

**Determination of NEPA Adequacy  
(DNA)**

**Koch Exploration North Alger 27–31 Multi Well  
Pad**

**DOI-BLM-UT-G010-2015-0128-DNA**

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# **Chapter 1. Determination of NEPA Adequacy (DNA)**

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

OFFICE: Vernal Feild Office:LL00UTG010

CASEFILE/PROJECT NUMBER: DOI-BLM-UT-G010-2015-0128-DNA

PROPOSED ACTION TITLE/TYPE: Koch Exploration North Alger 27–31 Multi Well Pad

LOCATION/LEGAL DESCRIPTION: T10S R19E SEC 27

APPLICANT: Koch Exploration Company LLC

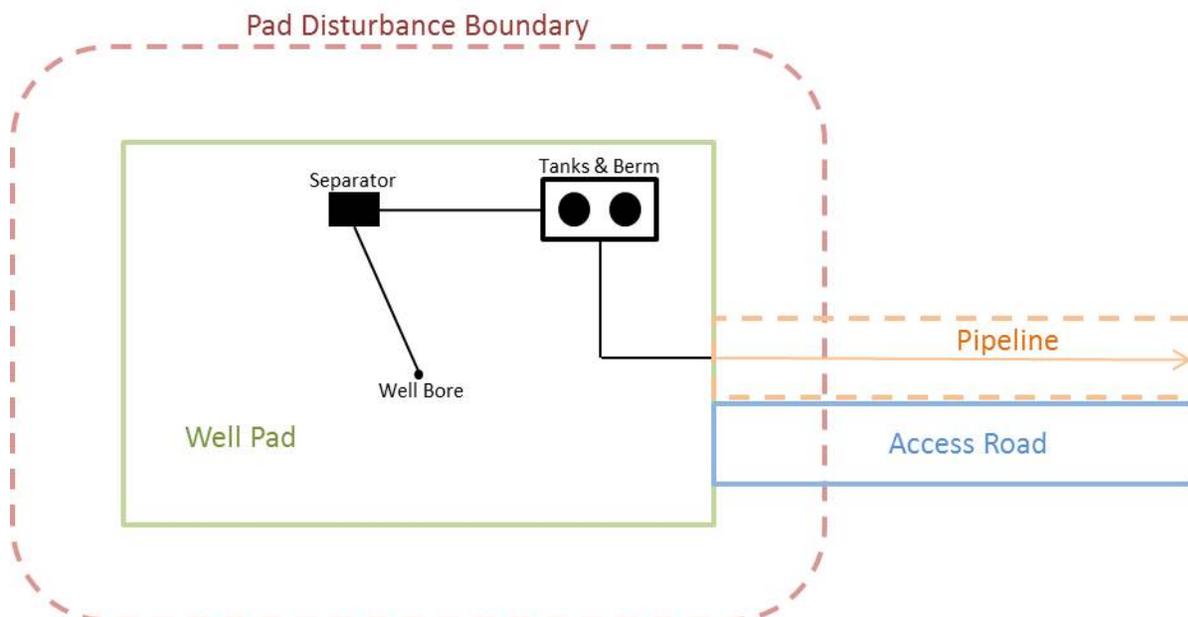
## A. Description of Proposed Action and any applicable mitigation measures

Koch Exploration proposes to build a well pad and access road that would result in approximately 9.98 acres of new disturbance approximately 55 miles southwest of Vernal Utah. The pad, access, and wells with associated facilities and pipelines would be located on BLM lands and would be within the boundaries of mineral lease# UTU49518. Eight gas wells are proposed to be drilled on this pad. Table 1.1, “Proposed Disturbance” (p. 1) provides pad, access, and pipeline dimensions with related project disturbance acreage.

