



United States Department of Interior  
Bureau of Land Management  
Farmington Field Office  
1235 La Plata Highway  
Farmington, New Mexico

RECEIVED OGD

2011 APR 29 P 12:38

RE: Williams Production Company, LLC  
Middle Mesa Plan of Development  
Bureau of Land Management, Farmington Field Office

Dear Interested Party,

The purpose of this letter is to inform and solicit responses from interested and affected parties that the Bureau of Land Management (BLM) Farmington Field Office (FFO) has received a request from Williams Production Company, LLC (Williams) for an exception to the seasonal closure period in the Middle Mesa Wildlife Area Specially Designated area (SDA). The proposed action would be located on BLM/FFO administered lands and would access the federal mineral estate. As such, the proposed project is subject to compliance with the National Environmental Policy Act (NEPA). The BLM/FFO is the agency designated to supervise preparation of the environmental analysis.

The purpose and need for the proposed action is to administer the federal mineral leasing laws, regulations, direction, and policies and support sound energy exploration and development, while minimizing surface resource impacts. The proposed project would be consistent with the terms and the conditions of the Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS) which was approved as the Final Resource Management Plan for the Bureau of Land Management Farmington Field Office by the Record of Decision (ROD) signed September 29, 2003.

Williams is requesting that the BLM/FFO analyze through the NEPA Process a limited modification to the seasonal closure Condition of Approval for the Middle Mesa portion of the Williams Rosa Unit. The modification would entail permitting year-round drilling from only one pad each winter within the Middle Mesa Wildlife Area SDA. In compliance with the 1920 Minerals Leasing Act, the decision to be made is **not** to determine whether or not to allow drilling, but rather, in what manner it should occur.

The Condition of Approval in the SDA imposes a seasonal restriction on drilling from December 1 to March 31 each year. Williams' federal leasehold is wholly contained within the winter closure area. Historically, Williams has moved their contract drilling rigs onto the Jicarilla Apache Reservation or southwest Colorado during winter months. However, recent commercial developments and lack of undrilled locations has limited the drilling activity in these areas.

If Williams continues to develop Middle Mesa as currently allowed under the Farmington Resource Management Plan, it is projected that more than 570 new vertical wells might be required to access the available natural gas on Middle Mesa. This could result in an estimated 1,040 acres of new surface disturbance resulting in a long-term occupancy/activity period of at least 43 years and increased habitat fragmentation..

Williams is proposing the phased development of eight well pads which would be twinned or co-located with existing vertical well locations within the Middle Mesa Wildlife Area SDA. Thirteen wells would be drilled on each pad location; eight in the Mancos shale, two in the Fruitland, and three in the Mesa Verde.

A total of approximately 56 horizontal wellbores would be drilled from these eight pads to the Mancos Shale. Up to 30 additional directional wells would be drilled for development of non-Mancos reservoirs. Only one pad would be used for drilling operations between December 1 and March 31 annually. Drilling activities are expected to be completed in approximately four to seven years, depending upon whether the rig remains resident in Middle Mesa or is moved to East Rosa for summer drilling. Applications for Permits to Drill would be prepared as specified by the BLM for the drilling program.

Drilling activities on a single site would begin each year in October and are projected to last 12 months on each well pad before wells would enter the production phase and reclamation would occur. Williams would commence the proposed drilling in the winter of 2012. The proposed action would be located in Sections 4, 9, 16, and 17 of Township 31 North, Range 6 West, and in Section 33 of Township 32 North, Range 6 West, New Mexico Principal Meridian. Each well pad would be approximately 500 by 300 feet in dimension for a total of 3.4 acres in size and would be twinned or co-located with existing well pads, thus minimizing new surface disturbance.

Post drilling well stimulation would occur outside of the winter closure period. Well stimulation equipment would be located off site. For the proposed drilling program, two well stimulation pads would be constructed outside the winter closure period. Each pad would be approximately 350 by 500 for a total disturbance of 4.0 acres. An approximate 2.0 acre produced water holding pond would be located on each well stimulation pad. To minimize disturbance, the centralized holding ponds would be built and shared by the eight drilling locations so that an individual holding pond is not required on every pad. Stimulation activities would be conducted adjacent to the holding ponds and pumped to the individual wells via a 4-1/2" P-110 above-ground welded steel pipeline. Flowback water would be transferred by pipeline back to the holding ponds for reuse in subsequent stimulations. All above ground stimulation lines would be installed in existing disturbances/rights of way.

