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## Categorical Exclusion Form

**Project:** Buford Curtis, Inc. Rafferty Fee #1 Wellsite - Characterize and Delineate Contamination

**PIN:** 19634

**Date:** August 16, 2007

**Describe project, including location (reference the attached Environmental Screening Form, if appropriate), and list any mitigations:**

**Project Description:** The Buford Curtis, Inc. (Curtis) Rafferty Fee #1, an oil and gas producing well in the Neches Bottom and Jack Gore Baygall Unit of Big Thicket National Preserve, was plugged in December of 2002. As part of the plugging and abandonment process, surface equipment was removed from the location, some obviously contaminated site stabilization material and soil was removed from the site and replaced with clean fill, and the site was re-leveled. The National Park Service (NPS) completed a focused site investigation at the wellsite in 2005 with the goal of providing recommendations for the restoration of the site. Crude oil was detected above screening criteria during the focused site investigation. Contaminant migration pathways at the wellsite include soil-to-groundwater, groundwater migration and human/ecological uptake. Impacts appear to be limited to flora and fauna exposure to surface soil. Human contact with surface soil is possible, but this risk is limited by the use and location of the site. The NPS estimated that a minimum of 100 cubic yards of soils contaminated above screening criteria exist at the site. Additional soil and groundwater sampling is required to further delineate the extent of contamination. Curtis has provided the NPS with a work plan regarding additional sampling of soils and groundwater at the site. The objectives of this work are: 1) determine if shallow groundwater beneath the site is adversely impacted and 2) define the horizontal and vertical extent of soils where concentrations of crude oil exceed 10,000 parts per million. The information thus acquired would be used in the development of a plan of operations as per 36 CFR 9.36 to reclaim the site in accordance with the requirements of 36 CFR 9.39. Curtis has requested a temporary access permit as per 36 CFR 9.38 in order to perform the sampling described in the work plan. All activities would be conducted under the direct supervision and direction of a State of Texas registered Professional Geoscientist. Curtis anticipates that field activity would begin within 10 business days of receiving the temporary access permit. Field activity is expected to last 2 days. The NPS would observe the work onsite. Curtis proposes to install 1 temporary monitoring well and complete up to 10 shallow soil borings at the site. The temporary monitoring well would be completed with a truck-mounted drilling rig. This monitoring well is not expected to be advanced more than 30 feet below the ground surface. The soil borings would be made with a hand auger, and would be completed to a depth of 3 feet below the ground surface. Equipment would be continuously decontaminated during all sampling activities in accordance with applicable Texas Commission on Environmental Quality, United States Environmental Protection Agency and Occupational Safety & Health Administration guidelines. Soil sampling core barrels would be washed with Alconox soap and rinsed with potable water. Excess soil cuttings, groundwater from the development and purging of the temporary monitoring well and personal protective equipment generated during the sampling effort would be temporarily stored in sealed and properly labeled 55-gallon drums at the site. These materials would be removed at the completion of the sampling effort and properly disposed of. Field personnel would travel to and from the site in passenger vehicles.

**Project Locations:**

**Location**

**County:** Hardin

**State:** TX

**District:**

**Section:**

**Geo. Marker:**

**Other:**

(See Attached Environmental Screening Form)

**Mitigation(s):**

- A stop work provision in the event that previously undiscovered cultural resources are encountered would be a condition of the requested temporary access permit.

**Describe the category used to exclude action from further NEPA analysis and indicate the number of the category (see Section 3-4 of DO-12):**

E.6. Non-destructive data collection, inventory (including field, aerial, and satellite surveying and mapping), study, research, and monitoring activities (this is also a Departmental CE).