**Table 1.1. Proposed Disturbance**

Site ID	Well Pad Dimensions	Pad Disturbance Boundary	Access Road	Pipeline ROW*	Total disturbance
North Alger 27–31	485' X 340' = 3.94 Acres	3.85 Acres	3,185' X 30' = 2.19 Acres	4,125' X 40'	9.98 Acres

\*Proposed pipeline would be laid on the surface adjacent to the road. No disturbance would be necessary. A diagram is provided below as a generic reference to aid in understanding disturbance categories provided in the table.



## **Proposed Surface Use**

### **Well Pad Facilities**

- Production facilities would be set on location if the wells are successfully completed for production. Facilities would consist of wellhead valves and piping, separators, a dehydrator, combustor and meter run that would be housed in buildings, a gas pipeline, and sixteen 300-barrel tanks for condensate and produced water.

All condensate and water tanks would be surrounded by a berm of sufficient capacity to contain the larger of: 110 percent of the storage capacity of the largest tank in the battery or 100 percent of the largest tank in the battery plus additional freeboard for a 25-year, 24-hour rain event.

- Gas gathering lines – A 4” gas gathering line will be buried from the separator to the edge of the location.

### **Pipeline ROW**

- The proposed pipeline would be 4,125 feet x 40 feet. The proposed pipeline would leave the eastern edge of the well pad and would tie in to an existing pipeline located in the SE 1/4 of Section 27, T10S, R19E.
- Proposed pipeline would be laid on the surface off location.
- Ramps would be constructed where necessary to maintain vehicle access.

### **Access Road**

- All travel would be confined to existing access road right-of-way.
- The access road would have a 30-foot ROW with a 16 foot running surface. No turnouts would be required.
- No bridge, or major cuts and fills would be required.
- The access road would be dirt surface.
- No gates, cattle guards, or fences would be installed.
- All roads would meet standards appropriate to anticipated use. Bulldozers, graders, and other types of heavy equipment would be used to upgrade, construct, and maintain the roads. Construction would not be performed during wet conditions when soils are saturated. When they are available, existing roads would be used to access all well locations.
- Construction of new roads would conform to standards described in the joint BLM/USFS publication: *Surface Operating Standards for Oil and Gas Exploration and Development, 4th Edition* (Oil & Gas Gold Book) (USDI and USDA, 2007).

### **Source of Construction Materials**

- Access roads would typically be surfaced with native material; however a road’s running surface may be graveled, depending on weather conditions. If materials other than native materials found on the well pad would be needed, the Operator would obtain materials from permitted gravel pits.

## **Reclamation**

### **Interim Reclamation**

- Immediately upon well completion, the location and surrounding area would be cleared of all unused tubing, equipment, debris, materials, trash, and junk not required for production.
- Interim reclamation would adhere to the approved Koch Exploration Reclamation plan as contained within the North Alger Project Environmental Assessment (DOI-BLM-UT-G010-012-0112 EA, Appendix D).

### **Final Reclamation and Abandonment**

- At such a time as the well is plugged and abandoned, the operator would submit a subsequent report of abandonment and the BLM would attach the appropriated surface rehabilitation conditions of approval.
- Final reclamation would adhere to the approved Koch Exploration Reclamation plan as contained within the North Alger Project Environmental Assessment (DOI-BLM-UT-G010-012-0112 EA, Appendix D).

## **Methods of Handling Waste Disposal**

- Drilling fluids would consist of a water/gel mixture, with water being the main constituent. Drilling fluids and cuttings would be contained entirely within temporary above ground tanks for fluids, and cuttings pit for cuttings.
- A closed loop system would be utilized; drill cuttings would be separated from the drilling mud and then deposited in a steel catch tank. As drilling continues, the cuttings would be removed from the tank to a cuttings storage area on the north-west corner of the well pad. When the cuttings are dried and tested they would be spread on the well pad and/or access road after drilling is complete, according to applicable regulatory requirements.
- Hydrocarbons produced during the completion work would be contained in test tanks and removed from location at a later date.
- Sewage will be handled in self-contained, chemical treated portable toilets and contents would be hauled to an approved sewage treatment facility.
- Garbage and other trash would be contained in a portable trash cage, and would be totally enclosed with small mesh wire. Cage and contents would be hauled to an approved landfill. The road and pad would be kept litter free.