Approximately 10 employees would be working on the site during drilling. Vehicle trips per day to and from the drilling location would be limited by Williams' proposal to create a "residential camp". The residential camp would be located on private land. At the change of shifts, workers would be transported to and from the camp by high-capacity vehicles such as a bus or large van. During the winter restriction period, Williams will also agree to require those occupying the residential camp during non-work hours to restrict their excursions outside of the man camp boundaries. Additional mitigation measures would be implemented to minimize vehicle traffic.

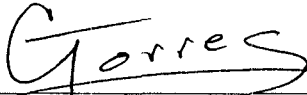
The environmental analysis for this proposed action will address: protection of threatened/endangered species and their habitats, water quality, effects to BLM/SDAs, and disturbances to wildlife, and other resources.

Issues identified that are outside the scope of this proposal will not be addressed at this level of planning. The comment period ends 30 days following the date of publication of the legal notice in the *The Daily Times*. Expected publication date of the press release is April 27, 2011. The publication date is the exclusive means for calculating the time to submit comments on the proposed action. Those wishing to comment on the proposal should not rely upon dates or timeframes provided by any other source. Comments received in response to this solicitation, including your name and address, will be part of the public record and available for public inspection. The purpose of this comment period is to allow the public early and meaningful participation on the proposed action prior to a decision being made by the Responsible Official(s).

Comments to the Bureau of Land Management may be submitted by: (1) by regular mail to Maureen Joe, Project Lead, at 1235 La Plata Hwy, Farmington NM, 87401; (2) facsimile at FAX number (505) 599-8999; (3) e-mail in word (.doc), rich text format (.rtf), text (.txt), Adobe Acrobat (.pdf), or hypertext markup language (html) to [mjoe@nm.blm.gov](mailto:mjoe@nm.blm.gov); or, (4) may be hand delivered Monday through Friday 7:45 am – 4:30 pm at Farmington Field Office 1235 La Plata Highway, Farmington, New Mexico 87401 . To be eligible for appeal, each individual or representative from each organization submitting comments must either sign the comments or verify identity upon request.

If you have any concerns or questions about the proposed project, please do not hesitate to contact the Bureau of Land Management Project Lead, Maureen Joe, at the Farmington Field Office, 1235 La Plata Highway, Farmington, NM 87401, 505-599-8900, 505-599-8999 (fax).

