



NEPA Categorical Exclusion Determination Form

Program or Field Office: U.S. Department of Energy (DOE) Office of Legacy Management (LM)

Project Title: Well Abandonment and Site Reclamation at Bronco, Colorado, Site in Rio Blanco County, Colorado

Location: Bronco, Colorado, Site

Proposed Action or Project Description:

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) is proposing to plug and abandon well USBM/AEC CCH#3 and reclaim the site well pad and access road at the Bronco, Colorado, Site in accordance with U.S. Bureau of Land Management (BLM) requirements. The site is in a remote area off of County Road 122 in Rio Blanco County, Colorado, south of Route 64.

The proposed action would include all activities associated with well plugging and abandonment and site reclamation as described in the *Reclamation Plan for Project Bronco Well Abandonment, Rio Blanco County, Colorado*. Well abandonment and site reclamation are within the scope of the Plowshare Program mission to close out any remaining LM liabilities. BLM is the landowner and has jurisdiction over the well plugging and abandonment and site reclamation requirements. The subject well, when installed, did not require permitting and as such is not regulated under the Colorado Oil and Gas Conservation Commission. The well is located within a United States Geologic Survey right-of-way; however, LM has permission to access the site, and no access agreement would be required. Site access would be coordinated with BLM.

The disturbed well pad is a 2.15-acre area with approximately 0.68 acre covered in desirable vegetation as a result of natural succession. The remaining area would be reclaimed with a seed mix approved by BLM. A one-mile-long gravel access road to the site would be reclaimed and revegetated with an approved seed mix following well abandonment activities as requested by BLM. Prior to well abandonment, minor road improvements would be made in off-camber or erosional areas (including two ephemeral drainage crossings) so that project equipment can safely travel to the site. The borehole and associated adjacent "mouse hole" would be plugged and abandoned in accordance with BLM methods. The borehole was drilled to a total depth of 3786 ft below grade with 10 ¾ inch surface casing that rises 4 feet above ground surface.

Stormwater controls and inspections would be completed as required. Monitoring, vegetation management, and stormwater inspections would be conducted until the site reaches final reclamation status as determined by BLM. Two large boulders would be emplaced at each end of the reclaimed site gravel road to limit future unwanted access to the area. Additional activities could include general site visits and surveys to obtain information to support the project, such as vegetation surveys, noxious weed management, and cultural resource surveys. There would be no long-term site maintenance following final site reclamation.

Proposed work is anticipated to occur in the summer of 2020 and would be conducted by a hired subcontractor with LM and Legacy Management Support (LMS) contractor oversight. The LMS contractor would monitor final site stabilization and perform activities associated with the Stormwater Management Plan (monitoring, inspections, corrective actions).

BLM is the lead agency for consultation with the State Historic Preservation Office under the National Historic Preservation Act (NHPA). LM is coordinating with BLM to ensure that NHPA requirements are met. BLM has indicated that no cultural survey is needed for the well pad area since extensive surface disturbance has occurred; however, the borehole needs to be documented since it was installed over 50 years ago. Since the site access road is to be reclaimed, the road and a 50-foot buffer would need a cultural survey.

Proposed activities would not commence until the NHPA process is complete and regulatory requirements and permits identified on the associated Environmental Review Form are met. A rare plant survey was conducted, and the results did not require consultation with U.S. Fish and Wildlife Service; however, concurrence of no affect was requested as a best practice since a threatened plant species was mapped within 300 meters of the work area.



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Categorical Exclusion(s) Applied:

- B1.3 Routine Maintenance
- B3.1 Site Characterization and Environmental Monitoring
- B5.3 Modification or Abandonment of Wells

For the complete DOE National Environmental Policy Act (NEPA) regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of Title 10 *Code of Federal Regulations* Section 1021 (10 CFR 1021).

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

- The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

- There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized by the LM Director per DOE Policy 451.1), I have determined that the proposed action fits within the specified classes of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer Signature and
Determination Date

Tracy A. Ribeiro Digitally signed by Tracy A. Ribeiro
Date: 2020.08.07 13:35:59 -06'00'