

**Bureau of Land Management  
Pinedale Field Office**

**Commitments Made in Decision Documents  
not yet Achieved**

**Opportunities for Improvement**

**May 2006**

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# Commitments Made in Decision Documents not yet Achieved

## Introduction

The intent of this document is to present a summary of the commitments and requirements BLM has made in recent years, specifically the Jonah Field and the Pinedale Anticline. Several documents have been prepared pursuant to NEPA to analyze the impacts of oil and gas activity within the Pinedale Planning Area, specifically the Pinedale Anticline and the Jonah Field. Nearly 580 requirements and commitments have been made in these decision documents. These decision documents and number of commitments are as follows:

Document	Date	Number of Commitments
McMurry Oil Company Jonah Prospect Field Natural Gas Development (JPFNG) Decision Record and Finding of No Significant Impact	Aug-94	40
Record of Decision Jonah Field II Natural Gas Development Project (JF 2)	Apr-98	61
Decision Record for the Modified Jonah Field II Natural Gas Project (MJF2)	Jun-00	23
Record of Decision of the Pinedale Anticline Oil and Gas Exploration & Development Project.	Jul-00	191
Decision Record for Questar Year-Round Drilling Proposal	Nov-04	71
Decision Record for Questar Year-Round Drilling Proposal-Condensate Pipeline Modification	Jul-05	77
Decision Record for the Jonah Field Experimental Well Pad Development Techniques Project (JFWDT)	Sep-05	40
Decision Record for ASU Year-Round Drilling Demonstration Project	Sep-05	11
Decision Record for Questar Year-Round Drilling Addendum	Nov-05	15
Record of Decision Jonah Infill Drilling Project	Mar-06	50

Most of these requirements pertain to the Operators. However, some of these requirements are BLM obligations. This document will not present the many requirements of these decision documents that have been met, but will highlight those requirements that have not yet been achieved.

## **Prominent Example**

One of the more prominent commitments BLM made was to track NO<sub>x</sub> emissions for southwest Wyoming in the Record of Decision for the Jonah Field II Natural Gas Development Project, in 1998. A Letter of Agreement for Tracking Nitrogen Oxide Emissions with WDEQ dated June 20, 1997 is referenced in this ROD. The importance of this tracking was to determine if and when the emissions reached 977 tons per year above

the January 1, 1998 levels<sup>1</sup>. If this level was reached, BLM would notify EPA, the USDA Forest Service, and the WDEQ that further emissions may have an adverse impact on air, determine visibility impacts through additional modeling and produce additional documentation that may be required under NEPA. Total NOx emissions for Jonah II were to be kept below 158.6 tons per year to achieve the USDA-Forest Service's 0.5 deciview visibility Limit of Acceptable Change.

The commitment to track NOx emission was again made in the Record of Decision of the Pinedale Anticline Oil and Gas Exploration & Development Project in 2000. Total NOx emissions were to be kept below 693.5 tons per year to ensure that permitted emissions did not exceed the Pinedale Anticline EIS scope of analysis.

Tracking of NOx emissions was performed out of the Rock Springs Office until early 2000's. From that time to the present, NOx tracking has not been done by BLM. Recently members of the PAWG and the Air Quality Task Group of the PAWG, have been requesting the tracking data from BLM. As explained above, recently the data has not been tracked by BLM. The data must be recreated. Susan Caplan and Ken Peacock are working on this issue.

Tracking of emissions in the Pinedale Field Office area was committed to again by BLM in the Jonah Infill ROD (p A-3). BLM will track numbers of wells, number of drill rigs, drilling emissions, and compressor stations. WDEQ-AQD will track permitted emissions. Operators will provide the BLM with information on their drill rigs, including drilling days, horsepower, load factors, and emission factors within 10 days of the completion of drilling operations for each well.

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<sup>1</sup> This was the level of concern agreed to by the WDEQ, EPA, USDA-Forest Service and BLM for Jonah and was determined to be no longer meaningful in the Pinedale Anticline EIS (ROD page 17).