Sincerely,



Gary Torres, Field Manager  
Bureau of Land Management  
Farmington Field Office

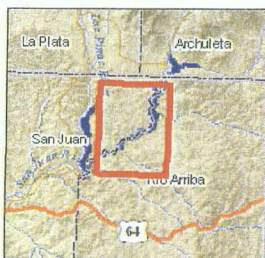
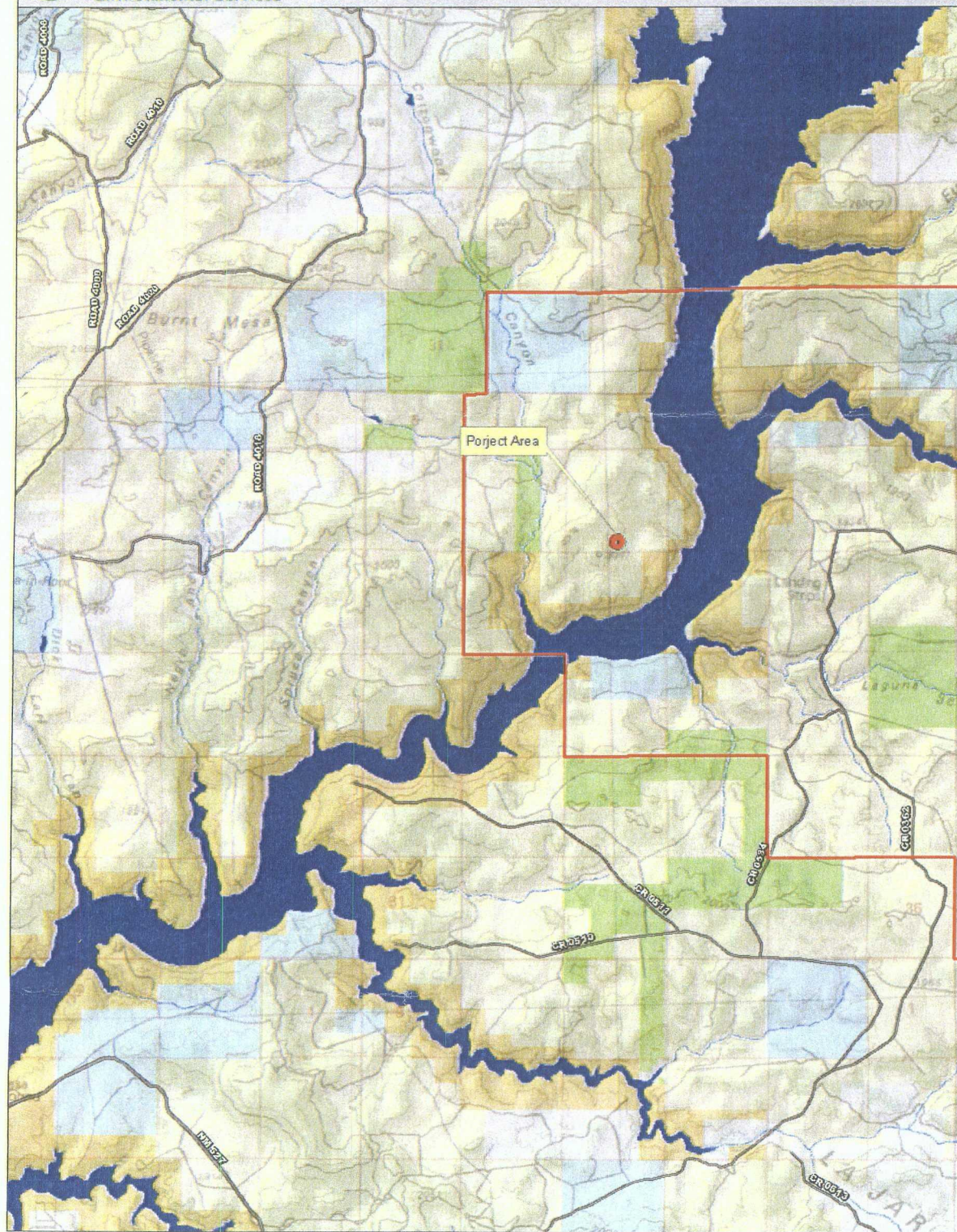
Date 4/26/2011

Enclosures: Maps



**Ecosphere**  
Environmental Services

**Williams Production Company**



Major Roads_2004 Surface Ownership	
CLASS	Owner
OTHER ROADS	Private
COUNTY RD	State
STATE HWY	State Wildlife Area
US HWY	Rosa Unit
	Bureau of Land Management
	Bureau of Reclamation
	US Forest Service
	US Fish and Wildlife Service
	Tribal

