

**Procedures to Address Threatened and Endangered Species and Historic Properties for the Federal Implementation Plan for True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector**

**Section 1: Contact Information**

Business name: BP America Production Company	Site address: Phillips Gas Unit A2 (37.13588386 N, -107.8250192 W), Phillips Gas Unit A4, and Zellitti Gas Unit A4 Well Pad (NE ¼, NE ¼, S33, T34N, R9W)
Send all correspondence regarding this evaluation to (mailing address): 380 Airport Road Durango, CO 81303	Contact for this notification: Name: Phone: Email:  Julie Best, (970)-375-7540, julie.best@bp.com

**Section 2: Evaluation of Threatened and Endangered Species and Historic Properties**

**1. Threatened or Endangered Species**

Please indicate under which criterion in Appendix A you satisfy after evaluating the effects on threatened or endangered species as a result of your construction, modification or operation of your new or modified minor source of air pollutants. Be sure to include all documentation identified in Appendix A with this evaluation.

A     B     C     D     E

**2. Historic Properties**

Please indicate under which criterion in Appendix B you satisfy after evaluating the effects to historic properties as a result of your construction, modification or operation of your new or modified minor source of air pollutants? Be sure to include all documentation identified in Appendix B with this evaluation.

No historic properties affected     No adverse effects     Adverse effects

**Section 3: Signature**

Name: <u>Rebecca Robert</u> (Signature)	Name: <u>Rebecca Robert</u> (Print or Type)
Title: <u>Air Specialist</u>	Date: <u>11/14/2016</u>

**SCREENING EVALUATION TO ADDRESS THREATENED AND ENDANGERED SPECIES AND  
HISTORIC PROPERTIES FOR THE FEDERAL IMPLEMENTATION PLAN FOR TRUE MINOR SOURCES  
IN INDIAN COUNTRY IN THE OIL AND NATURAL GAS PRODUCTION AND NATURAL GAS  
PROCESSING SEGMENTS OF THE OIL AND NATURAL GAS SECTOR**

**BP AMERICA PRODUCTION COMPANY  
PHILLIPS GAS UNIT A2, PHILLIPS GAS UNIT A4, AND ZELLITTI GAS UNIT A4 WELL PAD**

**Overview**

BP America Production Company (BP) is submitting this screening evaluation in accordance with the United States Environmental Protection Agency's *Procedures to Address Threatened and Endangered Species and Historic Properties for the Federal Implementation Plan for True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector* (screening procedures) and 40 CFR 49.104(a)(2). This screening evaluation addresses the proposed minor modification at the Phillips Gas Unit A2, Phillips Gas Unit A4, and Zellitti Gas Unit A4 well pad, an existing true minor source under 40 CFR Part 49, Federal Minor New Source Review Program in Indian Country. The emission source currently proposed to be constructed at the well pad is a natural gas fired compressor engine. Other potential emission sources at the site may include, but are not limited to, additional natural gas fired engines, tri-ethylene glycol dehydrators, natural gas fired glycol reboilers, natural gas fired heaters, storage tanks, and fugitive components. Potential emissions from the modification of equipment at the site are anticipated to be less than the major source thresholds in 40 CFR 52.21 but equal to or greater than the thresholds for the minor New Source Review program (40 CFR Part 49, Subpart C).

These wellsites produce natural gas. Since these are coal bed methane wells, the well streams are routed through a fired separator to separate natural gas and produced water. These wellsites will utilize wellhead compression to move gas to a centralized facility for compression or processing. In the future, the wellsites may utilize artificial lift to optimize production. The compressed gas may be sent through a tri-ethylene glycol dehydrator unit to remove entrained water prior to routing to a centralized facility.

BP evaluated the effects on threatened and endangered species and on historic properties as a result of the proposed modification at the Phillips Gas Unit A2, Phillips Gas Unit A4, and Zellitti Gas Unit A4 well pad (proposed modification). This submittal demonstrates the proposed modification meets the applicable Criterion A of the screening procedures with respect to the protection of any and all species that are federally-listed as threatened or endangered under the Endangered Species Act (ESA) or of habitat that is federally-designated as "critical habitat" under the ESA and supports no historic properties will be affected. Therefore, upon approval, the proposed modification qualifies for the Federal Implementation Plan (FIP) for True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector (40 CFR 49.101 – 49.105).

**Appendix A – Threatened or Endangered Species Requirements**

Action Area

The well pad for the Phillips Gas Unit A2, Phillips Gas Unit A4, and Zellitti Gas Unit A4 wells is located at an elevation of 6722 feet in NE ¼, NE ¼, Section 33, Township 34N, Range 9W near the city of Ignacio in La Plata County, Colorado on fee land within the

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exterior boundaries of the Southern Ute Indian Reservation. The currently proposed compressor engine will be located about fifteen (15) feet to the northwest side of the production separator building on the pad. The attached aerial photograph depicts the proposed location in red. BP selected the existing facility footprint as the action area. The proposed modification will be constructed within the existing facility footprint in a previously disturbed area and does not require additional infrastructure (road, power line, and pipeline). BP will utilize Best Management Practices before and after the proposed modification for storm water design and noise mitigation to minimize offsite impacts. Lighting effects during construction, maintenance, and operation of the proposed modification will be minimal as there will be no artificial lighting used at the facility during the day or night. In accordance with 40 CFR 49.105, BP will comply with the applicable National Emission Standards for Hazardous Air Pollutants and New Source Performance Standards requirements for the affected sources at the site. The area is currently considered in attainment for the National Ambient Air Quality Standards pollutants. The proposed modification will not constitute a major new source as defined under Prevention of Significant Deterioration (40 CFR 52.21) since the potential to emit of each regulated new source review pollutant that is not a greenhouse gas will be less than 250 tons per year. The site will remain a true minor source.

Endangered and Threatened Species and Critical Habitats

Since the proposed modification will occur within the existing facility footprint in a previously disturbed area, and the construction of the source does not require additional infrastructure, BP concludes that there is no potential to cause effects on federally-listed or endangered species or designated critical habitat(s) of such species as a result of the modification. No further screening steps are necessary.

**Appendix B – Historic Property Screening Process**

Since the proposed modification will occur within the existing facility footprint in a previously disturbed area, and the construction of the source does not require additional infrastructure, BP concludes that no historic properties will be affected as a result of the modification. No further screening steps are necessary.

Zellitti A2 & Phillips A2/A4