Hazardous waste would not be generated in association with drilling the proposed wells. Most wastes that would result from drilling and operating the proposed wells are excluded from regulation by the Resource Conservation and Recovery Act under the exploration and production exemption in Subtitle C [40 CFR 261.4(b)(5)] and are considered solid wastes. Such wastes include those generated at the well head and through the production stream. Exempt wastes include produced water, production fluids such as drilling mud or well stimulation flow-back fluids, and soils affected by spills of these fluids.

Spill Prevention Control and Countermeasure Plans (SPCCPs) have been prepared by Koch Exploration Company, LLC for all of the North Alger Project Area (NAPA) wells, as required by

regulation. Accidental spills of oil, produced water, or other produced fluids would be cleaned up and disposed of in accordance with appropriated regulations and the SPCCP. An accidental leak or spill in excess of the reportable quantity established by 40 CF Part 117.3 would be reported as required by the Comprehensive Environmental Response, Compensation, and Liability Act, Section 102(b).

### **Other information**

- As operator, Koch Exploration Company, LLC would control noxious weeds along Right-of-Ways for roads, pipelines, well sites, or other applicable facilities. A list of noxious weeds would be obtained from the BLM administered land, a Pesticide Use Proposal (PUP) would be submitted, and given approval, prior to the application or herbicides or other pesticides or possible hazardous chemicals.
- Completion operations would be conducted utilizing a completion/workover rig.
- Drilling rigs and/or equipment used during drilling operations on this well site would not be stacked or stored on BLM lands after the conclusion of drilling operations or at any other time without BLM authorization.
- All lease and/or unit operations would be conducted in such a manner that full compliance would be made with all applicable laws, regulations and Onshore Oil and Gas Orders.
- All lease and/or unit operations would be conducted in full compliance with all performance standards, mitigation requirements, and conservation measures contained in **DOI-BLM-UT-G010-2012-0112**, approved January 17, 2013, and any applicable Notice of Lessees. The operator would be fully responsible for the actions of its sub-contractors. A complete copy of the approved “Application for Permit to Drill” and “Right-of-Way grant”, if applicable, would be furnished to the field representative(s) to ensure compliance and shall be on location during all construction and drilling operations.
- If the existing access road, proposed access road, and proposed pad are dry during construction, drilling, and completion activities, water would be applied to help facilitate compaction during construction and to minimize soil loss as a result of wind erosion.
- During construction care would be taken to keep all fill materials between corners #2 and #3 out of the drainage area.

## **B. Land Use Plan Conformance**

**Vernal Resource Management Plan**

**October, 2008**

*\*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto*

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**Applicable Land Use Plan(s)** Vernal Field Office (VFO) ROD/RMP, October 2008 (as maintained). The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions (as maintained):

- MIN2 (VFO ROD/RMP page 97). Mineral and energy resources exploration and development surface-disturbing activities will be allowed in the VPA unless precluded by other program prescriptions. The stipulation identified for surface-disturbing activities in Appendix K will generally apply to these activities

- MIN-10 (VFO ROD/RMP page 99). Approximately 750,131 acres will be open to leasing subject to the terms and conditions of the standard lease form.
- MIN-11((VFO ROD/RMP page 99) Approximately 890,280 acres will be open to leasing subject to moderate constraints, such as TLs and CSU.
- MIN-12 (VFO ROD/RMP page 99). Approximately 86,789 acres will be open to leasing subject to major constraints such as No Surface Occupancy (NSO) stipulations.
- MIN-13 (VFO ROD/RMP page). Approximately 190,434 acres will be unavailable for leasing.
- The proposed action is also consistent with the Vernal Field Office's ROD/RMP decisions and objectives as they relate to the management of the following resources (including but not limited to): air quality, wildlife, minerals, cultural, BLM Natural Areas and non-wilderness study area lands with wilderness characteristics.

