

**OSAGE COUNTY OIL AND GAS EIS DRAFT ALTERNATIVE CONCEPTS**

April 6, 2017

**Preliminary Draft Alternatives Summary Table**

	<b>Alternative 1 – No Action</b>	<b>Alternative 2 – Emphasize Oil and Gas Development</b>	<b>Alternative 3 – Hybrid Alternative</b>	<b>Alternative 4 – Enhanced Resource Protection</b>
<b>Leases</b>	New Programmatic EIS. BMPs from Programmatic Environmental Assessment for Leasing Activities, November 2014 (Leasing PEA).	New Programmatic EIS. New BMPs provided at time of lease approval. BMPs would be recommended general standards intended to lessen the effects of oil and gas development on the environment (e.g., prevention of erosion), but would not dictate specific measures to be taken. If the measures the lessee takes to follow a BMP are insufficient to address the intent of that BMP, interim mitigation measures may be required. COAs attached to approved permits. COAs would be conditions the lessee is required to comply with in the conduct of oil and gas operations.	New Programmatic EIS. New BMPs provided at time of lease approval for leases in high density areas. BMPs would be recommended general standards intended to lessen the effects of oil and gas development on the environment (e.g., prevention of erosion), but would not dictate specific measures to be taken. If the measures the lessee takes to follow a BMP are insufficient to address the intent of that BMP, interim mitigation measures may be required. COAs attached to approved permits. COAs would be conditions the lessee is required to comply with in the conduct of oil and gas operations.	New Programmatic EIS.
<b>Workover Approvals</b>	New Programmatic EIS. BMPs from Programmatic Environmental Assessment for Approving Workover Operations, April 2015 (Workover PEA) as enforceable conditions of approval (COAs).	New Programmatic EIS. Implement use of Notice of Intent (NOI) and/or Sundry Notice to improve efficiency and expedite processing.	Same as Alternative 2.	New Programmatic EIS. Additional protective COAs for sensitive cultural and environmental resources.
<b>Drilling Permits</b>	New Programmatic EIS. Tiered environmental assessments (EAs).	New Programmatic EIS. Tiered EAs. Pursue categorical exclusion (CE) for wells drilled within same quarter-section within last five years.	New Programmatic EIS. Tiered EAs. Implement spacing requirements limiting well pad density in low-density areas.	New Programmatic EIS. Tiered EAs. Implement spacing requirements limiting well pad density.
<b>General Conditions of Approval (COAs)</b>	Include all standard BMPs as COAs. Add special conditions if necessary based on site-specific EA.	Minimize or waive most BMPs and COAs.	For high-density well areas, apply same COAs as Alternative 2. For low-density well areas, apply same COAs as Alternative 4. Applicable COAs would be reevaluated if the density of wells in an area changed.  Exception: Alternative 4 COAs would be applied in the following delineated sensitive areas regardless of the density of wells:	Same as Alternative 1, plus additional protective COAs for sensitive areas and special cultural and environmental resources.

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			<ul style="list-style-type: none"> <li>• Tallgrass Prairie Preserve</li> <li>• State parks</li> <li>• State wildlife management areas</li> <li>• USACE lakes and lakes used for public water supply</li> <li>• Municipalities</li> <li>• Public Water Supply wells and Wellhead Protection Areas</li> <li>• Areas of Class I Special Source Groundwater or areas designated as High Vulnerability</li> </ul>	
<b>ESA</b>	<p>For American Burying Beetle (ABB) compliance, BIA has prepared a Biological Assessment (BA), and USFWS would issue a Biological Opinion (BO) describing the total amount of acreage in the county where incidental take of ABB can occur. BIA would allow activities to proceed without a 45-day wait period where the ABB survey is negative as long as key COAs are applied.</p> <p>For other threatened and endangered species, the BO issued by the USFWS would establish parameters for improved efficiency of BIA consultation on other threatened and endangered species with preliminary no effect or may affect/not likely to affect determinations.</p>	<p>With key BMPs eliminated as COAs, BIA would likely need to revise the BA and reinitiate formal consultation under Section 7 of the ESA for ABB compliance. Until the new BO is issued, producers would be solely responsible for documenting compliance under Section 10 of the ESA. Where the ABB survey is negative, activities can only proceed without a 45-day wait period where BIA can justify a “no effect” determination.</p> <p>For other threatened and endangered species, without key BMPs as COAs, there would be no agreed parameters for consultation on other threatened and endangered species. The BA would be revised and informal consultation would be re-initiated.</p>	Same as Alternative 2. New BO would incorporate the hybrid approach.	Same as Alternative 1.
<b>NHPA</b>	Standard NHPA procedures apply. Add special COAs if necessary based on site-specific EA.	Same as Alternative 1.	Same as Alternative 1, plus apply no-drilling buffers around identified cultural sites. Additional COAs would be applied. Ensure compliance with Section 106 of the NHPA on a case-by-case basis, as necessary.	Same as Alternative 3.