

**UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BAKERSFIELD FIELD OFFICE
ENVIRONMENTAL ASSESSMENT**

**Chevron:
SUNDRY- Decommission 13 VRU's in Midway-Sunset
DOI-BLM-CA-C060-2017-0086-EA**

Chapter 1. Purpose and Need

PURPOSE AND NEED

Chevron, the Operator/Lessee submitted one Sundry Notice of Intent to decommission 13 Vapor recovery Units (VRU's), including vessels, FinFans, and associated pipelines within the Midway-Sunset lease, (CAS019382) in the Midway-Sunset Oil Field, in Section 22G, 23G, & 27G; T31S; 22E. This project is to permanently remove the equipment and pipelines. All work within this Sundry Notice will be above ground. No surface or habitat disturbance is expected as part of this project.

CONFORMANCE WITH BLM LAND USE PLANS

The proposed action falls within the Valley Management Area of the Bakersfield Resource Management Plan (RMP) approved on December 2014. This plan has been reviewed, and it has been determined that the proposed action conforms with the land use plan, terms, and conditions as required by 43 CFR 1610.5. The proposed action and modifications were specifically provided for in the following land use plan decision:

“Facilitate reasonable, economical, and environmentally sound exploration and development of leasable minerals while minimizing impacts to resources.”

Relationship to Statutes, Regulations and Other Plans

Oil and Gas Laws and Regulations

The BLM manages lands that contain a number of extractable minerals including oil and gas. These minerals are managed accordance with the *Mineral Leasing Act* of 1920, as amended; the *Mining and Minerals Policy Act* of 1970; the *Federal Onshore Oil and Gas Leasing Reform Act* of 1987; 43 CFR, Onshore Orders 1-8, NEPA; the *Energy Policy Act* of 2005; and other laws, regulations, orders, and also in accordance with all applicable state, county, and local laws and ordinances. BLM requires existing lessees to strictly adhere to all laws, regulations, and policies that govern oil and gas leases, while at the same time recognizing that existing leases grant the lessee certain rights. No additional requirements can be placed on an existing lessee that conflicts with the rights already granted to the lessee.

Onshore Order No. 1 identifies the requirements necessary for approving proposed oil and gas exploration, development, and servicing wells on all Federal and Indian oil and gas leases. This includes all components required for the management of fluid minerals including: completed Form 3160-3, well plat, drilling plan, surface use plan, bonding, operator certificate, onsite inspection, processing, reclamation, and Sundries. Onshore Order No.1 also identifies processing timelines and valid period of approvals.

Endangered Species Act

The Endangered Species Act of 1973 (ESA) requires federal agencies to complete formal consultation with the United States Fish and Wildlife Service (FWS) for any action that “may affect” federally listed species or critical habitat. The ESA also requires federal agencies to use their authorities to carry out programs for the conservation of endangered and threatened species.

BLM completed formal consultation with the FWS for the Bakersfield RMP; the proposed action is in accordance with provisions of the Bakersfield RMP Biological Opinion. Furthermore, if it is determined that a specific oil and gas project “may affect” listed species in Kern or Kings County, California, the action may be covered by the 2001 Oil and Gas Programmatic Biological Opinion (1-1-01-F-0063).

An applicant may choose or be required to complete separate formal consultation if a project is deemed out of scope with the 2001 Oil and Gas Programmatic Biological Opinion. This project will result in temporary disturbance to potential San Joaquin kit fox habitat and is therefore eligible for coverage under the 2001 Oil and Gas Programmatic Biological Opinion.

Clean Air Act

The San Joaquin Valley Unified Air Pollution Control District has state air quality jurisdiction over the project area. Section 176(c) of the Clean Air Act (CAA), as amended (42 U.S.C. 7401 et seq.) and regulations under 40 CFR part 93, subpart W, with respect to conformity of general Federal actions to the applicable State Implementation Plan (SIP) apply to projects within nonattainment and maintenance areas. Under those authorities “no department, agency or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan.” Under CAA 176(c) and 40 CFR part 93 subpart W, a Federal agency must make a determination that a Federal action conforms to the applicable implementation plan before the action is taken.