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

**List by name and date all applicable NEPA documents that cover the proposed action.**

North Alger Project EADOI-BLM-UT-G010-2012-0112

January 17, 2013

**List by name and date other documentation relevant to the proposed action (e.g. biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).**

Final Biological Opinion for Koch Exploration Company's North Alger Project January 17, 2013

### **D. Nepa Adequacy Criteria**

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

Yes, this effect of this proposal have been analyzed in the documents listed above.

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

Yes

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

Yes

**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, the North Alger Development EA examines the direct, indirect, and cumulative effects of the proposed action in detail.

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

Agency	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
United States Fish & Wildlife Service (USFWS)	Information on Consultation, under Section 7 of the Endangered Species Act (16 USC 1531).	Formal consultation was conducted Under the North Algers Project EA, with respect to T&E plant and wildlife species. Payments would be made to the Recovery Implementation Program (RIP) for Endangered Fish Species in the Upper Colorado River Basin, as applicable. The USFWS concurred with the BLM's effect determinations on October 2, 2012.
Utah State Historic Preservation Office (SHPO)	Consultation for undertakings, as required by the National Historic Preservation Act (16 USC 470).	A consultation letter was sent to SHPO on February 19, 2015 recommending a "no historic properties affected" determination. We received their concurrence to our determination on February 26, 2015.
Native American consultation	Consultation as required by the American Indian Religious Freedom Act of 1978 (42 USC 1531) and NHPA (16 USC 470).	A letter was sent to interested Tribes on July 11th, 2012. Responses were received from the Hopi Tribe, the Confederated Tribes of the Goshute Reservation, and the Pueblo of Laguna. The Hopi Tribe requested to review future cultural resource inventories associated with the proposed development. No other concerns were brought forth.

## E. Persons/Agencies/BLM Staff Consulted

**Table 1.2. List of Preparers**

Name	Role
David Baird	Natural Resource Specialist

**Note**

Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents and the ID team checklist for a complete list of team members that reviewed this DNA.

## Conclusion

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

\_\_\_\_\_  
Signature of Project Lead

Kelly Buckner 10/09/2015  
Signature of NEPA Coordinator

Jerry Kenczka 10/9/2015  
Signature of the Responsible Official 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 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.

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# Appendix A. Interdisciplinary Team Checklist

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Koch Exploration North Alger 27–31 Multi Well Pad

**NEPA Log Number:** DOI-BLM-UT-G010-2015-0128-DNA

**File/Serial Numbers:** UTU49518

**Project Leader:** David Baird

### DETERMINATION OF STAFF:

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 significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

Determination	Resource/Issue	Rationale for Determination	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NI	Air Quality & Greenhouse Gas Emissions	Emissions from earth-moving equipment, vehicle traffic, drilling and completion activities, separators, oil storage tanks, dehydration units, and daily tailpipe and fugitive dust emissions could adversely affect air quality. But these effects have been examined in detail under DOI-BLM-UT-G010-2012-0112–EA	David Baird	6/17/2015
NP	BLM Natural Areas	The project area does not lie in any designated BLM Natural Area following GIS review.	David Baird	6/17/2015
NP	Cultural: Archaeological Resources	Cultural inventory resulted in no archaeological sites being recorded.	David Grant	9/3/2015
NP	Cultural: Native American Religious Concerns	No traditional Cultural Properties (TCPs) are identified within the APE. The proposed project will not hinder access to or use of Native American religious sites.	David Grant	9/3/2015
NP	Designated Areas: Areas of Critical Environmental Concern	The project area does not lie in any designated Area of Critical Environmental Concern following GIS review.	David Baird	6/17/2015
NP	Designated Areas: Wild and Scenic Rivers	None present as per Vernal RMP/ROD and GIS layer review	William Civish	6/24/2015
NP	Designated Areas: Wilderness Study Areas	None present as per Vernal RMP/ROD and GIS layer review	William Civish	6/24/2015