**Describe any public or agency involvement effort conducted (reference the attached ESF):**  
(See Attached Environmental Screening Form)

**On the basis of the environmental impact information in the statutory compliance file, with which I am familiar, I am categorically excluding the described project from further NEPA analysis. No exceptional circumstances (e.g. all boxes in the ESF are marked "no") or conditions in Section 3-6 apply, and the action is fully described in Section 3-4 of DO-12.**



**Park Superintendent**

Haigler "Dusty" Pate

**NPS Contact Person**

6044 FM 420, Kountze, TX 77625

**Address**

8/16/07

**Date**

Biologist, Oil and Gas Program Manager

**Title**

409 951-6822

**Phone number**

HHP  
08/16/07

**ENVIRONMENTAL SCREENING FORM (ESF)**  
**DO-12 APPENDIX 1**  
(Revised June 2004, per DM)

Today's Date: **August 16, 2007**  
**07/25/2007**

Date Form Initiated:

*This form should be attached to all documents sent to the regional director's office for signature. Sections A and B should be filled out by the project initiator (may be coupled with other park project initiation forms). Sections C, D, E, and G are to be completed by the interdisciplinary team members. While you may modify this form to fit your needs, you must ensure that the form includes information detailed below and must have your modifications reviewed and approved by the regional environmental coordinator.*

**A. PROJECT INFORMATION**

Park Name: **Big Thicket NP**

Project Title: **Buford Curtis, Inc. Rafferty Fee #1 Wellsite - Characterize and Delineate Contamination**

PEPC Project Number: **19634** PMIS Number:

Project Type: **Permit - Other (OP)**

Project Location: County, State: **Hardin, Texas**

Project Leader: **Haigler Pate**

Administrative Record Location: **BITH HQ, Kountze, TX**

Administrative Record Contact: **Haigler Pate**

**B. PROJECT DESCRIPTION/LOCATION**

*(To begin the statutory compliance file attach to this form maps, site visit notes, agency consultation, data, reports, categorical exclusion form (if relevant), or other relevant materials).*

**The Buford Curtis, Inc. (Curtis) Rafferty Fee #1, an oil and gas producing well in the Neches Bottom and Jack Gore Baygall Unit of Big Thicket National Preserve, was plugged in December of 2002. As part of the plugging and abandonment process, surface equipment was removed from the location, some obviously contaminated site stabilization material and soil was removed from the site and replaced with clean fill, and the site was re-leveled. The National Park Service (NPS) completed a focused site investigation at the wellsite in 2005 with the goal of providing recommendations for the restoration of the site. Crude oil was detected above screening criteria during the focused site investigation. Contaminant migration pathways at the wellsite include soil-to-groundwater, groundwater migration and human/ecological uptake. Impacts appear to be limited to flora and fauna exposure to surface soil. Human contact with surface soil is possible, but this risk is limited by the use and location of the site. The NPS estimated that a minimum of 100 cubic yards of soils contaminated above screening criteria exist at the site. Additional soil and groundwater sampling is required to further delineate the extent of contamination. Curtis has provided the NPS with a work plan regarding additional sampling of soils and groundwater at the site. The objectives of this work are: 1) determine if shallow groundwater beneath the site is adversely impacted and 2) define the**

horizontal and vertical extent of soils where concentrations of crude oil exceed 10,000 parts per million. The information thus acquired would be used in the development of a plan of operations as per 36 CFR 9.36 to reclaim the site in accordance with the requirements of 36 CFR 9.39. Curtis has requested a temporary access permit as per 36 CFR 9.38 in order to perform the sampling described in the work plan. All activities would be conducted under the direct supervision and direction of a State of Texas registered Professional Geoscientist. Curtis anticipates that field activity would begin within 10 business days of receiving the temporary access permit. Field activity is expected to last 2 days. The NPS would observe the work onsite. Curtis proposes to install 1 temporary monitoring well and complete up to 10 shallow soil borings at the site. The temporary monitoring well would be completed with a truck-mounted drilling rig. This monitoring well is not expected to be advanced more than 30 feet below the ground surface. The soil borings would be made with a hand auger, and would be completed to a depth of 3 feet below the ground surface. Equipment would be continuously decontaminated during all sampling activities in accordance with applicable Texas Commission on Environmental Quality, United States Environmental Protection Agency and Occupational Safety & Health Administration guidelines. Soil sampling core barrels would be washed with Alconox soap and rinsed with potable water. Excess soil cuttings, groundwater from the development and purging of the temporary monitoring well and personal protective equipment generated during the sampling effort would be temporarily stored in sealed and properly labeled 55-gallon drums at the site. These materials would be removed at the completion of the sampling effort and properly disposed of. Field personnel would travel to and from the site in passenger vehicles.

