

University of Colorado Law School

Colorado Law Scholarly Commons

Best Management Practices (BMPs): What?
How? And Why? (May 26)

2011

5-26-2011

SLIDES: Master Development Plans (MDPs) / Geographic Area Plans (GAPS): Comprehensive Planning Tools for Oil and Gas Projects

Allen B. Crockett

Follow this and additional works at: <https://scholar.law.colorado.edu/best-management-practices-bmps>



Part of the [Administrative Law Commons](#), [Animal Law Commons](#), [Climate Commons](#), [Energy and Utilities Law Commons](#), [Energy Policy Commons](#), [Environmental Health and Protection Commons](#), [Environmental Law Commons](#), [Environmental Monitoring Commons](#), [Environmental Policy Commons](#), [Natural Resource Economics Commons](#), [Natural Resources and Conservation Commons](#), [Natural Resources Law Commons](#), [Natural Resources Management and Policy Commons](#), [Oil, Gas, and Energy Commons](#), [Oil, Gas, and Mineral Law Commons](#), [Science and Technology Law Commons](#), [State and Local Government Law Commons](#), [Urban Studies and Planning Commons](#), [Water Law Commons](#), and the [Water Resource Management Commons](#)

Citation Information

Crockett, Allen B., "SLIDES: Master Development Plans (MDPs) / Geographic Area Plans (GAPS): Comprehensive Planning Tools for Oil and Gas Projects" (2011). *Best Management Practices (BMPs): What? How? And Why? (May 26)*.
<https://scholar.law.colorado.edu/best-management-practices-bmps/6>

Reproduced with permission of the Getches-Wilkinson Center for Natural Resources, Energy, and the Environment (formerly the Natural Resources Law Center) at the University of Colorado Law School.

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

COMPREHENSIVE PLANNING TOOLS FOR OIL AND GAS PROJECTS

**BUREAU OF LAND MANAGEMENT
COLORADO RIVER VALLEY FIELD OFFICE (CRVFO)
SILT, COLORADO**

Allen B. Crockett, Ph.D., J.D.
Supervisory Natural Resource Specialist/Physical Scientist
acrocket@blm.gov, 970-876-9005

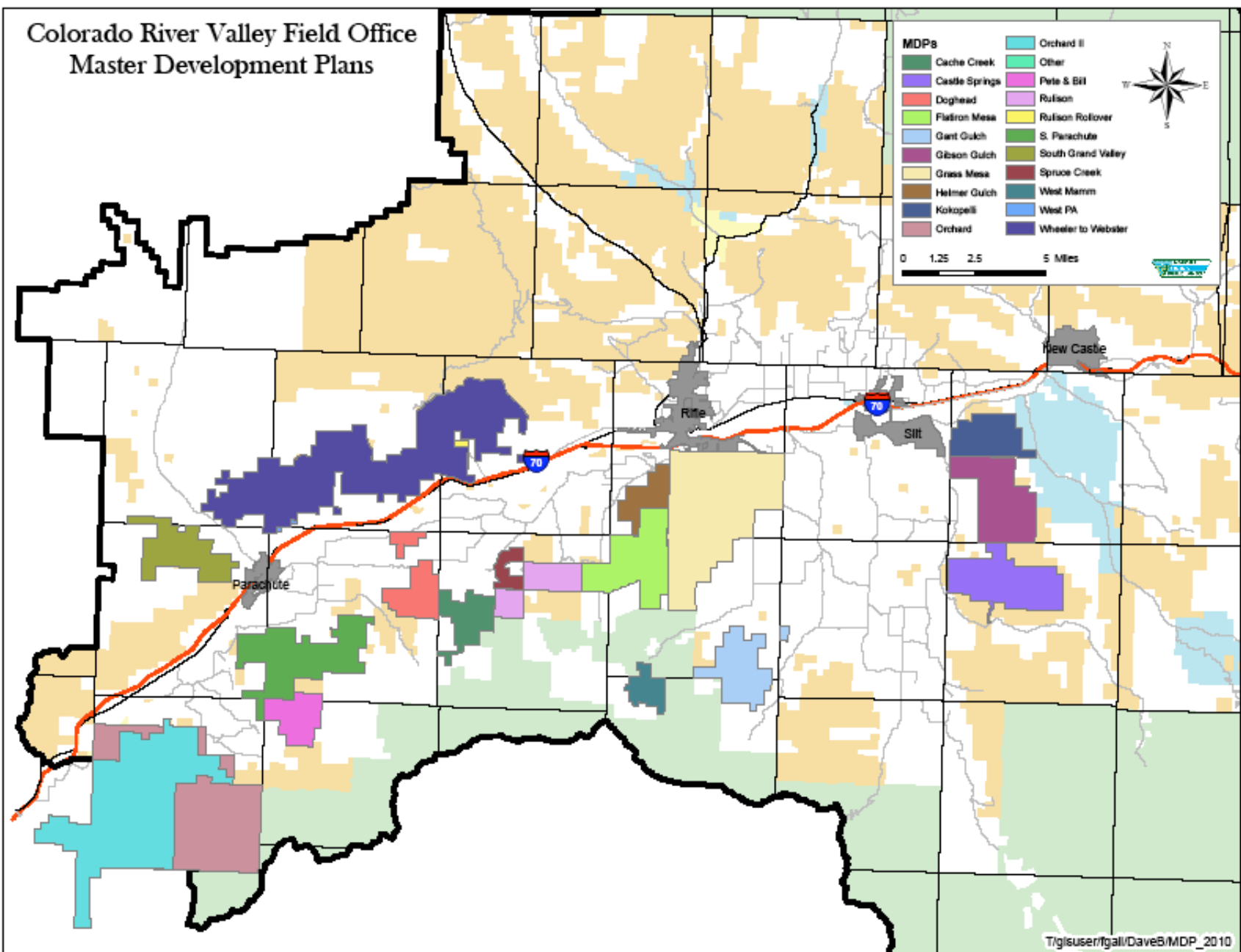
Pilot Program Energy Office

- 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 on Interdisciplinary Team
- My Role – Supervise Permitting and NEPA Compliance
- Steve Ficklin – Supervises Inspections & Enforcement
- Steve Bennett (Field Mgr.), Karl Mendonca (Assoc. F.M.)

