United States Department of Agriculture
Forest Service
Paonia Ranger District
403 North Rio Grande Avenue
P.O. Box 1030
Paonia, CO 81428
970-527-4131
Fax: 970-527-4151

File Code: 2820; 1950
Date: May 25, 2017

Dear Interested Party,

The Bureau of Land Management Uncompahgre Field Office (BLM) and Paonia Ranger District of the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) are seeking public comment on a proposal subsequent to our respective FS/BLM approvals of Surface Use Plans of Operations (SUPO's) and Applications for Permit to Drill (APD's) disclosed in our interagency Dual Operator Proposal Environmental Assessment (EA) in December of 2015 (available at: http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/101197_FSPLT3_2569458.pdf) (DOI-BLM-CO-S050-2015-029-EA). We are contacting you specifically as you have expressed interest in this or subsequent oil and gas activity in the area.

Background

The BLM and PRD have received a Sundry Notice from Gunnison Energy, LLC (GELLC) proposing alternate road construction and reconstruction to access the approved and constructed Spadafora 11-90 20-21-H1/H2 location. While the well has been partially drilled, GELLC has been informed that they do not have permission to use the existing road crossing private land for drilling rig access. The Spadafora 11-90 20-21-H1/ H2 is located at T11S, R90W, Section 20 (see attached map) Gunnison County, Colorado. Existing access to the site is from CO HWY 133, Gunnison County RD 265, National Forest System Road (NFSR) 265, and NFSR 851. About a mile north of the location, there is a locked gate at GMUG/private land boundary. South of this gate, the road is not open to public motorized use. While the location lies on private surface and contains private minerals immediately thereunder, the well will be drilled horizontally, and will access Federal minerals to the east on lease COC-13483.

The proposal includes National Forest System (NFS) and private lands. The Paonia Ranger District is therefore leading the analysis in accordance with the national Environmental Policy Act (NEPA). It is important to note, however, that in accordance with a national BLM/FS Memorandum of Understanding that the decision whether or not to approve the Sundry Notice lies with the BLM.

Purpose and Need

The purpose and need for the project is to provide access to GELLC for the development of the Spadafora 11-90 20-21-H1/H2 wells, and federal lease COC-13483 pursuant to the Mineral Leasing Act of 1920.

Proposed Action (see detailed map)

The proposal entails the following:

- New construction of 1,003 feet of road on NFS lands (0.69 acres initial disturbance, 0.55 acres long-term disturbance)
- Reconstruction of 575 feet of existing road (associated with Federal 11-90-17 access) on NFS lands (0.26 acres initial disturbance, 0.18 acres long-term disturbance)
- New construction of 1,434 feet of road on private lands (0.98 acres initial disturbance, 0.78 acres long-term disturbance)

National Environmental Policy Act Compliance

A preliminary assessment of the proposal suggests this project fits within a category of action that is excluded from NEPA documentation in an EA or Environmental Impact Statement (EIS). I expect this proposal to fit into Energy Policy Act of 2005 (42 U.S.C. 15942), Section 390 category (b) (1) *Individual surface disturbances of less than 5 acres so long as the total surface disturbance on the lease is not greater than 150 acres and site-specific analysis in a document prepared pursuant to NEPA has been previously completed.*

Existing disturbance on lease COC-13483 is limited to 575 feet of existing road referenced above (less than 0.25 acres), and an existing well pad on the 11-90-17 location at the southeastern terminus of the existing road (less than 2 acres). The site-specific analysis in the category is the Dual Operator Proposal EA from December, 2015.

If the project is deemed suitable for the categorical exclusion above, documentation in a Decision Memo would not be required. However, a project record will be compiled, containing:

1. Identification of the applicable category.
2. A brief narrative stating the rationale for making the determination that use of the categorical exclusion applies to the activity under consideration.
3. Any additional information required to demonstrate compliance with all applicable laws, regulations, and policies (e.g., Biological Assessment/Biological Evaluation, cultural/heritage resource clearance, etc.).
4. Copies or reference to materials used to support the determination.

