

Master Development Plans (MDPs) / Geographic Area Plans (GAPS)

COMPREHENSIVE PLANNING TOOLS FOR OIL AND GAS PROJECTS

**BUREAU OF LAND MANAGEMENT
GLENWOOD SPRINGS FIELD OFFICE – PILOT PROGRAM
ENERGY OFFICE**

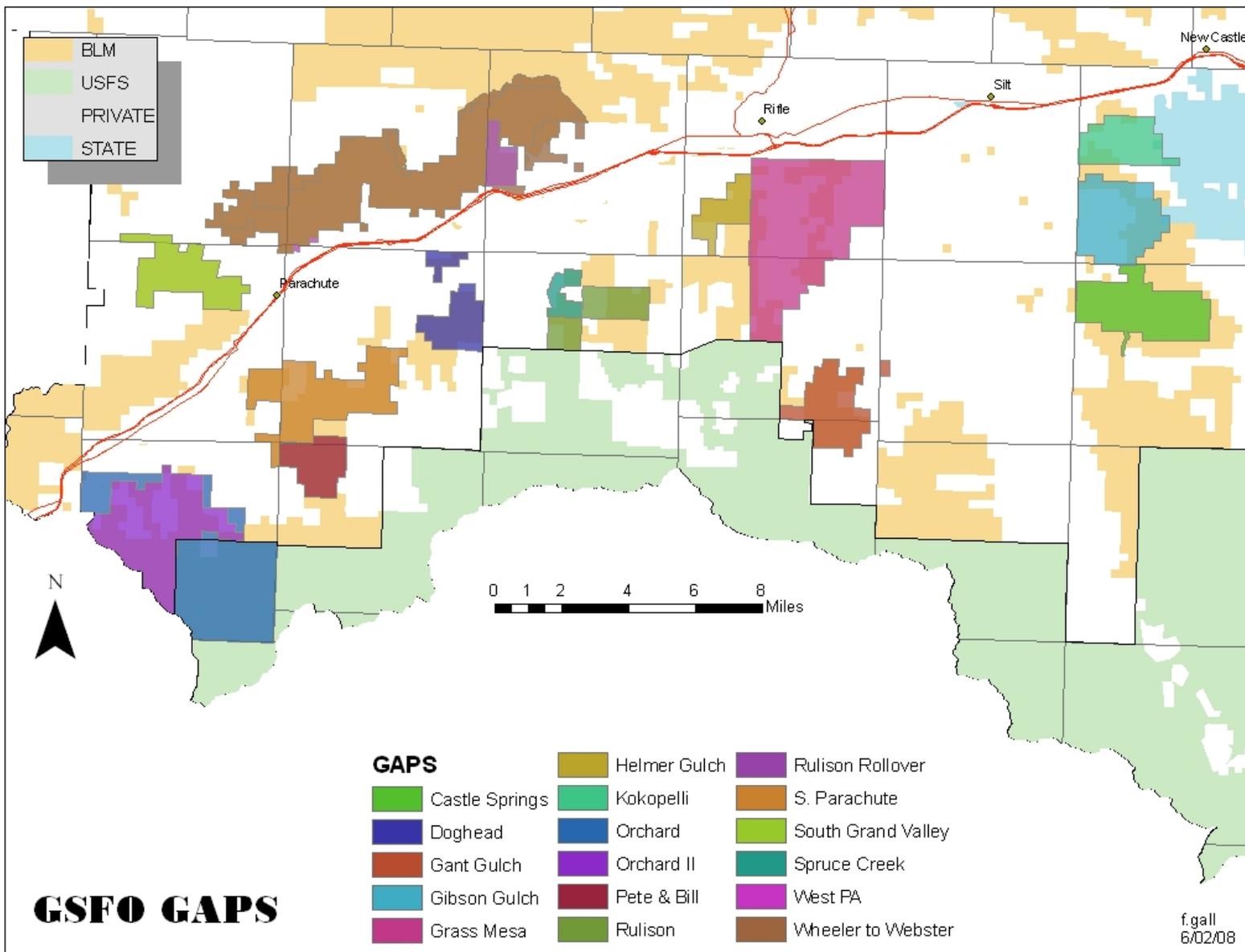
Allen B. Crockett, Ph.D., J.D.
Supervisory Natural Resource Specialist/Physical Scientist
allen_crockett@blm.gov, 970-947-5234

Pilot Program Energy Office

- One of Seven Pilot Program Offices in Western U.S.
- Created by Energy Policy Act of 2005 to:
 - Streamline Permitting
 - Improve Inspections and Enforcement
 - Include USFS, USFWS, and USACE
- My Role – Supervise Permitting and NEPA Compliance
- Fred Conrath – Supervises Inspections & Enforcement
- Jamie Connell (Field Mgr.), Steve Bennett (Assoc. F.M.)