0 700 1,400 2,800  
Meters



## MIDDLE MESA PLAN OF DEVELOPMENT

FIGURE 1 - VICINITY MAP

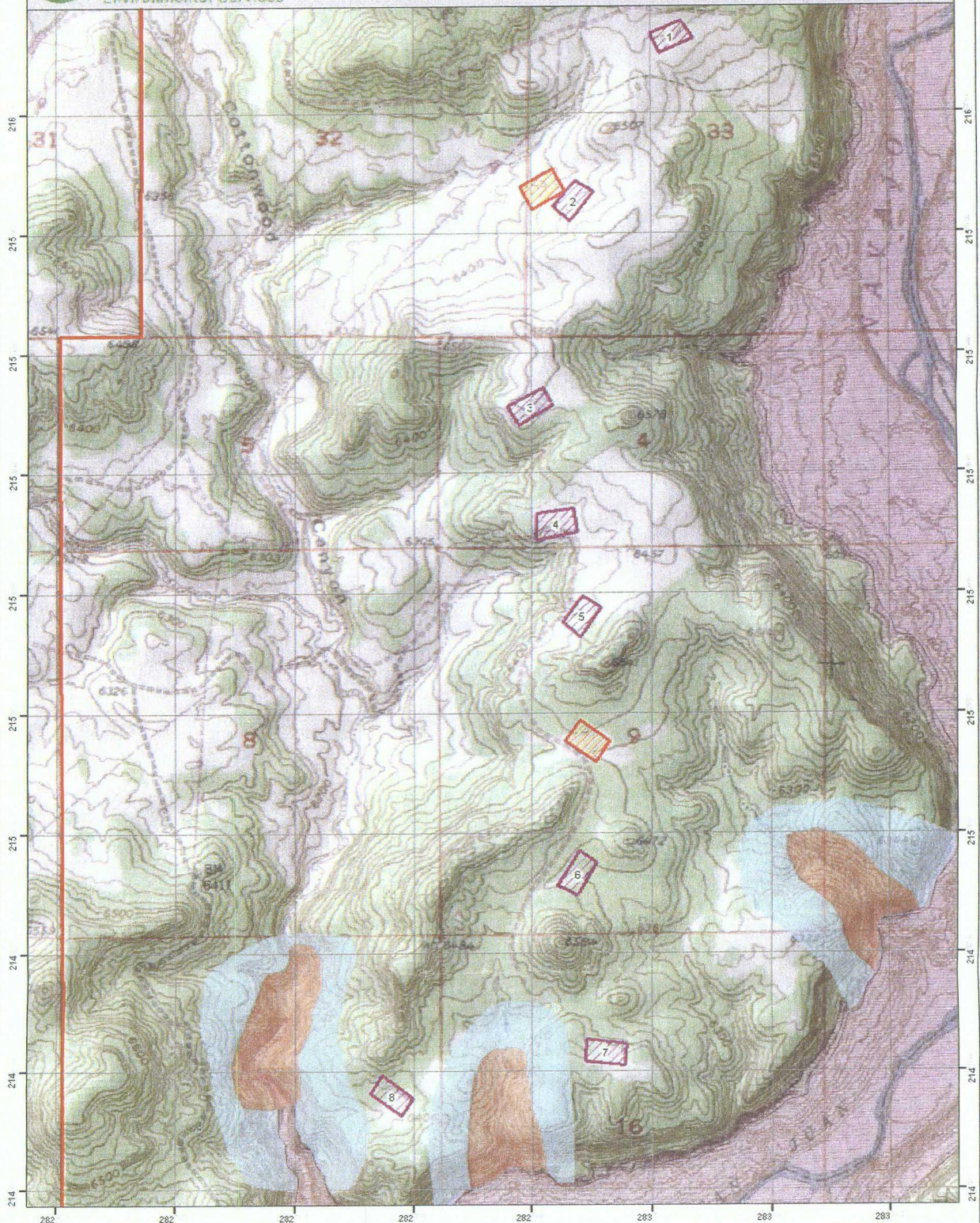
SAN JUAN COUNTY, NEW MEXICO

T32N, R6W SECTION 33

T31N, R6W, SECTIONS 4, 9, 16, AND 17

BANCOS MESA NW, NM 7.5 MIN. QUADRANGLE

4/7/2011



**MIDDLE MESA PLAN OF DEVELOPMENT**

FIGURE 2 - PROJECT AREA MAP

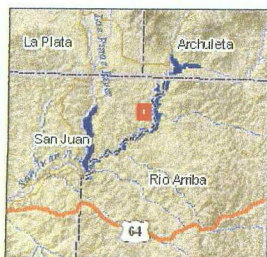
SAN JUAN COUNTY, NEW MEXICO

T32N, R6W SECTION 33

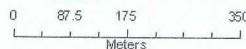
T31N, R6W, SECTIONS 4, 9, 16 AND 17

BANCOS MESA NW, NM 7.5 MIN. QUADRANGLE

4/7/2011



- Specially Designated Areas**
- ACEC/Bald Eagle
  - ACEC/Bald Eagle Core Site
  - Wildlife Area/BG
  - Proposed Well Pads
  - Stimulation Pads



**MIDDLE MESA PLAN OF DEVELOPMENT**

FIGURE 3 - AERIAL MAP  
SAN JUAN COUNTY, NEW MEXICO  
T32N, R6W SECTION 33  
T31N, R6W, SECTIONS 4, 9, 16, AND 17

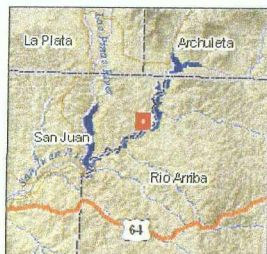
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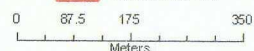
**Ecosphere**  
Environmental Services

**Williams Production Company**



**Specially Designated Areas**

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- ACEC/Bald Eagle Core Site
- Wildlife Area/BG
- Proposed Well Pads
- Stimulation Pads



**MIDDLE MESA PLAN OF DEVELOPMENT**

FIGURE 4 - AERIAL MAP

SAN JUAN COUNTY, NEW MEXICO

T32N, R6W SECTION 33

T31N, R6W, SECTIONS 4, 9, 16, AND 17

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