Preliminary drawings attached? Yes No

Background information attached? Yes No

Target compliance completion date:

Projected advertisement/Day labor start:

Construction start date:

Is project a hot topic (controversial or sensitive issues that should be brought to attention of Regional Director)? **No**

### C. RESOURCE EFFECTS TO CONSIDER:

*(Please see section F, Instructions for Determining Appropriate NEPA Pathway, prior to completing this section. Also, use the process described in DO-12, 2.9 and 2.10; 3.5; 4.5(G) to (G)(5) and 5.4(F) to help determine the context, duration, and intensity of effects on resources.)*

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Data Needed to Determine/Notes
1. Geologic resources – soils, bedrock, streambeds, etc.		X			In a previously disturbed area.
2. From geohazards	X				
3. Air quality		X			Internal combustion engine use in passenger vehicles and a truck mounted drilling rig.

4. Soundscapes			X		Internal combustion engine use in passenger vehicles and a truck mounted drilling rig.
5. Water quality or quantity		X			Installation of a temporary groundwater monitoring well and use of Alconox soap and potable water (obtained offsite) during decontamination procedures. Produced water would be removed from the site.
6. Streamflow characteristics	X				
7. Marine or estuarine resources	X				
8. Floodplains or wetlands	X				
9. Land use, including occupancy, income, values, ownership, type of use	X				
10. Rare or unusual vegetation – old growth timber, riparian, alpine	X				
11. Species of special concern (plant or animal; state or federal listed or proposed for listing) or their habitat	X				
12. Unique ecosystems, biosphere reserves, World Heritage Sites	X				BITH is a UNESCO Biosphere Reserve. No change in that designation is expected from the implementation of this proposal.
13. Unique or important wildlife or wildlife habitat	X				
14. Unique or important fish or fish habitat	X				
15. Introduce or promote non-native species (plant or animal)	X				It is possible that non-native plant propagules could be transported into the area on passenger vehicles or the drilling rig. However, the location of the site on an existing road reduces the possible

					impact of such non-native plant material.
16. Recreation resources, including supply, demand, visitation, activities, etc.	X				
17. Visitor experience, aesthetic resources		X			Impacts to soundscapes and air quality could affect visitor experience. The presence of personnel onsite is also a visual intrusion. However, the location of this site is off of an existing road, and the number and type of personnel and equipment proposed for use would not be "out of place."
18. Archeological resources	X				Limited ground disturbance would take place. However, this is a previously disturbed area.
19. Prehistoric/historic structure	X				
20. Cultural landscapes	X				
21. Ethnographic resources					
22. Museum collections (objects, specimens, and archival and manuscript collections)	X				
23. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure		X			
24. Minority and low income populations, ethnography, size, migration patterns, etc.	X				
25. Energy resources	X				
26. Other agency or tribal land use plans or policies	X				
27. Resource, including energy, conservation potential, sustainability	X				
28. Urban quality, gateway communities, etc.	X				

29. Long-term management of resources or land/resource productivity	X				
30. Other important environment resources (e.g. geothermal, paleontological resources)?	X				

Comments:

#### D. MANDATORY CRITERIA

<b>Mandatory Criteria: If implemented, would the proposal:</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comment or Data Needed to Determine</b>
A. Have significant impacts on public health or safety?		X		
B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?		X		
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?		X		
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?		X		
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?		X		
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant,		X		

environmental effects?				
G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?		X		
H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?		X		
I. Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment?		X		
J. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?		X		
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)?		X		
L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?		X		See C. 15.