National Historic Preservation Act of 1966, as amended

Section 106 of the National Historic Preservation Act (NHPA) requires agencies to make a reasonable and good faith effort to identify historic properties that may be affected by an agency’s undertakings and take those effects into account in making decisions. The BLM process for implementing this NHPA requirement is set forth in the *State Protocol Agreement Among the California State Director of the Bureau of Land Management and the California State Preservation Officer and the Nevada State Historic Preservation Officer (2014)*.

Paleontological Resources Preservation Act (PRPA)

This Act was passed as part of the Omnibus Public Lands Management Act of 2009, and requires interior agencies as well as the Forest Service to manage and protect paleontological resources on Federal land. This includes developing plans for the inventory, monitoring, and scientific and educational use of paleontological resources. The Act also includes regulations on the qualifications required for obtaining a permit to collect and study paleontological resources on Federal land.

Clean Water Act

The Clean Water Act of 1977 establishes authority to regulate any action where pollutants may be discharged into waters of the United States.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 establishes a regulatory structure for the management and disposal of solid and hazardous wastes.

ISSUES AND SCOPING

Scoping was initiated internally with the Bakersfield Field Office staff. In addition, the project was listed on the BLM Bakersfield NEPA projects web list on May 10, 2017. As required, a BLM Onsite Inspection was completed on May 10, 2017 by Dave Faires, Natural Resource Specialist. A cultural resources inventory was conducted for all locations that could be directly or indirectly affected by the proposed project and no historic properties were discovered within the project area of potential effect.

Chapter 2. Proposed Action and Alternatives

ALTERNATIVE 1: PROPOSED ACTION

The BLM proposes to authorize Chevron to decommission 13 VRU's in the Midway-Sunset Oil Field as described in the Sundry Notice of Intent.

The project will be conducted in a manner that meets proper specifications for oil and gas production. The project will begin upon approval of Sundry Notice of Intent and is estimated to take 2 to 3 months to complete.

Project Design Features

The following design features were derived from stipulations/notices on the oil and gas lease, the Bakersfield RMP, the Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development, best management practices, and the *Sensitive Species Review Form* submitted with the Sundry Notice of Intent.

1. Follow approve work plan submitted by Chevron – **Midway-Sunset Vapor Recovery Unit Decommissioning project Description 05/13/2017.**
2. Follow all conditions in the attached: **Hazardous Materials Conditions of Approval – Vapor Recovery Unit Decommissioning, on the federal lease (CAS019382).**
3. In the event of inadvertent discovery of cultural resources during project implementation, the BLM Field Office Cultural and the BLM Field Manager (661-391-6000) shall be immediately notified by personnel responsible for the project. All work at the site of discovery, and in other locations where impacts to the discovery could occur, shall cease until written approval by the BLM.
4. In the event of inadvertent discovery of paleontological resources during project implementation, the BLM Field Office Paleontological Staff and the BLM Field Manager (661-391-6000) shall be immediately notified by personnel responsible for the project. All work at the site of discovery, and in any other locations where damage to the discovery could occur, shall cease until written approval by the BLM.

ALTERNATIVE 2: NO ACTION

BLM would not approve the Sundry Notice of Intent to decommission 13 VRU's in 22.

Chapter 3. Environment Analysis

This chapter presents both the affected environment and environmental consequences, by resource, for each alternative.

GENERAL SETTING

The project site is located on an existing oil processing facility and roadways. It is located within Section 22 lease on federal land in the Midway-Sunset Oil Field and is currently developed as an active oil field. Portions of the project site and adjacent areas are vegetated with non-native annual grasses and ruderal disturbed vegetative species including fiddleneck, ranchers fireweed, Mt. Diablo locoweed, saltbush, wild oat, black mustard, red brome, rip-gut brome, field bindweed, redstem filaree, broadleaf filaree, shiny peppergrass, common mallow, pineapple-weed, horehound, Mediterranean grass, common groundsel, perennial sowthistle, spiny sowthistle, and annual sowthistle. Common wildlife species observed at the project site include

common raven, western meadowlark, black-tailed jackrabbit, desert cottontail, and common side-blotched lizard.