## Summary of Commitments not yet Achieved

<b>Pinedale Anticline</b>	
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### PAPA ROD

Several requirements were made in the **Pinedale Anticline Oil and Gas Exploration and Development Project Record of Decision** that are not measurable, have not been implemented, or are not being met. These are as follows:

Commitment	Status	Recommendation
<p>"In accordance with the Joint Agreement between the BLM, Wyoming DEQ, USDA-Forest Service, and the Environmental Protection Agency, in maintaining diligence in the monitoring for the protection of wilderness air quality related values of visibility and lake acidification, the BLM, in consultation with the Wyoming DEQ-AQD, will track emissions for the Pinedale Anticline and the Jonah II projects on an annual basis." (p. 6, 17,43)</p> <p>"General transportation plans for the PAPA will be reviewed with the Transportation Planning Committee (TPC) in accordance with the TPC Memorandum of Understanding..."</p>	<p>This has not been done since 2000. Susan Caplan, Vickie Mistarka, and Ken Peacock are working to resolve this.</p> <p>TPC does not exist. Morphed into Transportation Task Group. FACA issue.</p> <p>TPC does not exist. Morphed into Transportation Task Group. FACA issue.</p>	<p>Continue to work to provide the data. Initiate discussions with WDEQ to determine if the tracking is still necessary.</p> <p>Resurrect the TPC. The TPC has jurisdiction beyond the Task Group. The Task Group is limited to the PAPA.</p> <p>Resurrect the TPC. The TPC has jurisdiction beyond the Task Group. The Task Group is limited to the PAPA.</p>
<p>"The Transportation Plan (Appendix B) and associated Technical Support Document will be reviewed and updated annually to incorporate new information." (p.9)</p>	<p>TPC does not exist. Morphed into Transportation Task Group. FACA issue.</p>	<p>Resurrect the TPC. The TPC has jurisdiction beyond the Task Group. The Task Group is limited to the PAPA.</p>
<p>"The public group will review the plans for adequacy and recommend where additional monitoring may be necessary before any of the plans are implemented." (p. 15)</p>	<p>Not sure if this occurred. The public group is the PAWG.</p>	<p>PAWG minutes need to clearly state that the plans were reviewed for adequacy.</p>

<p>Regarding the Transportation Planning Committee, "All parties agree to meet at least twice a year to discuss transportation related issues. One of the required meetings shall be held between mid-January and 1<sup>st</sup> of February each year. Meetings may be held more often if agreed to by the committee. The TCP will review general road and pipeline transportation plans. Not every road, pipeline, or access road associated with an Application for Permit to Drill (APD) will be passed before the TPC. If there is an issue associated with a proposed road, pipeline, APD access road or other right-of-way, the TPC will conduct a review and recommend a solution. The Oil/Gas Operators will present their drilling, road, pipeline, and other construction plans to the TPC during the annual meeting (mid-January- February 1<sup>st</sup>)."<sup>2</sup> (p.16)</p>	<p>Meeting minutes do not clearly state that this occurred.</p> <p>TPC does not exist. Transportation Task Group assumed this role. Operators are not providing the annual information.</p>	<p>Minutes also need to capture if PAWG has recommended any additional monitoring.</p> <p>Resurrect the TPC. The TPC has jurisdiction beyond the Task Group. The Task Group is limited to the PAPA. Encourage operators to provide data.</p>
<p>"If activity and corresponding emission assumptions and/or impacts exceed those identified in the Pinedale Anticline EIS (376.59 tons/year of NOx emission from compressors or 693.5 tons/year NOx emissions from the combination of Construction/Drilling, well production, and compression), the BLM, in cooperation and consultation with Wyoming Department of Environmental Quality-Air Quality Division (DEQ-AQD), EPA Region VIII, USDA-Forest Service, and other affected agencies, will undertake additional cumulative air quality environmental review as required by CEQ regulations 40 CFR 1502.9(c)(1)(ii)."<sup>2</sup> (p. 16)</p> <p>"Monitoring and emissions tracking for the protection of wilderness air quality related values of visibility and lake acidification will continue and reporting will be done on an annual basis."<sup>2</sup> (p. 17)</p>	<p>The level has been exceeded.<sup>2</sup> Tracking did not occur.</p>	<p>Continue to work to provide the data. Initiate discussions with WDEQ to determine if the tracking is still necessary.</p>
<p>Beginning in December 2000, because of their proximity to the Bridger</p>	<p>Tracking did not occur.</p>	<p>Continue to work to provide the data. Initiate discussions with WDEQ to determine if the tracking is still necessary.</p>
<p>Beginning in December 2000, because of their proximity to the Bridger</p>	<p>Tracking did not occur.</p>	<p>Continue to work to provide the data. Initiate discussions with WDEQ to determine if the tracking is still necessary.</p>

