

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

Royal Gorge Field Office

3028 E. Main

Cañon City, CO 81212

OFFICE: Royal Gorge Field Office

PROJECT NUMBER: DOI-BLM-F020-2016-0040-DNA

CASEFILE: COC67169

PROPOSED ACTION TITLE/TYPE: Drilling and completing horizontal lateral from existing wellbore

LOCATION/LEGAL DESCRIPTION: T7N, R64W Sec. 2

APPLICANT: Jack J. Grynberg

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

Grynberg Petroleum (Jack J. Grynberg) submitted a sundry notice requesting approval to plug back the existing Tiger Tail Federal 2-3 well to approximately 6300' TVD (true vertical depth) and drill and complete a horizontal lateral from the existing wellbore at that depth into the Niobrara formation, to a TMD (total measured depth) of 9524'.

The Tigertail Federal 2-3 well was drilled in August 2015, intended to be a vertical well completed in the Lyons formation. Conductor was installed and surface casing was set through useable water bearing zones, and the well was drilled to TD (total depth) however it was determined that the well would not be economically productive in the Lyons. It was never completed.

The proposed action will not result in additional surface disturbance, all activities would take place on the location (and through surface casing) that was constructed in order to drill the well, permitted by the BLM in the original APD for the Tiger Tail Federal 2-3. The APD was approved by the BLM on 5/20/2015, which was analyzed in EA document DOI-BLM-CO-F02-2015-0004 EA, whose FONSI and Decision Record were signed 5/18/2015. A new drilling plan was submitted with the sundry notice, which was reviewed and approved by the RGFO petroleum engineer.

The proposed action is subject to the terms and conditions (regulations, conditions of approval (COAs) and operator committed measures) contained in the previously approved APD. If necessary, additional COAs will be attached to the approval of the sundry notice.

B. Land Use Plan (LUP) Conformance

LUP Name: Northeast Resource Area Plan and Record of Decision as amended by the Colorado Oil and Gas Final EIS and Record of Decision (RD)	Date Approved 9/16/86 as amended 12/6/91
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The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

“672,000 acres of BLM-administered mineral estate within the Northeast Planning Area are open to oil and gas leasing and development, subject to lease terms and (as applicable) lease stipulations noted in Appendix A of this document.”

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.

DOI-BLM-CO-F02-2015-0004-EA

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).

None

D. NEPA Adequacy Criteria

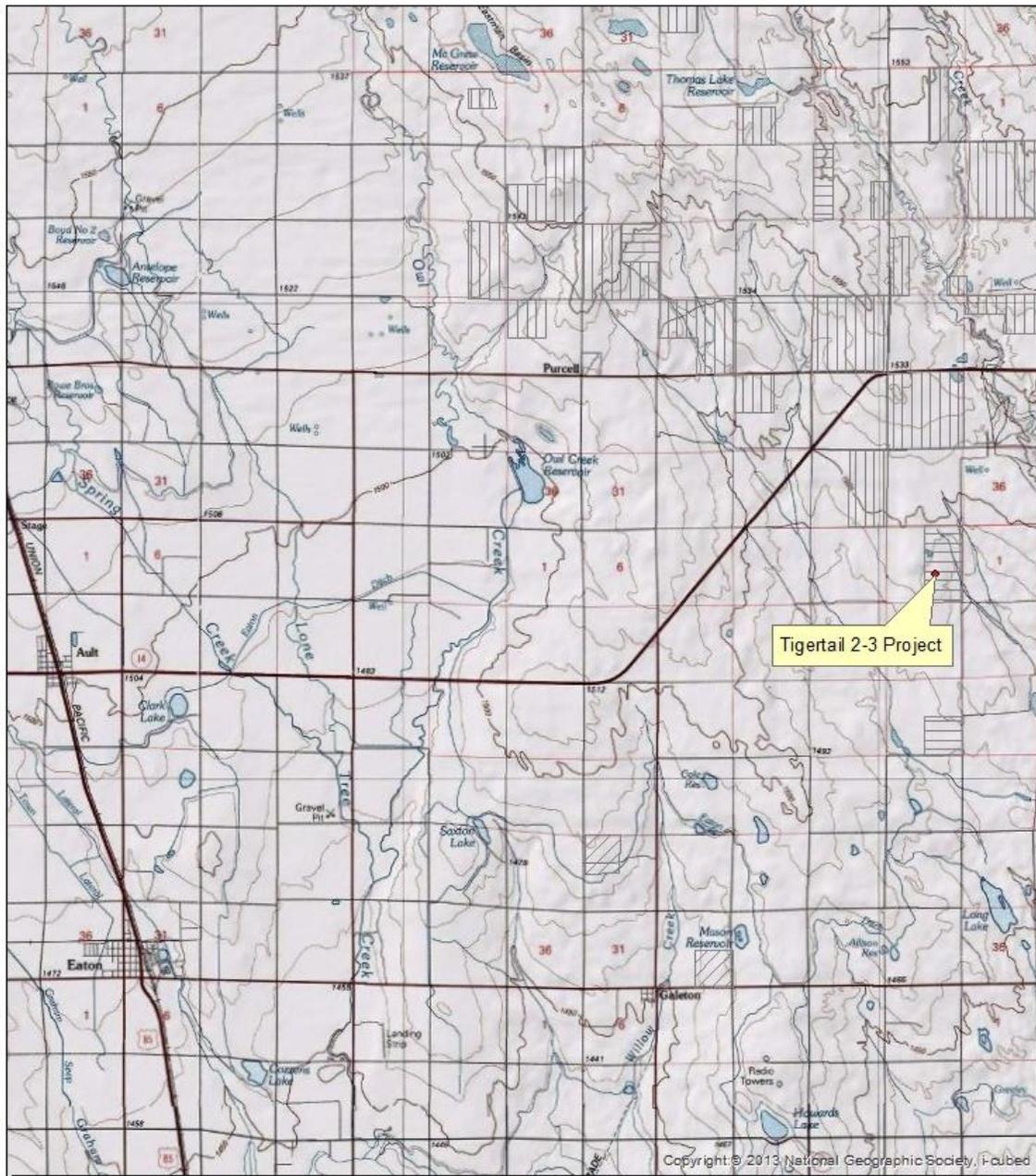
1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in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