Biological Resources

The project is proposed on BLM surface that occurs in high impact “White” habitat.

The NRS review of the site indicates that the project-specific field survey was not required. However, San Joaquin woolly-threads (*Monolopia congdonii*), California jewelflower (*Caulanthus californica*), and Bakersfield cactus (*Opuntia basilaris*) are not known to occur in the general project area; this determination is based on the *Recovery Plan for Upland Species of the San Joaquin Valley, California (Recovery Plan; U.S. Fish & Wildlife Service, 1998)*, the California Natural Diversity Database (CNDDDB), and nearby 2011 plant surveys by Quad Knopf. The project site is within a Hoover’s woolly-star site and will be monitored through the project to protect any potential impacts.

No giant kangaroo rat (*Dipodomys ingens*) were present on the site.

San Joaquin kit fox (*Vulpes macrotis mutica*) and San Joaquin antelope squirrel (*Ammospermophilus nelsoni*) are known to occur in the area, though no individuals or signs of these species were observed during the field survey.

Blunt-nosed leopard lizard (*Gambelia sila*) has a low potential to occur within the project area. It is believed that blunt-nosed leopard lizard inhabits the project location periodically, but it is unlikely to be found in this area following consecutive years of drought. Given the successive years of below-average precipitation, this species is not expected to be on the project site this year.

No sensitive plant species present.

This project “unlikely to affect” protected species due to the lack of disturbance from driving into and out of the work site and removing vegetation.

RESOURCE OR ENVIRONMENTAL ELEMENTS CONSIDERED BUT NOT ANALYZED:

The following elements of the human environment were considered but determined to be either not present or unaffected by the alternatives and will therefore not be addressed further in this analysis:

<i>Environmental Element:</i>	<i>Reason not addressed:</i>
<i>Air and Atmospheric Values</i>	Chevron proposes to implement this project utilizing a system of established roads and disturbed areas. This would require no extra soil disturbance that could contribute to fugitive dust emissions and entrainment PM emissions within the direct project area and the San Joaquin Valley Air Basin. Use of heavy motorized equipment and associated emissions would be insignificant at a local, regional, and global scale due to the small scale of the project. Therefore, emissions from dust and mobile sources are clearly below <i>de minimus</i> , not requiring a conformity determination, because they conform to the applicable State Implementation Plan.
<i>Area of Critical Environmental Concern (ACEC)</i>	There are no ACECs within the vicinity of the project.
<i>Cultural Resources</i>	Cultural resource survey was completed for the project area and no cultural resources are located within the area of potential effect (BLM Cultural Resource Inventory Report # 6000-2015-30). In addition, it was determined that all of the infrastructure proposed for removal is either less than 45 years of age or of such condition due to continued use that original integrity has been diminished.
<i>Paleontological Resources</i>	No surface disturbance is required for this project therefore no impacts to paleontological resources are foreseen to occur.
<i>Environmental Justice</i>	There are no Environmental Justice populations on or near the project site.
<i>Essential Fish Habitat</i>	There is no essential fish habitat designated on or downstream of the project site.
<i>Farmlands, Prime or Unique</i>	Soils within the project site are classified as Prime or Unique Farmlands. No portion of this project would impact soils there will be no impacts to the farmland.
<i>Floodplains</i>	There are no Floodplains within this proposed project site.
<i>Invasive, Non-native Species</i>	No new invasive or non-native species were found on the proposed project site.
<i>Lands With Wilderness Characteristics</i>	Based on the Bakersfield Field Office Proposed RMP/FEIS, Map 2.8; the project area does not