<sup>2</sup> See Questar Year Round Drilling EA page 3-20 to 3-21 for discussion of NOx emissions.

<p>Wilderness boundary, the Pinedale Anticline and Jonah II projects will be monitored individually, in addition to the BLM Rock Springs, Pinedale and Kemmerer Field Offices report, on an annual basis. The BLM will track and report on actual on-the-ground calculated potential NOx emissions (i.e. the level of NOx emission from permitted, actually constructed/installed facilities based upon the permitted level of emissions per well location, compressor facility, etc.) for the Jonah II and Pinedale Anticline project areas." (p. 17)</p>	<p>the data. Initiate discussions with WDEQ to determine if the tracking is still necessary.</p>
<p>"In selecting a new site for a compressor facility or other long-term facility causing an increase in noise, the distance from the edge of a sage grouse lek shall be sufficient to limit any increased noise at leks during their use period to no more than 10 decibels (dBA) above background (i.e. 39 dBA background + 10 dBA)." (p. 19)</p>	<p>Unknown. Noise studies conducted in 2005; ongoing.</p>
<p>"Patrols by BLM will be increased to deter illegal collection of cultural materials." (p.22)</p>	<p>Unknown. Though not in the PAPA, patrols had been increased at the Wardell site and volunteers were used to watch the site.</p>
<p>"Limit surface disturbance and human activity which could displace deer and antelope from winter ranges and sage grouse from strutting and nesting habitat resulting in mortalities and reduced population levels (MA 5)." (p. 31)</p>	<p>Recent studies show a decline in the number of mule deer using this habitat and a decline in the number of sage grouse using leks (several leks have been completely abandoned). Questar has started piping condensate and water.</p>
	<p>Work with ranger to determine if patrols have been increased. Determine a method to track and document that patrols have been and continue to be increased.</p>
	<p>We have been able to reduce surface disturbance. We do not need to limit human activity, rather the impacts of human activity. Identify specific impacts from year round drilling and have the operators propose methods of reducing these impacts in another demonstration project.</p>

<p>“Protect this area from unnecessary surface disturbance and human activities which could displace sage grouse from crucial strutting and nesting habitat resulting in mortalities and reduced population levels (MA 6).” (p. 32)</p>	<p>Directional drilling and centralized production facilities are being used as well. Year round drilling has reduced the amount of surface disturbance (ASU EA). Unknown. Eight well pads per square mile on average are allowed, and currently, development is below this level. Year round drilling is reducing surface disturbance. Unknown.</p>	
<p>“Maintain antelope summer range and avoid activities and facilities that will create barriers to the seasonal movements of antelope (MA 8).” (p. 33)</p>	<p>Need to find methods to reduce impacts of human activity. However, current research shows that more than 1 well per section affects grouse and lek numbers decline.</p>	
<p>“The operators, in consultation with representatives from BLM, WGFDD, USFWS, and other interested groups... will prepare and adhere to a Wildlife Monitoring/Protection Plan for this project.” (p. A-18)</p>	<p>No information has been submitted.</p>	<p>This is subjective and very difficult to measure and thus difficult to attain. Determine if a Wildlife Monitoring/Protection plan for this project prepare by the operators is necessary. Wildlife Task Group has prepared a Monitoring Plan.</p>
<p>“To minimize wildlife mortality due to vehicle collisions, operators should advise project personnel regarding appropriate speed limits, minimize poaching, obey wildlife laws.” (p. A-18)</p>	<p>No information has been submitted. There was no requirement for information to be submitted.</p>	<p>Have operators provide documentation that project personnel are being advised.</p>
<p>“BLM will begin the process of evaluating the Mount Airy and Desert General “open” ORV designations and update the Pinedale RMP to</p>	<p>BLM is in the process of revising the RMP.</p>	