The proposed action is similar to the proposed action in the EA, the only difference is a horizontal lateral will be drilled from the original wellbore. It is a common oilfield practice in the area. It will take place in the same surface location, from the existing wellbore analyzed in the proposed action of the EA, with no new surface disturbance.

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 values?

Yes, the range of alternatives in the existing EA is consistent with the proposed action for this DNA. The original proposed action in DOI-BLM-CO-F020-2015-0004 EA analyzed the vertical

well bore. The EA also analyzed a no action alternative. The only difference is this action involves additional drilling and completion procedures that is slightly more than what was specifically analyzed in the EA.



OVERVIEW MAP OF TIGERTAIL FEDERAL 2-3

DOI-BLM-CO-F02-2015-004 EA
6th PM, T7N R64W

◆ Proposed Well



NOTE TO MAP USERS
 No warrantee is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of the data layers shown on this map. The official land records of the data providers should be checked or current status on any specific tract of land.

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 circumstances would not substantially change the analysis of the new proposed action?

Yes, no new circumstances or information has come to light since the original EA.

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 impacts of the new proposed action are similar to the proposed action in the existing EA. Because the surface has been disturbed to build a pad and road (now existing), no new impacts from construction will occur from the new proposed action. The only direct, indirect and cumulative impacts from the new proposed action would be additional air emissions.

The air analysis for the existing EA calculated emissions based on a 9100' vertical well with little or no emissions associated with completion. Because this proposed action includes drilling an additional 3000' (approximately) horizontally and completing the well using hydraulic fracturing techniques, there will be additional exhaust emissions resulting from the drill rig and frac pump engines.

A screening assessment was run, using emissions estimates from the operator. The proposed action is de minimis from a general conformity standpoint, and meets the level of the NAAQS at 1000 m. These are short term impacts (1 day of running frac pump engines) and will not require any additional mitigation beyond what the EA required.

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

Yes, the original EA document was posted on the RGFO's NEPA website.

E. Persons/Agencies /BLM Staff Consulted

INTERDISCIPLINARY TEAM REVIEW			
NAME	TITLE	AREA OF RESPONSIBILITY	Initials/date
Aaron Richter	Natural Resource Specialist	Fluid Minerals	AR 5/25/2016
Chad Meister	Air Quality Specialist	Air Quality	CM 5/26/16

MITIGATION:

The mitigations in the EA, which were applied to the APD are sufficient.

CONCLUSION

DOI-BLM-CO-F020-2016-0040 DN

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.

SIGNATURE OF PROJECT LEAD: /s/ Sharon A. Sales

SIGNATURE OF NEPA COORDINATOR: /s/ Martin Weimer

SIGNATURE OF NEPA SUPERVISOR:/s/ Aaron Richter

SIGNATURE OF THE RESPONSIBLE OFFICIAL: /s/ Keith E. Berger
Keith E. Berger, Field Manager

DATE: 5/31/16

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.