

**Contrast and compare  
DOGM AND BLM well  
permitting process**

# TWO MAJOR DIFFERENCES IN THE PERMITTING PROCESS

## 1. LAND MANAGEMENT STATUS

- BLM is land management agency
- DOGM is a regulatory agency

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- BLM is land management agency
- DOGM is a regulatory agency

## 2. ENVIRONMENTAL ANALYSIS

- BLM requires a NEPA study
- DOGM requires a detailed pre-site evaluation

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- ▶ NEPA most pronounced effect was to set up procedural requirements for all federal government agencies actions

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## **1. *Categorical Exclusion --- CE***

- This a category of action where it is determined that there is no significant effect upon the quality of the environment

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- The purpose of the EA is to determine the significant of environmental effects and to look at alternative options
- Finding of No Significant Impact ---- FONSI

# NEPA has three levels of analysis

1. Categorical Exclusion --- CE
  - This a category of action where it is determined that there is no significant effect upon the quality of the environment
2. Environmental Assessment --- EA
  - The purpose of the EA is to determine the significant of environmental effects and to look at alternative options
  - Finding of No Significant Impact --- FONSI
3. **Environmental Impact Statement --- EIS**
  - If it is determined that a proposed federal action does not fall within a designated categorical exclusion or does not qualify for a FONSI, then the responsible agency or agencies must prepare an EIS.

# EIS – ENVIRONMENTAL IMPACT STATEMENT

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- ▶ Analysis of any adverse environmental impacts that cannot be avoided
- ▶ Reasonable alternatives
- ▶ The relationship between local short-term uses and long-term productivity
- ▶ Any irreversible effects if implemented.

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- ▶ The environmental impacts
- ▶ Analysis of any adverse environmental impacts that cannot be avoided
- ▶ Reasonable alternatives
- ▶ The relationship between local short-term uses and long-term productivity
- ▶ Any irreversible effects if implemented.
- ▶ Includes public, outside party and other federal agency input

# PERMITTING

- ▶ STATE LAW REQUIRES A PERMIT TO DRILL A WELL ANY WHERE IN UTAH
- ▶ FEDERAL LAW REQUIRES A PERMIT TO DRILL ON FEDERAL MANAGED LANDS (BLM, FOREST SERVICE MINERAL AND TRIBAL)
- ▶ **THEREFORE, FEDERAL MANAGED PROPERTIES NEED TWO PERMITS**
  - FEDERAL (BLM)
  - STATE (DOGM)

# TO IMPROVE EFFICIENCY AND AVOID DUPLICATIVE WORK ON A FEDERAL LEASE

## ▶ DOGM :

- Creates API # and map
- Check spacing or unit information
- Check for bonding (yes or no)
- Verifies lease status
- Reviews permit
- **DOGM APPROVES APD**
- DOGM defers to the BLM for engineering and environmental analysis (NEPA)

# DOGM PROCEDURE ON A PRIVATE LEASE OR A SITLA LEASE

## ▶ DOGM:

- Creates API # and map
- Check spacing or unit information
- Check for bonding (yes or no)
- Verifies lease status
- ~~DOGM APPROVES APD~~
- DOGM completes engineering
- DOGM completes environmental analysis (pre-site)
- Reviews permit
- DOGM approves APD

# DOGM PRE-EVALUATION

- ▶ Surface Use Plan

# DOGM PRE-EVALUATION

- ▶ Surface Use Plan
- ▶ Waste Management Plan

# DOGM PRE-EVALUATION

- ▶ Surface Use Plan
- ▶ Waste Management Plan
- ▶ Environmental Parameters

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- ▶ Reserve Pit

# DOGM PRE-EVALUATION

- ▶ Surface Use Plan
- ▶ Waste Management Plan
- ▶ Environmental Parameters
- ▶ Reserve Pit
- ▶ Reclamation Plan

# SUMMARY

- ▶ LAND MANAGEMENT STATUS OF THE BLM VERSUS THE REGULATORY AUTHORITY OF DOGM

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- ▶ LAND MANAGEMENT STATUS OF THE BLM VERSUS THE REGULATORY AUTHORITY OF DOGM
- ▶ LENGTH OF THE NEPA EVALUATION VERSES A DOGM PRE-SITE EVALUATION