<p>restrict all ORV use to existing roads and trails.” (p. A-24)</p> <p>“Where deemed appropriate by the AO, the alignment of the sales pipeline(s) in portions of the existing corridor may be buffered so that the pipeline rights-of-way do not remove all the native vegetation between the pipelines. By maintaining a native vegetation buffer of about 10 to 15 feet between the pipelines, an important seed source for the establishment of shrub species will be maintained (MacDonald, 1999)” (p. A-29)</p>	<p>The native vegetation buffer is not being maintained.</p>	<p>Documentation of why the buffer is not being maintained, and why the AO is not requiring it is needed. PFO generally wishes to consolidate disturbance by having the pipelines as close as possible.</p>
<p>“The BLM, in cooperation with the operators and livestock permittees, will establish a monitoring program to insure that development and reclamation within the grazing allotments and watersheds in the PAPA meet the Standards for Healthy Rangelands.” (A-30)</p>	<p>Development of monitoring protocols will be ongoing and incorporate adaptive management approach.</p>	<p>Work with operators and livestock permittees to develop this monitoring program.</p>
<p>The following monitoring requirements will be incorporated into a Wildlife Mitigation and Monitoring Plan for the PAPA which will be prepared and implemented within 1 year and the cost of these programs will be borne by the operators: 1) Wildlife habitat models revised with new biological information, 2) GIS layers, 3) digitized roads, pads etc, 4) identify site-specific mitigation opportunities, 5) expand monitoring of traffic volume, 6) monitor biological sites and events, 7) monitor revegetation, and 8) monitor level of development to ensure consistency with the scope of the EIS. (A-33)</p>	<p>The monitoring plan was prepared but it is not being implemented. The operators have recently supplied BLM with some digitized data. Contractor preparing the SEIS has digitized most of the Anticline.</p>	<p>Implement the plan or clearly state reasons for not implementing the plan.</p>
<p>Operators will submit all location information regarding pads, roads, pipelines, etc. in a format compatible with GIS analysis.</p>	<p>Some information has been received.</p>	<p>Ensure operators continue to submit data.</p>

### Questar Year-Round Drilling DR

For the 2004 Questar Year-Round Drilling EA the following commitments were made in the decision document and have yet to be achieved.

Commitment	Status	Recommendation
Questar will fully implement the applicant-committed mitigation measures, management objectives, conditions of approval, and standard stipulations, as described in the PAPA EIS ROD, except as modified by this decision, by November 15, 2005. (p. 2, 9)	Some implemented but not all. BLM has issued Orders of the Authorized Officer directing Questar to implement the Appendix A requirements and has issued several INCs.	Continue to follow up with Questar.
Maintain or improve the integrity of sagebrush habitat to sustain or increase the number of male sage-grouse on leks and numbers of sagebrush-obligate listed and sensitive species. (p. 9)	No information is available.	This is subjective and difficult to measure.
Maintain or improve currently active big game migration routes. (p. 9)	No information has been submitted.	This is subjective and difficult to measure. It is not within the authority of BLM in some cases.
Questar will inventory greater sage-grouse seasonal habitats within the leasehold not already inventoried by BLM or WGFD within 1 year of the date of this DR; GIS data will be provided to BLM, WGFD, and PAWG with FDGC-compliant data. (p. 11)	Not completed. BLM has issued Orders of the Authorized Officer directing Questar to implement the Appendix A requirements.	Continue to follow up with Questar.

