

Administrative Determination (AD)
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior - Bureau of Land Management
Anchorage Field Office

A. BLM Office: Anchorage Field Office **Lease/Serial Case File No.:** AKA-028406

Proposed Action Title/Type:

Proposed Gas Storage Facility Drilling in the Swanson River Field

Location of Proposed Action:

Section 27, T. 8 N., R. 9 W., Seward Meridian

Description of the Proposed Action:

UNOCAL has submitted an Application for Permit to Drill a gas storage well in the Swanson River Unit, Lease # AKA-028406. The U.S. Fish and Wildlife Service has surface administration. The new well will be located in Section 27, T. 8 N., R. 9 W., Seward Meridian on the Kenai Peninsula, AK. No new road or well pad construction will occur. Well construction will take place on a preexisting pad. Access to the Kenai Gas Storage Facility #3 (KGSF #3) can be gained by using the existing road infrastructure. An existing gas flow line, which extends from the Swanson River Field Facilities to the subject well, will serve as a conduit. The flow line will bring gas to KGSF #3 to be stored in periods of low demand. It will also produce gas from KGSF #3 during periods of high demand. No additional surface facilities will be required at the well site to initiate gas storage, or to produce stored gas at a later date.

Fresh water required to drill and complete KGSF #3 is available from the adjacent facilities. No new water source will be required. Cuttings from KGSF #3 will be disposed of in the permitted Swanson River Central Drilling Waste Disposal Facility. The facility is currently permitted by Alaska Department of Environmental Conservation to allow for the construction and filling of ten waste cells per year. Typically, one cell per year is filled, with a new one built every few years as a replacement. The cuttings from this well will be placed in the currently open cell, designated Cell #9. Class II liquids associated with the drilling program will be injected into a permitted Class II disposal well at the Swanson River Field. Low viscosity aqueous fluids will be injected with the produced water stream and higher viscosity liquid muds will be injected into a well primarily used for disposal of this type of fluid. Any HAZMAT related wastes (paint, lead-acid batteries, other RCRA wastes, etc.) will be disposed of through a Hazardous Waste coordinator, Philip Services, Inc., and taken to a permitted RCRA Treatment, Storage and Disposal facility.

Ancillary facilities will consist of three small trailers on the drill site for use by the UNOCAL drilling supervisor and the contracted drilling rig tool pusher. The road system and pad associated with the proposed well will not be reclaimed until after all wells on

pad 212-27 have been Plugged and Abandoned (P&A'd). Both the KGSF #3 and Well 212-27 will be producing from the 212-27 pad, so there is a low probability that the wells at that location will be P&A'd anytime soon.

Applicant (if any): UNOCAL Alaska

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans.

The BLM has not developed a land use plan for surface or subsurface oil and gas development in the Kenai Peninsula area. However, this Proposed Action, which occurs within the boundaries of the Kenai National Wildlife Refuge, is subject to the Kenai National Wildlife Refuge Comprehensive Conservation Plan (KNWRCCP). The KNWRCCP was approved by the Secretary of the Interior in January 1985.

The Proposed Action is a continuation of the development and exploration of oil and gas within the identified area. This action (DNA) will occur in the producing Swanson River oil and gas field. The hydrocarbons were discovered in the area in 1957. All leases in this field were issued prior to the National Environmental Policy Act of 1969.

C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.

EA No. AK-984-90-002; Swanson River Unit Gas Field Development for Oil Well SRU 21A-34, June 7, 1990.

D. NEPA Adequacy Criteria

1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?

The Proposed Action is located one section south of the SRU 21A-34 Well. The Proposed Measured and Vertical Depths will be drilled approximately 3,700' and 4,600' above the Measured and Vertical Depths of SRU 21A-34, respectively.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current Proposed Action, given current environmental concerns, interests, and resource values?

The alternatives analyzed in the SRU 21A-34 EA were approve the drilling and registering a "no action" decision regarding the drilling. Since the EA was written, the environmental issues and concerns have not changed.

3. Is the existing analysis valid in light of any new information or circumstances?

The following Critical Elements have been analyzed and will not be affected:
Air Quality

Areas of Critical Environmental Concern
Environmental Justice
Farm Lands (Prime or Unique)
Floodplains
Native American Religious Concerns
Wastes (Hazardous or Solid)
Water Quality (Drinking or Ground)
Wetlands/Riparian Zones
Wild and Scenic Rivers
Wilderness

Cultural Resources; Invasive, Non-Native Species; T&E Species; and Subsistence have all been analyzed and will not be affected. Compliance and Determination reports have been prepared for these resources and are located in Case File AKA-028406.

4. **Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current Proposed Action?**
Yes.

5. **Are the direct and indirect impacts of the current Proposed Action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current Proposed Action?**
The direct and indirect impacts identified in the SRU 21A-34 EA are the same as would be anticipated for the Proposed Action. The SRU 21A-34 EA provides a reasonable basis for making a decision on the Proposed Action.

6. **Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?**
Yes, they are identical.

7. **Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?**
The proposal for which the SRU 21A-34 EA was written was posted for 30 days and received no comments. The current proposal has also been posted for 30 days with no comments received.

- E. **Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.**
See the attached NEPA routing sheet and specialists' worksheets.

F. Mitigation Measures:

There are no mitigation measures.

G. Conclusion:

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 NEPA.

/s/ June Bailey, Acting
Anchorage Field Manager

05-12-03
Date