<i>Environmental Element:</i>	<i>Reason not addressed:</i>
	contain lands possessing or proposed to be managed for the protection of wilderness characteristics.
<i>National Landscape Conservation Systems Units: National Monuments, National Trails, Wilderness, Wild and Scenic Rivers</i>	The project vicinity does not contain these NLCS units.
<i>Native American Values</i>	Due to the nature and location of the proposed project within a highly developed oil field among existing infrastructure, there will be no impact to Native American values.
<i>Recreation</i>	The proposed project is on federal land and therefor is open to recreation. However, it is within heavily developed oil field and would not be anticipated for recreational use.
<i>Soils</i>	No new soil disturbance will occur.
<i>Water Quality</i>	No rivers, lakes or streams are located near this proposed site.
<i>Wetlands/Riparian Zones</i>	There are no wetlands or riparian zones in the project site or buffer area.
<i>Wild Horses and Burros</i>	No wild horse and burro management units occur in the project area.
<i>Waste, Hazardous or Solid</i>	No hazardous materials are expected to be removed as part of this proposed project.
<i>Grazing</i>	This project is within grazing allotment. However, there is no new permanent disturbance with this project and therefore, no impacts the grazing allotment.

Follow all conditions in the attached: **Hazardous Materials Conditions of Approval – Chevron North America Hazardous Materials Conditions of Approval – Hazardous Materials Conditions of Approval – Vapor Recovery Unit Decommissioning, on the federal lease (CAS019382).**

Chapter 4. Environmental Impacts

Biological Resources

Proposed Action:

Oil and chemical spills are unlikely to impact special status species within the vicinity of the project area. All spills would be promptly cleaned up in accordance with Chevron's spill

contingency plan, 43 CFR 3160, the Oil and Gas Onshore Orders, and the Project Specific Provisions of the 2001 Oil and Gas Programmatic Biological Opinion.

No Action:

There would be no impacts to vegetation or wildlife within the project area as a result of the no action alternative. However, the rejection of the Sundry would not alter the trajectory of listed species populations relative to Sundry approval because the amount of disturbance is inconsequential on a regional scale.

CUMULATIVE IMPACTS

Biological Resources

No direct impacts to threatened and/or endangered species are expected,

Chapter 5. Consultation and Public Involvement

PERSONS, GROUPS, AND AGENCIES CONSULTED

LIST OF PREPARERS

Name	Title	Organization
Dave Faires	Natural Resource Specialist	BLM
Tamara Whitley	Archaeologist	BLM

List groups, Tribes, individuals, agencies contacted

ID Team Member	Title	Organization
Dave Faires	Natural Resource Specialist	BLM
Denis Kearns	Botanist	BLM
Tamara Whitley	Archaeologist	BLM
John Hodge	Assistant Field Manager-Minerals	BLM
Matthew Fesko	Project Manager	Chevron

Chapter 6. References

BLM Cultural Resource Inventory Report # Resource Inventory Report # 6000-2015-30.Class III Inventory for Section 22, Midway Sunset Oilfield. Janice Offermann, AECOM, 2015. On file in the Southern San Joaquin Valley Information Center and the BLM Bakersfield Field Office.

Bakersfield Resource Management Plan, December 2014.

Bureau of Land Management (BLM) 2007. Potential Fossil Yield Classification (PFYC) System for Paleontological Resources on Public Lands. Instruction Memorandum No. 2008-009, released October 15, 2007.

Bureau of Land Management (BLM), 2016. Potential Fossil Yield Classification (PFYC) System for Paleontological Resources on Public Lands Instruction Memorandum No. 2016-124, released July 20, 2016.

San Joaquin Valley Air Pollution Control District (SJVAPCD) (online). 2010. Current District Rules and Regulations. Available at: <http://www.valleyair.org/rules/1ruleslist.htm>

U.S. Department of Agriculture, National Resources Conservation Services, 2007. Soil Survey of Kern County, California, Northeastern Part and Southeastern Part of Tulare County, California. Prepared by Soil Conservation Service in cooperation with the regents of the University of California. U.S. Government Printing Office, 2007.

U.S. Department of the Interior, Bureau of Land Management (BLM), 2014. Bakersfield Resource Management Plan. U.S. Government Printing Office, December 2014.

U.S. Environmental Protection Agency (EPA), 2004. Guidance Document Reasonable and Prudent Practices for Stabilization (RAPPS) of Oil and Gas Construction Sites. Prepared by Horizon Environmental Services, Inc. April 2004.

U.S. Fish and Wildlife Service (USFWS). 1998. Recovery Plan for Upland Species of the San Joaquin Valley, California.

