

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

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**DOI-BLM-MT-C020-2016-0035-DNA  
November 10, 2015**

**Continental 5 Well Flaring Request**

***Location:*** Mulholland 1-32H, Section 32, T27N-R56E, MTM95552  
Tower 1-4H, Section 9, T26N-R53E, MTM92817  
English 1-5H, Section 5, T26N-R53E, MTM93515  
Dugout 1-15H, Section 15, T26N-R55E, MTM83016  
Charlotte 3-11H, Section 11, T25N-R52E, MTM84975

U.S. Department of the Interior  
Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, MT 59301  
Phone: 406-233-2800  
FAX: 406-233-2921



**Worksheet**  
**Documentation of NEPA Adequacy (DNA)**  
U.S. Department of the Interior  
Bureau of Land Management (BLM)

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**BLM Office:** Miles City Field Office, Miles City, Montana

**NEPA Number:** DOI-BLM-MT-C020-2016-0035-DNA

**Case File/Project No:**

**Proposed Action Title/Type:** Continental Resources, Inc.'s request to flare gas produced from five oil wells producing on five Federal leases per NTL-4A.

**Location/Legal Description and Federal Lease Number:**

Mulholland 1-32H, Section 32, T27N-R56E, MTM95552  
Tower 1-4H, Section 9, T26N-R53E, MTM92817  
English 1-5H, Section 5, T26N-R53E, MTM93515  
Dugout 1-15H, Section 15, T26N-R55E, MTM83016  
Charlotte 3-11H, Section 11, T25N-R52E, MTM84975

**A: Description of the Proposed Action:** To allow the occasional flaring of casinghead gas from four Federal oil wells producing on four Federal leases in Richland County, Montana. Occasionally pipeline capacity constraints prevent the gas produced from the four wells from entering the sales line. In order for the wells to continue to produce oil during those conditions, the gas must be flared. The total gas produced from those four wells is approximately 624 mcf/d. Of that volume, approximately 54 mcf/d is used beneficially to produce the wells.

Continental Resources also requests to continuously flare an uneconomic volume of gas from one well, the Mulholland 1-32H. The casinghead gas produced from that well is approximately 125 mcf/d. Of that volume, approximately 25mcf/d is use beneficially to produce the well. The remaining 100 mcf/d is inadequate to render a sales line and related infrastructure economic and must be flared in order for the well to produce oil.

**Applicant:** Continental Resources, Inc.

**County:** Richland County, Montana

**DNA Originator:** Paul Helland

**B. Land Use Plan (LUP) Conformance**

LUP Name\* MCFO's ARMP Date Approved September 15, 2015

Other document\*\* DOI-BLM-MT-C020-2012-155-EA Date Approved April 17, 2012

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

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) Miles City Field Office ARMP, September 2015, Minerals Appendix, MIN 21.

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

[Continental 9 Well EA](#) for the nine Continental APDs  
Miles City Field Office ARMP, September 2015

**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 action is similar to the action analyzed in the above mentioned environmental documents and is in the same Class II airshed. The impacts would be similar to the impacts analyzed in the referenced environmental documents. This request is to allow for venting or flaring of the gas produced from the above referenced wells when the gas is not saleable such as when sales line capacity is exceeded.

**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, resource values?** Yes, the current circumstances and alternatives are similar to the situation analyzed in the referenced EA. The alternatives are to allow the venting or flaring of produced gas or no action (not approve the venting/flaring of gas). If this gas is not vented or flared when circumstances dictate, the wells cannot produce oil.

**3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstance would not substantially change the analysis of the new proposed action?** Yes, the existing analysis is valid and the action is in the same airshed analyzed in the referenced EA. Circumstances have not significantly changed regarding air quality in the area.

**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 effects are similar to the situation analyzed in the referenced documents. The primary environmental effect from this action would be a slight degradation of air quality in the immediate area of the flare stack.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes, other appropriate agencies are involved. When the operator has approval to flare or vent from the BLM, the Conditions of

Approval to vent or flare state, “This approval does not constitute approval via permit or rule to vent gas from the Oil and Gas Conservation Division, Department of Natural Resource and Conservation of the State of Montana or the Air Quality Division, Montana Department of Health and Environmental Sciences. Venting and flaring cannot occur unless it is in compliance with the aforementioned agencies’ permits and administrative rules.” Thus other agencies relevant to this action are involved as required.

**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>	<u>Initials &amp; Date</u>
<b>Paul Helland</b>	<b>Petroleum Engineer</b>	<b>Minerals</b>	<b>PH 11-5-15</b>

/s/ Kathy Bockness  
**Environmental Coordinator**

11/10/2015  
**Date**

**F. Mitigation Measures:** List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

Please see attached COAs.

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**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 requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

/s/ Shane Findlay  
 Shane Findlay  
 Assistant Field Manager  
 Division of Mineral Resources

12/1/2015  
 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 the DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.