

# OSAGE COUNTY OIL AND GAS EIS

## DRAFT ALTERNATIVES PUBLIC LISTENING SESSION

### Draft Alternatives Matrix

Under the Osage Allotment Act of 1906, the United States reserved all rights to the mineral estate in Osage County for the benefit of the Osage. The mineral estate is held in trust, and the BIA approves oil and gas leases, applications for permits to drill, and other site-specific permit applications in Osage County under the authority of the 1906 Act and 25 Code of Federal Regulations (CFR), Part 226.

The BIA, under delegation from the Secretary of the Interior, is responsible for administering the development of oil and gas resources in Osage County for the benefit of the Osage. The federal actions, including approvals of leases and issuance of permits, are needed for the BIA to fulfill a portion of its trust responsibility to the Osage and facilitate the development of the mineral estate.

The purpose of the BIA's action is to facilitate oil and gas production, in a manner that is efficient, environmentally compatible, and consistent with the mandates of federal law in coordination with the Osage Minerals Council. Through this action, the BIA also intends to streamline the permitting process and provide certainty to developers regarding permit conditions and restrictions.

<b>BIA Management Issue</b>	<b>No Action Alternative (Business as Usual)</b>	<b>Action Alternative 1 (Streamlined Management)</b>	<b>Action Alternative 2 (Upfront Protective Management)</b>
Regulatory Uncertainty	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions Terms in Osage Oil and Gas Leasing Regulations interpreted on a case-by-case basis	Standard resource conservation measures tailored to county-specific conditions and issues applied as permit conditions. Exceptions would apply where a listed resource conservation measure is not applicable or where a measure proposed by the permit applicant better achieves the purpose of the resource conservation measure.  Define "established watering places" to be protected by 200-foot buffers in 25 CFR 226.33	Same as Action Alternative 1, plus additional resource conservation measures proactively applied in areas to protect sensitive resources
Leasing	Leasing Programmatic Environmental Assessment (PEA)	Leasing PEA decisions would be applied through incorporation into the environmental impact statement	Same as Action Alternative 1

Other BMPs or resource conservation measures would be applied as needed to protect resources.



<b>BIA Management Issue</b>	<b>No Action Alternative (Business as Usual)</b>	<b>Action Alternative 1 (Streamlined Management)</b>	<b>Action Alternative 2 (Upfront Protective Management)</b>
	decisions are applied based on the standalone PEA	To be determined	To be determined
Workovers	Forthcoming Workover PEA decisions would be applied based on the standalone PEA	To be determined	To be determined
National Historic Preservation Act Compliance	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions and consultation under Section 106	Resource conservation measures applied as permit conditions on a case-by-case basis based on site-specific conditions and consultation under Section 106	Resource conservation measures applied as permit conditions to prohibit drilling within buffers of varying sizes around culturally sensitive areas. Buffers and criteria for variation defined in an appendix. Additional measures may be applied based on site-specific Section 106 consultation.
Endangered Species Act Compliance	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions and consultation with the US Fish and Wildlife Service under Section 10	Resource conservation measures applied as permit conditions based on consultation with the US Fish and Wildlife Service under Section 7.	Same as Action Alternative 1
Migratory Bird Treaty Act Compliance	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions	Resource conservation measures applied as permit conditions on a case-by-case basis based on site-specific conditions	Resource conservation measures applied as permit conditions to minimize destruction and fragmentation of grassland prairie habitat
Clean Water Act Compliance	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions	Resource conservation measures applied as permit conditions to contribute to compliance with Total Maximum Daily Loads (TMDLs; once established) for streams listed as impaired by oil and gas activities under Section 303(d)	Resource conservation measures applied as permit conditions to prevent further impairment of streams listed as impaired by oil and gas activities under Section 303(d) until TMDLs are established. Once TMDLs are established, resource conservation measures may be removed or replaced.
Safe Drinking Water Act Compliance	BMPs applied as permit conditions on a case-by-case basis based on site-specific conditions	Resource conservation measures applied as permit conditions to restrict oil and gas development in source water protection areas and groundwater wellhead protection areas	Same as Action Alternative 1