What is an MPD (formerly a GAP)?

- Concept used by some BLM Offices to Plan and Manage Large-scale Oil and Gas Projects
- Submitted by a Single Operator for a Specific Area
- One or Multiple Leases
- 2- to 5-Year Development Horizon
- Provides for “Environmental Assessment” under NEPA



What is the Process?

1. Operator Meets with BLM to Describe Project at Conceptual Level

- General Type, Number, and Location of Components (Project Maps, GIS Data)
- General Timeline (Desired Start, Anticipated Duration of Drilling, etc.)
- Introduce Project Team – Operator and BLM Staffs, Contractors, etc.

2. BLM Team Looks at Existing Resource Layers (GIS Coverage)

- Wildlife and Vegetation, including Threatened, Endangered, or BLM Sensitive Species
- Surface Water and Wetland/Riparian Areas
- Cultural (Archaeological) Resources
- Fossil Resources
- Geology and Groundwater
- Visual Resources

3. BLM Team Looks at Existing Management Layers

- Lease Stipulations
 - *No Surface Occupancy*
 - *Controlled Surface Use*
 - *Timing Limitations*
- Management Designations (e.g., Visual Resource Management Classes, ACECs, WSRs, etc.)

4. BLM, Operator, Contractors, and Other Agencies Conduct an “Onsite”

- Become Familiar with Site-Specific Conditions and Proposed Locations – Staked in the Field
- Discuss General and Site-Specific Issues and Concerns
- Look for Ways to Avoid, Minimize, or Mitigate Impacts
- Give Operator Options for Revising Project before Formal Public Notice

5. Operator Submits NEPA Proposed Action

- Posted on BLM Website for Public Scoping
- Includes Mitigation Measures and Best Management Practices
- Used by BLM or Third-Party Contractor for Impact Analysis and Development of Mitigation

6. Operator Submits Resource Survey Reports (prepared by contractors) – May submit earlier in process

7. BLM Prepares NEPA Documents (EA and FONSI)

- Addresses Proposed Action and No Action Alternative
- May Exclude (Deny or Defer) Some Components
- Includes Responses to Public Comments
- Discloses Impacts, including Cumulative Impacts
- Lists General and Site-Specific COAs Required for Subsequent Approvals (e.g., Drilling Permits)

What are the Advantages of the MDP Process?

Comprehensive – Not Piecemeal

- Well Pads, Production Facilities, Access Roads, Pipelines
- Existing and New Facilities
- Federal, Split-Estate, and Fee Wells
- Surface Locations and Bottomhole Targets

Better for Planning Resource Surveys and Designing Mitigation Plans

- Avoids Redundant Efforts with Piecemeal Projects
- Cost Effective for Operator (Economy of Scale)
- Provides Information Early in Process
- Typically Includes “Block Clearances”
- Allows BLM, CDOW, etc. to Take Broader Look at Impacts and Mitigation

Allows Changes While Plans Still Flexible

- Eliminate or Defer Problematic Pads
- Shift Pad Locations to Avoid or Minimize Impact
- Reconfigure Pad Size and Shape
- Modify Pad Layout – Location of Wells, Pits, Separators, Tanks, etc.
- Minimize New Roads, Cross-Country Pipelines

More Efficient for Operators and BLM

- Informs Operator Well in Advance of Problems and Allows Time to Find Solutions
- Allows BLM to Prepare One Instead of Multiple NEPA Documents
- Provides Basis for Use of “Statutory Categorical Exclusions” to Authorize Followup Activities

Better for Informing Public of Proposed Oil and Gas Developments

- Provides Notification Farther in Advance than with Piecemeal EAs having Shorter Timeframes
- Allows Public to Comment on a Single Proposal Instead of Tracking Numerous Smaller Proposals

Are There Disadvantages?

- ***Problem:*** Large, complex projects can become “bogged down” due to one or a few problematic components.

Response: BLM can approve specific components separately or approve the overall MDP while deferring specific components pending additional information.

- ***Problem:*** Multiple leases may have differing stipulations (e.g., big game TL durations).

Response: BLM can work with the operator and CDOW to set consistent TLs with additional mitigation.

Are MDPs Ever Not Appropriate?

- Individual or Small Groups of Exploratory Wells
- Individual Pads along Existing Roads
- New Wells on Existing Locations

Bottom Line

Master Development Plans are good for BLM, other agencies, the operators, and the public by establishing a comprehensive planning tool for oil and gas projects on Federal surface or mineral estate lands.