What is an MPD (formerly a GAP)?

- Used by BLM to Plan and Manage Large-scale Oil and Gas Projects, Codified at 43 CFR 3160, Onshore Order No. 1
- Submitted by a Single Operator for a Specific Area (could be used with Multiple Operators, but problems of competing interests, proprietary information)
- One or Multiple Leases
- 2- to 5-Year Development Horizon
- Provides for “Environmental Assessment” under NEPA

Colorado River Valley Field Office Master Development Plans



MDPs	
Cache Creek	Orchard II
Castle Springs	Other
Doghead	Pete & Bill
Flatiron Mesa	Rulison
Gart Gulch	Rulison Rollover
Gibson Gulch	S. Panachute
Gress Mesa	South Grand Valley
Helmer Gulch	Spruce Creek
Kokopelli	West Mamm
Orchard	West PA
	Wheeler to Webster

0 1.25 2.5 5 Miles

At What Point are MDPs Appropriate to Initiate?

- Two options, both mentioned in Onshore Order #1:
 - **Early initiation (NOS stage)**
 - Less detailed information available for project
 - Requires more iterations by BLM personnel
 - Operator more flexible to make changes
 - **Detailed plan (APD stage)**
 - More precise information, including bottomhole targets
 - More efficient for BLM, shorter timeframe
 - Operator more resistant to changes

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
- Geology and Groundwater
- Cultural (Archaeological) and Fossil Resources
- Visual Resources, Recreation, etc.
- Air Analysis tied to BLM Regional Model

3. BLM Team Looks at Existing Management Layers

- Lease Stipulations
 - *No Surface Occupancy*
 - *Controlled Surface Use*
 - *Timing Limitations*
- Special Management Designations (Areas of Critical Environmental Concern, Wilderness Study Areas, Wild and Scenic Rivers, etc.)

4. BLM, Operator, Contractors, and Other Agencies Conduct Joint Site Visits

- 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 Prepares Proposed Action

- After Review / Acceptance by BLM, Posted on BLM Website for Public Scoping
- Incorporates Project Design and Proposed Mitigation or Best Management Practices
- Used by BLM or BLM-Approved Contractor for Draft of Impact Analysis and Mitigation Plan

6. Operator Submits Resource Surveys

- Raptors, Cultural, Rare Plants, Wetlands, etc.)

7. BLM Prepares NEPA Document (EA and Finding of No Significant Impact)

- Addresses Proposed Action, No Action Alternative, and Sometimes Other Alternatives
- May Exclude (Deny or Defer) Some Components
- Includes Responses to Public Comments
- Discloses Impacts, including Cumulative Impacts
- Lists General and Site-Specific Conditions of Approval (COAs) to Mitigate Impacts

What are the Advantages of the MDP Process?

Comprehensive

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

Better for Planning Resource Surveys and Designing Mitigation Plans

- Avoids Redundant Efforts for Multiple Well Pads
- Cost Effective for Operator (Economy of Scale)
- Provides Information Early in Process
- Typically Includes “Block Clearance” Surveys for Resources to Changes in Design
- Allows BLM and Other Agencies to Take a Broader Look at Impacts and Mitigation

Allows Changes Before MDP Completed

- Eliminate or Defer Problematic Well Pads
- Shift Pad Locations to Avoid or Minimize Impact
- Reconfigure Pad Size and Shape
- Modify Pad Layout – Location of Wells, Pits, Separators, Tanks, etc., to Minimize Impacts and Improve Interim Reclamation
- Ensure that Project Uses Existing Roads and Existing Pipeline Corridors to Extent Practicable – e.g., Sharing use with Other Operators

More Efficient for Operators and BLM

- Informs Operator Well in Advance of Problems and Allows Time to Find Solutions
- Operator Generally Less “Locked In” Because Less Time and Cost Spent on Detailed Design
- Allows BLM to Prepare One Instead of Multiple NEPA Documents
- Provides Basis for Use of “Statutory Categorical Exclusions (CXs)” 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

Section 390 CXs

Five Categories Available

- Individual disturbance <5 acres, <150 acres total on lease, previous site-specific NEPA
- New well on existing pad <5 years after a previous well
- New well in established field when analyzed in previous NEPA as reasonably foreseeable future action
- New pipeline in existing right-of-way corridor within 5 years of previous disturbance
- Maintenance of a minor facility (no new construction)

Some Problems and Solutions

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

Solution: 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., 5-month big game winter range Timing Limitation [TL] on newer leases, no or shorter TL on older leases).

Solution: BLM can work with the operator and CDOW to apply consistent TL dates with additional mitigation.

- **Problem:** Long-term projects (>5 years) may change significantly due to advances in technology, new geologic information, different economics
- **Solution:** Have the operator split project into phases
 - Not “piecemealing” under NEPA because later phase is “too speculative” for adequate analysis
 - MDP for first phase should disclose future phase in concept (likely scale, location, timing)

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 Federal mineral estate lands.