<p>In coordination with BLM and WGFD, Questar will monitor winter pronghorn movement within the leasehold. (p. 13)</p>	<p>No information has been submitted.</p>	<p>No information has been submitted. WWC started a project but actually Shell paid for it.</p>
<p>Questar may be required to make payment to the Colorado River Endangered Fish Recovery Program to compensate for water withdrawals from the Colorado River System. (p. 13)</p>	<p>No information has been submitted.</p>	<p>No information has been submitted. This should have been completed. The USFWS is in charge and BLM has not received records.</p>

### Questar Condensate Pipeline DR

For the subsequent **Questar Condensate Pipeline Decision Record**, documentation on the following have not yet been submitted so BLM can verify that the commitment is achieved.

Beginning in the winter of 2005-06, Questar will implement an expanded mule deer research study to determine impacts of winter drilling on mule deer populations. Questar must implement that research by November 15, 2005 (p. 2). *This study is being implemented we do not have the updated report yet for 2005-06.*

Questar must implement the Questar Year-Round Drilling Proposal Decision Record and its Appendix A, and the applicant committed mitigation measures, except where modified by this Decision Record. (p. 2)

Movement of rigs off winter drilling pads after April 30 of any year will be allowed only if the receiving pad does not have seasonal or other stipulations preventing movement of a rig onto the receiving pad, or unless an exception for the receiving pad has been applied for and granted. (p. 10)

Well completions in MA 5 will be prohibited between November 15 and April 30, and will be prohibited between May 1 and July 15 unless a sage-grouse nesting stipulation exception is granted on a site-specific basis, pending results of sage-grouse nesting surveys near the site. (p. 10)

Questar will continue to assist BLM and WGFD in monitoring sage-grouse movements to determine if populations are migratory. (p. 10)

Questar and QGM will monitor noise near noise sensitive resources as identified by BLM. (p. 10) Note: partial noise data was obtained from monitoring at one well pad. The data was submitted in March 2006.

Questar and QGM will monitor water use and provide annual depletions reports to BLM and USFWS. (p. 10)

Questar will submit to BLM, WGFD, and PAWG, by January 1, 2006, a wildlife / habitat mitigation plan, developed in consultation with BLM and WGFD. (p. 11)

### Addendum to the Questar Year-Round Drilling DR

In 2005 an **Addendum to the Questar Year-Round Drilling EA** was done. These commitments were made in that decision document and no information has been submitted yet:

Questar will implement the Questar Year-Round Drilling Proposal Decision Record November 2004, and new mitigation attached to this document. (p. 11)

Provide mule deer habitat enhancement on 250 acres in addition to the 1500 acres of enhancement work currently required. (p. 12) Note: Archaeology requirements have been completed on proposed projects for 2006.

## **Jonah Field**

Several documents have been prepared for the Jonah Field. Most recently, the Jonah Infill EIS was completed and the Record of Decision was signed in March 2006. This Record of Decision supersedes the other decision documents with the exception of the JFWDT.

### **JFWDT DR**

Specific requirements were included in the **JFWDT decision record** of 2005. These are:

EnCana will research and monitor the Proposed Action as described in Attachment 1 and provide appropriate technical reports to the BLM.

EnCana will provide a technical report to the BLM on the following dates:  
11/1/2006, 11/1/2007, and 11/1/2010.

EnCana will be required to fully implement the performance-based development and production objective, Conditions of Approval, mitigation, monitoring, and Best Management Practices listed in the J2EIS and MJ2EA.

Monitoring, sampling, and soil compaction testing for the project will be completed by a 3rd party contractor, chosen and funded by EnCana and approved by the BLM.

An inventory for each of the monitored resources will be conducted before disturbance, to provide baseline data throughout the project.