<b>Determina- tion</b>	<b>Resource/Issue</b>	<b>Rationale for Determination</b>	<b>Signature</b>	<b>Date</b>
NP	Environmental Justice	The proposed alternatives would not likely create disproportionately high and adverse human health impacts or environmental effects on minority or low-income populations since there are none in the project area.	David Baird	6/17/2015
NP	Farmlands (prime/unique)	All prime or unique farm lands in the Uintah Basin must be irrigated to be considered under this designation, among other factors. No irrigated lands are located in the proposed action area; therefore this resource will not be carried forward for analysis.	David Baird	6/17/2015
NP	Fuels/Fire Management	There are no past or planned fuels projects in the immediate area. The proposed reclamation activities should prevent additional hazardous fuels.	David Baird	6/17/2015
NI	Geology/Minerals/Energy Production	Natural gas, oil, Gilsonite, oil shale and tar sand are the mineral resources that could be significantly impacted by the proposal, however, no adverse impact is expected based on the following: <ul style="list-style-type: none"> <li>• The production of natural gas and oil is allowed under the existing Federal lease.</li> <li>• Compliance with <i>Onshore Oil and Gas Order No. 2, Drilling Operations</i> will assure that mineral resources such as Gilsonite, oil shale or tar sand deposits are isolated and protected.</li> <li>• If there is an active Gilsonite mining operation within 2 miles of the well location, the operator shall notify the Gilsonite operator at least 48 hours prior to any blasting during construction (VFO standard condition of approval for APD's).</li> </ul>	Justin Snyder	7/1/2015
NI	Invasive, Non-Native Species (EO 13112)	The proposed action would result in 9.98 acres of new disturbance within a Mat Saltbush vegetation community where soils consist of desert shallow clay. Ground disturbance would create potential areas for infestation; however this project tiers to the North Alger Field Development EA (DOI-BLM-UT-G010-2012-0112) which analyzes impacts related to noxious weeds, soils and vegetation. Wherein, Koch Exploration also committed to aggressive mitigation measures (DOI-BLM-UT-G010-2012-0112 section 2.2.6 "vegetation"). No concerns have been identified in addition to those addressed therein. As such, there is no need to analyze impacts within this document.	David Baird	6/17/2015
NI	Lands/Access	All new construction is within the North Algers Unit, which was analyzed under DOI-BLM-UT-G010-2012-0112	David Baird	6/17/2015

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NP	Lands with Wilderness Characteristics (LWC)	None present as per Vernal RMP/ROD and GIS layer review	William Civish	6/24/2015
NC	Livestock Grazing & Rangeland Health Standards	There are no additional impacts from the proposed project to the livestock operation than those that were analyzed in the previous NEPA document. No new or previously unknown information has been made available related to the previous environmental analysis.	Dusty Carpenter	8/17/2015
NI	Paleontology	No impact is expected based on the following: <ul style="list-style-type: none"> <li>● Outlaw Engineering Inc./Paleo Mentors Inc. performed a field survey of proposed surface disturbance (report dated August 12, 2014). Paleo clearance was recommended based on the fact that no significant paleontological resources were discovered.</li> <li>● If paleontological resources are discovered during operations, all activities which will affect them will cease and the BLM Authorized Officer will be contacted (VFO standard condition of approval for APD's).</li> </ul>	Justin Snyder	7/1/2015
NI	Plants: BLM Sensitive	No BLM-sensitive plants were found during plant surveys conducted June, 2014	Jessi Brunson	7/28/2015
NC	Plants: Threatened, Endangered, Proposed, or Candidate	The project is in an area that may contain habitat for clay reed-mustard ( <i>Schoenocrambe argillacea</i> ) and Uinta Basin hookless cactus ( <i>Sclerocactus wetlandicus</i> ). No individuals were found during surveys conducted June 2014.	Jessi Brunson	7/28/2015
NP	Plants: Wetland/Riparian	Riparian habitat is not inventoried or known within the project area and the development would not be expected to negatively impact riparian of the Green River indirectly.	David Baird	6/17/2015
NI	Recreation	There are no recreation sites in this project area. Recreation will not be effected by this project.	David Baird	6/17/2015
NI	Socio-Economics	Effects on social and economic values would be minimal and would not require further analysis due to the small-scale nature of the action when compared to the larger economy in the area.	David Baird	6/17/2015
NI	Visual Resources	This project area is in Class IV VRM> The objective Class IV is to provide for management activities that require major modifications to the existing character of the landscape. The level of change to the landscape can be high. The management activities may dominate the view and may be the major focus of the viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repetition of the basic visual elements of form, line, color and texture.	William Civish	6/24/2015

