

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

**DOI-BLM-MT-C020-2016-0044-DNA
01/05/20165**

**Continental 2 Well
Flaring**

Location: **Richland County**
Charlotte 1-11H, Section 11, T25N-R52E and
Charlotte 2-14H, Section 14, T25N-R52E

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

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

NEPA Number: DOI-BLM-MT-C020-2016-0044-DNA

Case File/Project No:

Proposed Action Title/Type: Continental Resources Inc.'s request to flare gas produced from the Charlotte 1-11H and Charlotte 2-14H producing on Federal lease MTM84975 per NTL-4A.

Location/Legal Description: Charlotte 1-11H, Section 11, T25N-R52E and
Charlotte 2-14H, Section 14, T25N-R52E

A: Description of the Proposed Action: To allow flaring of casinghead gas from two Federal oil wells producing on lease MTM84975. The wells are connected to a sales line and the casinghead gas produced from these wells have been sold. In order for the wells to continue to produce oil, the gas must be occasionally flared due to pipeline capacity constraints. The total gas produced from these well is approximately 60mcf/d with about 16mcf/d used beneficially for lease operations.

Applicant: Continental Resources, Inc.

County: Richland County, Montana

DNA Originator: Paul Helland

B. Land Use Plan (LUP) Conformance

LUP Name* Big Dry RMP Date Approved April, 1996

Other document** EA for nine Continental wells Date Approved 4-17-2012

**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) Big Dry RMP, Page 325, Under **Seperating, Treating, and Storage**, this section states in part, "the gas can be flared or vented into the atmosphere when authorized by permit in accordance with state and federal regulations."

C. Identify applicable National Environmental Policy Act (NEPA) document(s) and other

related documents that cover the proposed action.

Big Dry RMP, EA [MT-C020-2012-155-EA](#) for the nine Continental Resources APDs

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? 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 flaring of the produced gas from the above referenced well.

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? The current circumstances and alternatives are similar to the situation analyzed in the referenced EA. The alternatives are to allow the flaring of produced gas or no action (not approve the flaring of gas). If this gas is not flared, the well 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? 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 & Date</u>
Paul Helland	Petroleum Engineer	Minerals	PH 12-21-15

/s/ Kathy Bockness
Environmental Coordinator

1/5/2016
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.

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

1/11/16
 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.