U.S. Fish and Wildlife Service (USFWS). 2001. Revised Formal Consultation on the Oil & Gas Programmatic Biological Opinion in Kings and Kern Counties, California (1-1-01-F-0163). September 28, 2001.

Hazardous Materials Conditions of Approval – Chevron North America Hazardous Materials Conditions of Approval – Hazardous Materials Conditions of Approval – Vapor Recovery Unit Decommissioning, on the federal lease (CAS019382).

1. Chevron North America presented to BLM on May 10, 2017 a Sundry Notice proposing to decommission 13 Vapor recovery Units (VRU's), including vessels, FinFans, and associated pipelines within the Midway-Sunset lease). This project is to permanently remove the equipment and pipelines. All work within this Sundry Notice will be above ground. No surface or habitat disturbance is expected as part of this project.
 - a. Any vessel(s) identified as containing Asbestos in excess of (1%) and/or lead paint which is regulated in the State of California; Chevron must assure these hazardous materials are removed, transported and disposed of, in full compliance with all federal, state and local regulations.

2. Receive the BLM approved Sundry Notice
 - a. Read all sections of the Sundry Notice in their entirety, including all of the Conditions of Approval (COAs).
 - b. Provide complete copies to the operator's field personnel responsible for the project and assure that they are familiar with the Conditions of Approval and the Biological Opinion if it has been issued on this project.
 - c. If the operator is unable or unwilling to proceed with the project as specified in the COA's, immediately contact BLM and schedule a conference to discuss the Project.

3. The operator shall conduct due diligence in full and complete compliance with all Federal, State or local laws and regulations. The operator shall be responsible for obtaining any demolition and abatement permits and paying any fees required for the project. The operator will file all reports and manifests with regulatory agencies as required by law.
 - a. All asbestos in these vessels will be abated in full compliance with the relevant Air Pollution Control Board regulations.
 - b. All lead paint on these vessels will be controlled in full compliance with Cal OSHA and Federal OSHA regulations.
 - c. Any hazardous materials present in the vessels will be removed and manifested in full compliance with federal and state RCRA and CERCLA laws and regulations.
 - d. As needed, contact the local Underground Service Alert Services (USA) or any other utility alert group to request the identification of underground utilities to be avoided in the subsurface demolition work.

4. Care should be taken concerning volatile emissions during decommission and stockpiling of this material. Lower Explosive Limit readings should be taken before and during all operations to assure worker safety. The operator will be responsible for controlling the volatile air emissions of all hazardous materials and particulate matter during the excavation, mixing or application of materials to the public land. All Federal, State and County regulations shall be observed all phases of the operation.
5. Remove the any oily sediments and waste from the vessels. Demolish and remove the metal, wood or plastic vessels.
6. **Submit a Subsequent Sundry Notice and Report on the Vessels, Form 3160-5 within 30 days of the completion of on-site activities – check the Subsequent Report Box. Include in this report a summary of the weights, volumes and disposal locations of all wastes removed (asbestos containing materials, lead paint debris, scrap steel, concrete, oily soils, oily tank bottoms, etc.)**
7. At completion of the project, any and all obsolete and unused pipelines, valves, pumps, manifolds, concrete pads, electrical conduit, poles, welding rods, insulation, nuts, bolts and any other junk and trash not needed for future operations of this facility will be removed for disposal off the lease in an appropriate facility.
8. The operator shall take the non-hazardous oily sediments and waste and the non-hazardous oily soils from this project to an operator owned road mix facility. These sediments and soils are to be returned to the federal lease of origin for berm reinforcement or road mix within twelve months of approval of this Sundry Notice.
9. Non-hazardous oily impoundment bottoms or soils may be removed for use off the lease only if they are purchased from BLM or are offset by the exchange of an equal amount of fill material from off the lease. Contact the BLM Solid Minerals representative at (661) 391-6000 to arrange for purchase of the solid mineral material prior to removal of these soils from the lease.
10. All materials determined to be hazardous shall be removed from the lease using a Hazardous Waste Manifest and taken to an EPA approved Treatment Storage or Disposal site. Any on-site treatment of hazardous materials must receive prior written approval from BLM and the appropriate State or local health authorities.