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NI	Wastes  (hazardous/solid)	<p>Hazardous Waste: No chemicals subject to reporting under SARA Title III in an amount equal to or greater than 10,000 pounds will be used, produced, stored, transported, or disposed of annually in association with the project. Furthermore, no extremely hazardous substances, as defined in 40 CFR 355, in threshold planning quantities, will be used, produced, stored, transported, or disposed of in association with the project.</p> <p>Solid Wastes: Trash would be confined in a covered container and hauled to an approved landfill. Burning of waste or oil would not be done. Human waste would be contained and be disposed of at an approved sewage treatment facility.</p>	David Baird	6/17/2015
NP	Water:  Floodplains	The only HUD inventoried flood plain is located within the west edge of Section 28 of the project area. However all ephemeral drainages have some degree of non-HUD inventoried flood plains. The proponent should identify how well pads, roads and pipeline would impact flood plains and how the proposed project relates to Executive Order # 11988 for Floodplain Management.	David Baird	6/17/2015
NI	Water Resources Quality (drinking  /surface /ground)	<p>Surface: The proposed action would increase potential for chemical spills and soil erosion. However, sufficient analysis of these impacts to surface water quality is addressed in the North Alger Field Development EA (DOI-BLM-UT-G010-2012-0112). No additional concerns have been identified. As such, no analysis is necessary.</p> <p>Groundwater: No impact to groundwater is expected based on the following-</p> <ul style="list-style-type: none"> <li>● Wells must be drilled in compliance with <i>Onshore Oil and Gas Order No. 2, Drilling Operations</i>, which requires that all useable groundwater be isolated and protected.</li> <li>● Impacts to shallow groundwater from surface activities will be similar to those for surface water (see NI determinations for Stormwater, Surface Water Quality and Wastes)</li> <li>● No underground sources of drinking water, as defined in 40 CFR 144.3, have been identified by the EPA or the State of Utah in the project area.</li> </ul>	David Baird  Justin Snyder	6/17/2015  7/1/2015

<b>Determina- tion</b>	<b>Resource/Issue</b>	<b>Rationale for Determination</b>	<b>Signature</b>	<b>Date</b>
NI	Water: Hydrologic Conditions (stormwater)	The proposed pad expansion would result in 9.98 acres of disturbance. Topography would not be changed enough to cause significant differences in water flow courses. In addition, the 2005 Energy Policy Act exempts energy development from Section 402 of the Clean Water Act.	David Baird	6/17/2015
NI	Water: Surface Water Quality	The proposed action would increase potential for chemical spills and soil erosion. However, sufficient analysis of these impacts to surface water quality is addressed in the North Alger Field Development EA (DOI-BLM-UT-G010-2012-0112). No additional concerns have been identified. As such, no analysis is necessary.	David Baird	6/17/2015
NP	Water: Waters of the U.S.	Waters of the U.S. are not present per USGS topographic map and GIS data review. The proposed project would not impact any drainage where a high water mark can be distinguished, drainages which regularly run water, or wetlands/riparian areas.	David Baird	6/17/2015
NC	Wild Horses	There are no additional impacts from the proposed project to the horses located in the Hill Creek HA, than those that were analyzed in the previous NEPA document. No new or previously unknown information has been made available related to the previous environmental analysis.	Dusty Carpenter	08/17/2015
NC	Wildlife: Migratory Birds (including raptors)	Migratory bird foraging and nesting habitat would be degraded by the proposed action. If construction occurs during the spring and early summer months, nests/eggs and/or young could be destroyed. The project area is located in burrowing owl nesting habitat. Section 2.2.6 mitigation measures will apply.	Brandon McDonald	08/06/2015
NC	Wildlife: Non-USFWS Designated	The project area provides habitat for white-tailed prairie dogs. Conservation Agreement fish including bluehead sucker, flannelmouth sucker, and roundtail chub will be affected by water depletions, Raptors are addressed under the Migratory Bird Section.	Brandon McDonald	08/06/2015
NC	Wildlife: Threatened, Endangered, Proposed or Candidate	There are no known TEC species present. Water depletions would affect Endangered Colorado River Fish.	Brandon McDonald	08/06/2015
NP	Woodlands/Forestry	Not present in project area as per GIS review.	David Baird	6/17/2015

