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Bureau of Land Management**

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# **Operator Committed Measures**

BLM – Wyoming State Office

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**Petroleum Association of Wyoming – Reclamation Conference**

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# What are Operator Committed Measures?

- Measures volunteered by the proponent in the Proposed Action
- BLM suggested measures that are voluntarily agreed to by the proponent
  - Consistent with valid existing rights
- BMPs that the proponent voluntarily proposes and agrees to adhere to once the decision is issued

\*\*Designed to reduce environmental impacts of the project\*\*



# What are Operator Committed Measures?

- They can be specific, measurable practices
  - Example:
    - the Operator proposes to stay 500 feet away from the edge of perennial streams
- They can be broader in scope
  - Example:
    - The Operator will work with BLM and other agencies to minimize the disturbance of Gardner's saltbush



## What OCMs are NOT:

- Things the proponent is already required to do:
  - Compliance with applicable State or Federal law or regulation
    - E.g. Clean Water Act, Endangered Species Act, National Historic Preservation Act
  - Compliance with other permitting agency requirements
    - E.g. State agency requirements



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# How does the BLM consider OCMs?

- Via the National Environmental Policy Act process
  - Environmental Impact Statements
  - Environmental Assessments
- Applicable Decision Documents



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# How does the Operator benefit?

- Streamlines the BLM's permitting process
  - Providing mitigation upfront
  - Collaboration



## Example: Programmatic EIS

- Operator can propose any type of measures they are willing to commit to in their proposed action and through discussions with the BLM
  - Should not change regardless of operator leadership
- BLM conducts analysis, incorporating OCMs into programmatic alternatives
- BLM selects alternative and identifies measures as possible conditions of approval



## Example: Programmatic EIS

- Programmatic EIS approved –
  - Operator submits Application for Permit to Drill
  - Applicable OCMs from programmatic EIS are identified
  - BLM conducts tiered analysis which includes consideration of applicable conditions of approval
  - BLM grants permit with conditions of approval attached





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## Examples of Programmatic Environmental Impact Statements with Operator Committed Measures

### ➤ Jonah Infill Drilling Project

#### ➤ Examples:

- Minimal changes to topography
- Disturbance in prairie dog towns avoided
- No facilities within 300 feet of Sand Draw
- Developing and committing to the use of a transportation plan



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## Examples of Programmatic Environmental Impact Statements with Operator Committed Measures

- Normally Pressured Lance
  - Examples:
    - Mulching as a dust reduction technique
    - Revegetation of unused portions of the well site as soon as possible
    - Minimize disturbance to Gardner's saltbush



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## Examples of Programmatic Environmental Impact Statements with Operator Committed Measures

- Chokecherry-Sierra Madre Wind Energy Development
  - Examples:
    - Dust control
    - Reclamation of disturbed soils with weed-free native grasses, forbs, and shrubs
    - Roadway damage would be repaired



## Example: Stand alone Environmental Assessment

- Operator submits Application for Permit to Drill
  - Can submit application with OCMs already identified
- Site visit conducted
- BLM identifies measures at site visit and Operator may agree to voluntarily abide by these additional measures
  - Or, the BLM may consider applying these as COAs



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# Enforcement

- OCMs submitted as part of the APD or sundry notice become enforceable pieces of the permit
- Failure to comply may result in a BLM enforcement action



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# Questions?

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