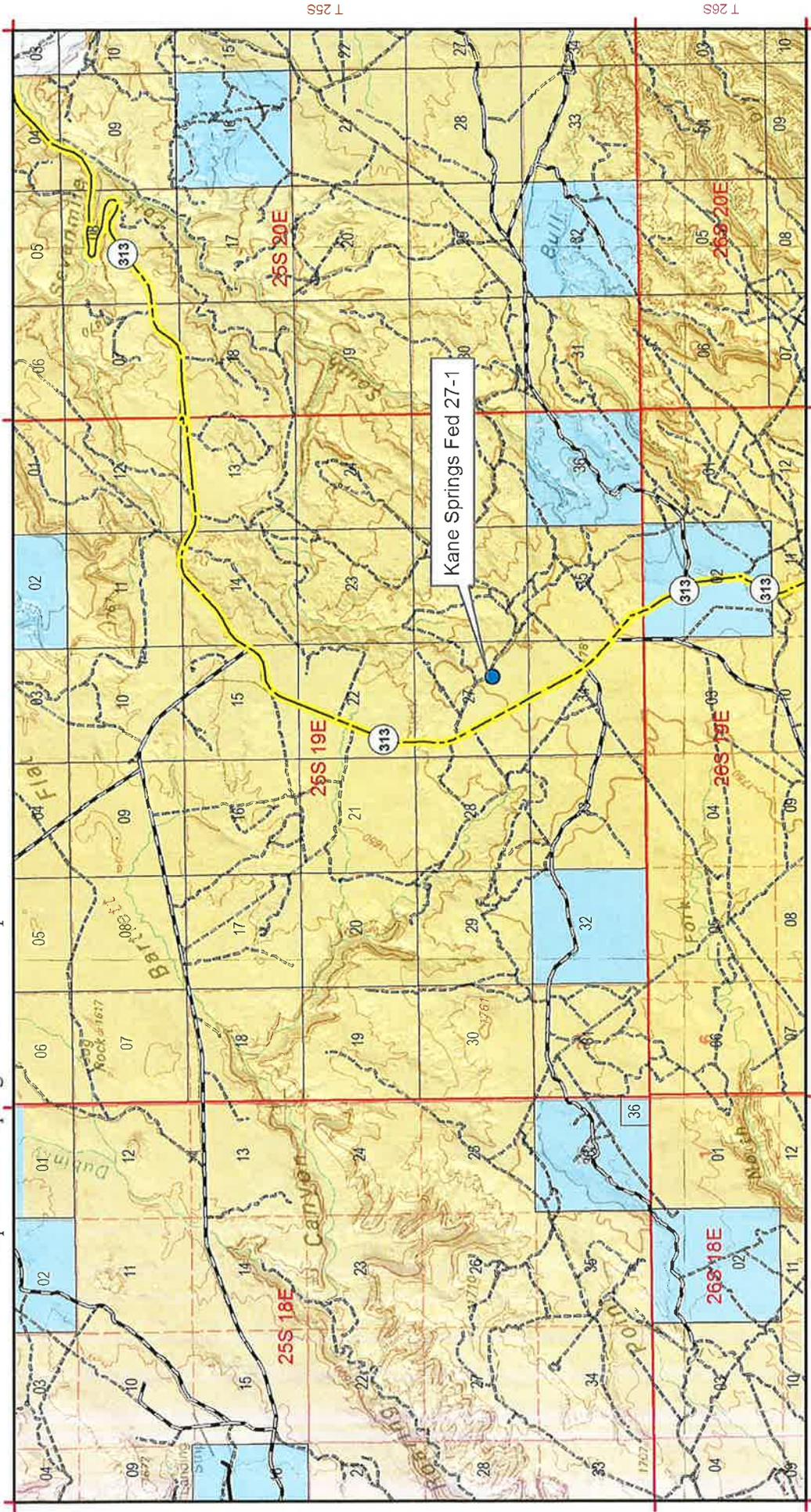
FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	[Signature]	8/5/2015	
Authorized Officer	[Signature] acting for Beth Kimmel	8/16/15	

Figure 1 - Kane Springs Federal 27-1 Pipeline Reroute



R 18E Map A - Kane Springs Federal 27-1 Pipeline Reroute R 19E

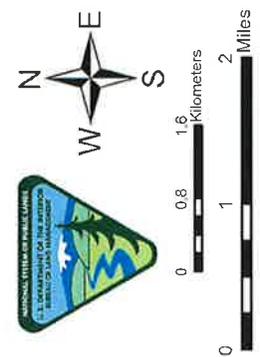


Location Map
Utah BLM Field Office Boundaries



Date: 7/27/2015

Bureau of Land Management
Moab Field Office



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

State and Federal Highways	National Park Service (NPS)
B Roads (Maintained)	Other Federal
D Roads (Unmaintained)	Private
BLM Wilderness Area	State
Bureau of Land Management (BLM)	State Parks and Recreation
Bankhead-Jones Land Use Lands	State Wildlife Reserve/Management Area
Bureau of Reclamation	US Fish & Wildlife (USFW) National Wildlife Refuge
Indian Reservation (IR)	US Forest Service (USFS)
Military Reservations and Corps of Engineers	USFS Wilderness Area