**FINAL REVIEW:**

<b>Reviewer Title</b>	<b>Signature</b>	<b>Date</b>	<b>Comments</b>
Environmental Coordinator	Kelly Buckner	10/09/2015	
Authorized Officer	Jerry Kenczka	10/09/2015	

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## Appendix B. Conditions of Approval

### Air Quality:

- The Operator will utilize drilling rig engines of Tier 2 quality or better.
- The Operator will install dehydrator volatile organic compound (VOC) emission controls to attain + 90 percent efficiency.
- If needed, the Operator will install stationary internal combustion engines that meet an emissions standard of 2 grams/BHP-hour for engines less than 300 horsepower (HP) and 1 gram/BHP-hour (base horsepower-hour) for engines greater than or equal to 300 HP. *Note: No stationary internal combustion engines are proposed for this project.*
- The Operator will install 95 percent efficient VOC emission controls on production tanks with the potential to emit more than 6 tons per year (TPY) VOCs, as required by NSPS Subpart OOOO (EPA, 2011f-as cited in the EA).
- The Operator will utilize low-bleed (or equivalent device that does not exceed the EPA low-bleed emissions thresholds of 6 scfh) pneumatic devices at all new and existing production facilities (EPA, 2011f-as cited in the EA).
- The Operator will establish a thief hatch/Enardo inspection and replacement program to minimize tank losses.
- The Operator will utilize telemetry to minimize well visits.
- The Operator will install solar-powered chemical pumps on production facilities.

The Operator will employ measures to mitigate any potential exceedance of the 1-hour NO<sub>2</sub> standard during drilling operations by employing effective public health buffer zones out to 200 meters (m) from the nearest emission source. Examples of an effective public health protection buffer zone include the demarcation of a public access exclusion zone by signage at intervals of every 250 feet that is visible from a distance of 125 feet during daylight hours, and a physical buffer such as active surveillance to ensure the property is not accessible by the public during drilling operations. Additionally, the applicant commits to developing a project-specific adaptive management strategy, to be informed by periodic emission inventory updates. Implementation of this strategy and associated application of “enhanced” ozone mitigation measures would be required once the proposed project is initiated if:

- 1) USEPA designates the area “nonattainment” for ozone;
- 2) There is a monitored ozone standard exceedance;
- 3) The ARMS modeling shows that additional mitigation is needed to prevent future ozone exceedances; or
- 4) The ARMS group establishes industry-wide mitigation requirements through ongoing modeling.