### **Jonah Infill ROD**

The Jonah Infill ROD, signed March 2006, contains numerous requirements in Appendix A. The ROD was signed in March 2006. Mike Stiewig, JIO, has developed a list of requirements and deliverables. To date BP and Encana have complied with providing BLM with information on their drill rigs, including drilling days, horsepower, load factors, and emission factors, within 10 days of the completion of drilling operations for each well.

### Previous Jonah Decisions

Prominent commitments made in the previous Jonah documents that may not have been achieved are as follows:<sup>1</sup>

Document	Commitment
JPFNG DR	McMurry will be required to implement an educational program to inform employees about laws and fines for illegal collecting of artifacts.
JPFNG DR	McMurry will be required to inform employees on proper procedures should [paleontological resources] be uncovered
JPFNG DR	A study of reclamation success will be conducted to determine topsoiling standards.
JPFNG DR	The authorized officer (AO) will monitor construction and operational activities and if deemed necessary, require McMurry to implement dust-abatement measures.
JPFNG DR	Reclamation success will be evaluated annually by personnel representing BLM and McMurry.
JPFNG DR	On-site monitoring by the survey botanist and BLM Authorized Officer to avoid or lessen impacts to Special Status Plant populations. All survey reports and recommendations for avoidance or other mitigation should be evaluated and approved by the BLM Botanist or Special Status Plant Coordinator prior to construction activity.
JPFNG DR	The project proponent will cooperate with the BLM on project component surveys during nesting periods to detect the occurrence of raptors, sage grouse, loggerhead shrikes, mountain plover, or other species of interest as identified by the AO. All data collected will be submitted to USFWS and/or WGFD for their review.
JPFNG DR	Should special status plant species be located during these surveys on or near surface disturbing activities, the BLM would require implementation of the following mitigation measures as appropriate, to reduce or alleviate the severity of impacts to Special Status Plant species:.. On-site monitoring by the survey botanist and BLM Authorized Officer to avoid or lessen impacts to Special Status Plant populations.
JF2 ROD	If activity and corresponding emission assumptions and impacts exceed those used for the analysis, the BLM, in cooperation and consultation with WDEQ, EPA, Forest Service and other affected agencies, will undertake additional cumulative air quality environmental review as required by CEQ regulation 40 CFR 1502.9(c)(1)(ii).
JF2 ROD	Operators will cooperate with BLM and WDEQ in determining when or if NOx emission levels, from all activities within the BLM Rock Springs District (including Jonah II, Moxa Arch, Fontenelle, Stagecoach Draw, and Jonah development areas), reach 977 tons per year above January 1, 1996 levels. If this level of emission is reached, BLM will notify EPA, USDA Forest Service, and the WDEQ that further emission may have an adverse impact on air quality related values.

<sup>1</sup> It appears that all commitments made in the MJF2 DR were achieved; therefore MJF2 does not appear on this list.