Request for Comments

I am asking for comments on potential issues or concerns I should consider in this proposal. Comments will be accepted until **June 26, 2017**. Comments may be submitted as follows:

Mail:	**FAX:**	**Hand-delivered (8:30-5:00 M-F):**
Paonia Ranger District P.O. Box 1030 Paonia, CO 81428	(970) 527-4151	403 Rio Grande Ave Paonia, CO 81428

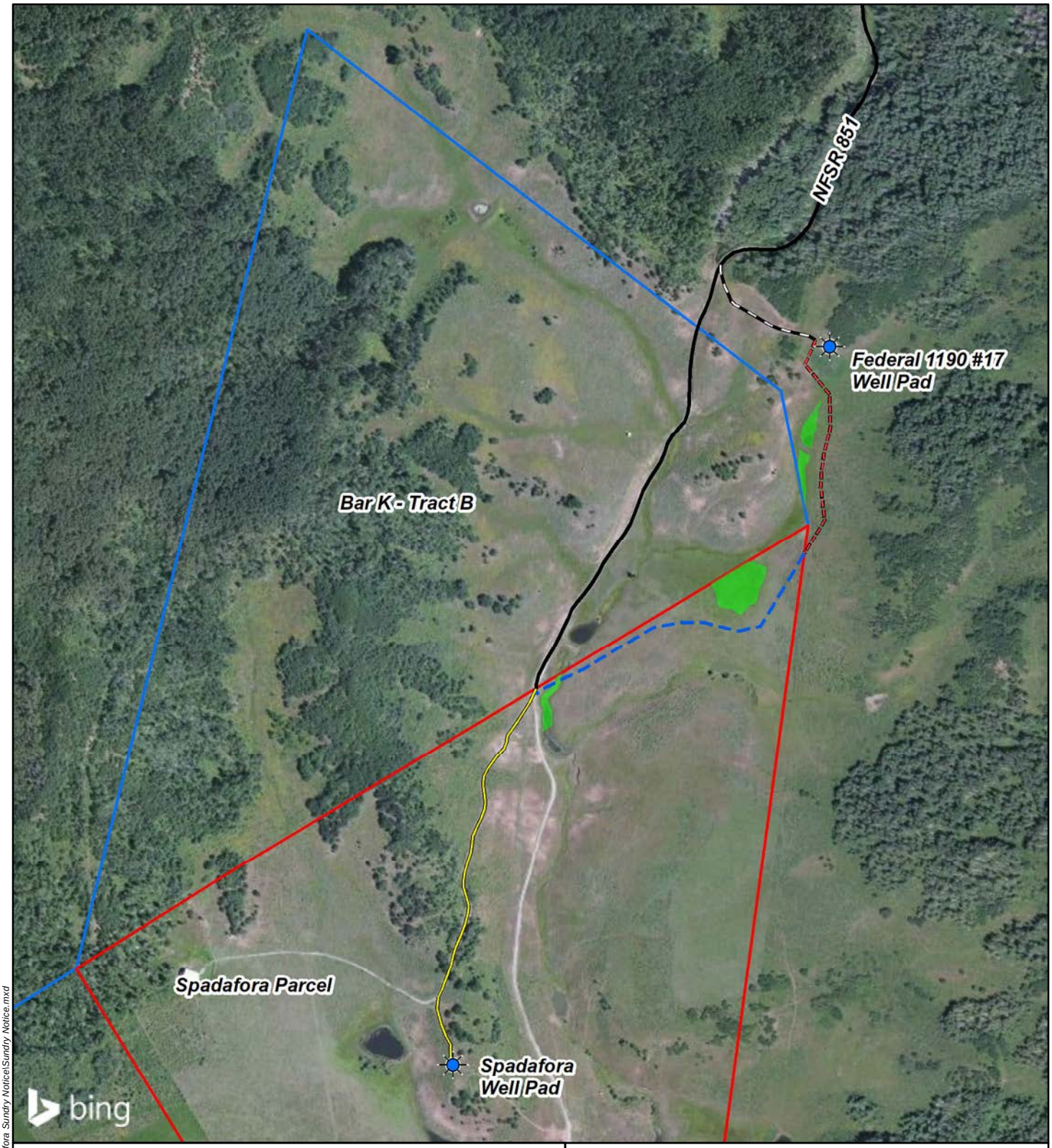
Email: comments-rocky-mountain-gmug@fs.fed.us Email-attachments email may be in common formats, such as .doc, .docx, .pdf, .rtf, .txt, or .html. Please include Spadafora Sundry Notice in the subject line.

Thank you once again for your involvement in the management of the Paonia Ranger District of the GMUG. If you have questions regarding this proposal, please call me at 970-527-4131 or email me at lbroyles@fs.fed.us.

Sincerely,

LEVI BROYLES
District Ranger

Enclosure: Spadafora Sundry Notice Map



Legend

- NFSR 851 - Existing
- Forest Service Access - Proposed (1,003 feet)
- Federal 1190 #17 Access - Needs Reconstruction (575 feet)
- Spadafora Road - Existing
- Private Access - Proposed (1,434 feet)
- Bar K - Tract B Property Boundary
- Spadafora Parcel Boundary
- Wetlands
- Well Pad - Existing

600 300 0 600 Feet

N

Spadafora Well Pad Access Proposal

GUNNISON ENERGY LLC

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