If implementation of this adaptive management strategy is triggered, the applicant commits to working with the BLM to analyze project-specific “enhanced” mitigation measures and employ

them within 1 year. The measures to be considered could include, but would not be limited to, the following:

- Reducing the total number of drill rigs.
- Installing Tier 4 or better drill rig engines.
- Seasonally reducing or ceasing drilling during specified periods.
- Using only lower-emitting drill and completion rig engines during specified time periods.
- Using natural gas-fired drill and completion rig engines.
- Replacing internal combustion engines with gas turbines for natural gas compression.
- Using electric drill rig or compression engines.
- Centralizing gathering facilities.
- Limiting blow-downs or restricting them during specified periods.
- Installing plunger lift systems with smart automation.
- Employing a monthly Forward Looking Infrared, or FLIR, monitoring program to reduce VOCs.
- Enhancing a direct inspection and maintenance program.
- Employing tank load out vapor recovery.
- Employing enhanced VOC emission controls with 95 percent control efficiency on additional production equipment having a potential to emit of greater than 5 tons per year.
- In addition to the commitments discussed above, the applicant commits to complying with applicable air pollution control rules and regulations.

Air quality issues are being addressed on a Utah-wide basis through the Utah Air Resource Technical Advisory Group (UTAG) and the BLM's ARMS. The actions outlined below have been designed to address ozone levels possibly associated with oil and gas operations in the Uinta Basin. The actions consist of the following elements:

- Refine air quality modeling predictions;
- Develop a Uinta Basin ozone action plan; and
- Implement a regional ozone action plan.

The first two elements of this strategy are being implemented by the BLM and other agency stakeholders, independent of the decision to be made regarding further development in the Uinta Basin. Regional operators may participate in these initial planning steps, thereby having the opportunity to contribute to the outcome of the process. The third element would require specific action by the applicant and other oil and gas operators in the Uinta Basin following the approval of the Decision Record. All three elements are described in more detail in the following paragraphs.

### **Cultural Resources:**

- If any cultural material is unearthed or exposed during construction operations the operator is to cease work immediately and notify the BLM Administrative Officer within 24 hours of discovery. The BLM will make an onsite visit to determine significance and make appropriate determinations on how to proceed.

**Livestock Grazing:**

- If existing range improvements were to be damaged by project operations, the Operator will contact the AO immediately for direction.
- Stock ponds in the NAPA would be avoided such that they would not be damaged by project operations. If existing stock ponds were to be functionally impaired by sedimentation resulting from project operations, the Operator will contact the AO immediately for direction and will take measures to restore the functionality of affected range improvements.

**Paleontological Resources:**

- If any paleontological resources are found during operations, all operations that could further disturb such materials will be suspended, and the AO will be contacted for direction.

**Gilsonite:**

- If there is an active Gilsonite mining operation within 2 miles of the well location, the operator shall notify the Gilsonite operator at least 48 hours prior to any blasting during construction.

**Soils and Water:**

- Stormwater flow and sedimentation will be controlled with the implementation of Gold Book BMPs and the Operator's Post-construction Stormwater plan (SWPPP) (See Appendix E of the EA).

**Threatened, Endangered, and Candidate Species:**

- Re-initiation of section 7 consultation with the USFWS will be sought immediately if any loss of Threatened or Endangered species is caused as a result of project activities

**Vegetation:**

- The Operator would implement site-specific reclamation activities based on a Reclamation Plan (Appendix D) and the Green River District Reclamation Guidelines
- The Operator would initiate an active weed management program in its NAPA leases in the spring of 2012. The Operator would use herbicides to control infestations of weeds, using procedures described in a weed control plan.
- All herbicide treatments will follow the guidance of the Record of Decision for the BLM Vegetation Treatments Using Herbicides (BLM, 2007b) and any future local Weed Management direction received from the FO to ensure the use of safeguards with respect to approved chemicals, application rates, and BMPs.
- Weed-free mulching or other means, as determined appropriate during the onsite or reclamation inspections, will be used.

Re-initiation of section 7 consultation with the USFWS will be sought immediately if any loss of plants of Threatened or Endangered species is caused as a result of project activities.

**Wildlife: Migratory Birds (including raptors)**

- Project activities are not allowed from March 1 — August 31 to minimize impacts to burrowing owl nesting. If the operator anticipates project activities within this time frame, burrowing owl surveys may be conducted according to BLM protocol. Depending on results of the surveys the timing limitation may or may not be waived.