JF2 ROD	Further, BLM, consistent with its letter of Agreement for Tracking Nitrogen Oxide Emissions with WDEQ dated June 20, 1997, in cooperation and consultation with WDEQ, EPA, Forest Service, and other affected agencies, will continue to track air quality in the affected region, and will verify the level of emissions, determine the visibility impacts through additional modeling, and determine whether unanticipated visibility impacts are predicted or occurring in order to produce additional documentation that may be required under NEPA.
JF2 ROD	If visibility impacts are determined to be greater than predicted 977 tons of NOx and/or if increased contributions of other pollutants result in higher emission levels than stated in the BLM's cumulative air quality impact analysis, then BLM will conduct additional NEPA analysis and/or additional monitoring.
JF2 ROD	Jonah II Project Area emissions will be tracked as a subset of the current tracking agreement.
JF2 ROD	Based upon SWYTAF's recommendations, operators may be required to cooperate in the implementation of a coordinated air quality monitoring program.
JF2 ROD	Operators will assist BLM in the monitoring of reclaimed areas for successful revegetation.
JF2 ROD	BLM will work with the Operators, ranchers, WGFD, and other interested parties to determine the need for and location of additional water sources to enhance seasonal use of the area by pronghorn and sage grouse.
JF2 ROD	The inventory and monitoring of wildlife and wildlife use will be conducted as specified in the Wildlife Monitoring/Protection Plan (Appendix D). Appropriate management actions will be taken to further protect wildlife and their habitats as deemed necessary.
JF2 ROD	Annual field evaluations for sage grouse leks will be conducted by a qualified biologist provided by the BLM or the Operator prior to the start of activities in potential sage grouse lek habitat between February 1 and May 15.
JF2 ROD	Suitable mountain plover habitat within 0.25 miles of proposed well locations and within 300 feet of proposed roads will be surveyed prior to disturbance to detect the presence of plovers if the disturbance will occur between March 15 and August 15.
JF2 ROD	BLM will consult with the Native Americans to identify areas of importance to them and then steps will be taken to avoid those areas as much as possible.
JF2 ROD	The operator in cooperation with the BLM will conduct an education program to inform employees and visitors about the regulations concerning cultural resource management and artifact collection.
JF2 ROD	BLM will increase law enforcement presence in the area to deter unauthorized collection of cultural materials.
JF2 ROD	The Jonah II Operators will implement the resource protection, mitigation, and monitoring measures found in the Proposed Action, Transportation Plan, Reclamation Plan, and Wildlife Protection/Monitoring Plan. Monitoring inspections conducted by BLM and the Operators will be based upon the parameters identified in these documents.
JF2 ROD	BLM and the Operator's personnel... will conduct monitoring inspections of construction and rehabilitation operations to ensure that the mitigation measures are effective and implemented.
JF2 ROD	Additional opportunities to mitigate residual impacts will be implemented where applicable.

JF2 ROD	The Operators will name a sole point of contact for BLM to deal with in correcting all surface resource concerns and will BLM will name a project manager by June 17, 1998
JF2 ROD	The Operators will conduct monitoring of project sites in cooperation with the BLM.
JF2 ROD	The reclamation monitoring plan shall include written documentation for the effectiveness and success of reclamation mitigation. The Operators will monitor their reclamation to ensure that revegetation meets accepted standards set forth in the Reclamation Plan (Appendix B).
JF2 ROD	Inventory and monitoring of wildlife will be conducted as specified in the Wildlife Monitoring/Protection Plan (Appendix D).

### Overall Recommendations

The PAPA ROD is very complex, confusing and nebulous. With over 190 requirements and commitments in various locations of the document, and in some cases referring to documents that were not created at the time of the ROD, it is very difficult to determine everything that is required. (The author of this document is not sure that 191 requirements are all of them.) The BLM may consider rewriting the ROD. The Jonah Infill ROD was written with 50 requirements and commitments.

Requirements and commitments need to be specific, measurable, attainable and clearly defined.

BLM has required operators and itself to obtain a great deal of data. The objective of obtaining data needs to be clearly defined, so that BLM can determine if the data being collected is meeting the objective, or if the data collection is no longer necessary. Further, BLM, PAWG and Task Groups have noted that while we may be obtaining data, often there is no evaluation, analysis, or compiling of the data. In order for this data to be useful, BLM needs to pursue means (contracting) for data evaluation, analysis, assimilation and distribution.

It is important to note that BLM has issued Orders of the Authorized Officer directing Questar to implement the Appendix A requirements.

**ASU Year Round Drilling DR**

In September 2005 a decision was made for **ASU Year Round Drilling**. The following commitments do not have documentation to prove compliance.

ASU will fully implement the applicant committed measures described in the EA and the ROD for the PAPA EIS, except as modified by this decision, by November 15, 2005.
Maintain currently active big game migration routes.
ASU is sponsoring two wildlife research projects; one of which focuses on impact by natural gas development to pronghorn in the Sublette Herd Unit, and the other is designed to document sage-grouse habitat use of the PAPA and adjacent habitats.