For the purpose of interpreting these procedures within the NPS, any action that has the potential to violate the NPS Organic Act by impairing park resources or values would constitute an action that triggers the DOI exception for actions that threaten to violate a federal law for protection of the environment.

## E. OTHER INFORMATION

*(Please answer the following questions/provide requested information.)*

Are personnel preparing this form familiar with the site?

Did personnel conduct a site visit? **Yes** *(If yes, attach meeting notes or additional pages noting when site visit took place, who attended, etc.)*

Is the project in an approved plan such as a General Management Plan or an Implementation Plan with an accompanying NEPA document? **Yes**

If so, plan name:



## **BITH GMP BITH OGMP**

Is the project still consistent with the approved plan? **Yes** *(If no, you may need to prepare plan/EA or EIS.)*

Is the environmental document accurate and up-to-date? **Yes** *(If no, you may need to prepare plan/EA or EIS.)*

FONSI ROD (Check) Date approved:

Are there any interested or affected agencies or parties? **Yes**

Did you make a diligent effort to contact them? **Yes**

Has consultation with all affected agencies or tribes been completed? **Yes**

*(If yes, attach additional pages re: consultations, including the name, dates, and a summary of comments from other agencies or tribal contacts.)*

Are there any connected, cumulative, or similar actions as part of the proposed action? (e.g., other development projects in area or identified in GMP, adequate/available utilities to accomplish project)?

**Yes**

*(If yes, attach additional pages detailing the other actions.)* The results of the study will lead to the implementation of a reclamation plan for the site.

## **F. INSTRUCTIONS FOR DETERMINING APPROPRIATE NEPA PATHWAY**

First, always check DO-12, section 3.2, "Process to Follow" in determining whether the action is categorically excluded from additional NEPA analyses. Other sections within DO-12, including sections 2.9 and 2.10; 3.5; 4.5(G)(4) and (G)(5), and 5.4(F), should also be consulted in determining the appropriate NEPA pathway. Complete the following tasks: conduct a site visit or ensure that staff is familiar with the site's specifics; consult with affected agencies, and/or tribes; and interested public and complete this environmental screening form.

If your action is described in DO-12 section 3.3, "CE's for Which No Formal Documentation is Necessary," follow the instructions indicated in that section.

If your action is not described in DO-12, section 3.3, and IS described in section 3.4, AND you checked YES or identified "data needed to determine" impacts in any block in section D (Mandatory Criteria), this is an indication that there is potential for significant impacts to the human environment, therefore, you must prepare an EA or EIS or supply missing information to determine context, duration and intensity of impacts.


If your action is described in section 3.4 and NO is checked for all boxes in section D (Mandatory Criteria), and there are either no effects or **all** of the potential effects identified in section C (Resource Effects to Consider) are no more than minor intensity, usually there is no potential for significant impacts and an EA or EIS is not required. If, however, during internal scoping and further investigation, resource effects still remain unknown, or are at the minor to moderate level of intensity, and the potential for significant impacts may be likely, an EA or EIS is required.

In all cases, data collected to determine the appropriate NEPA pathway must be included in the administrative record.

## **G. INTERDISCIPLINARY TEAM SIGNATORIES**

*All interdisciplinary team members sign as directed or deemed necessary by the Superintendent. By*


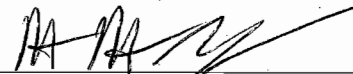
*signing this form, you affirm the following: you have either completed a site visit or are familiar with the specifics of the site; you have consulted with affected agencies and tribes; and you, to the best of your knowledge, have answered the questions posed in the checklist correctly.*

<b>Interdisciplinary Team Leader Name</b>  Haigler Pate	<b>Field of Expertise</b> Project Leader
<b>Technical Specialists Names</b> Jay Boisseau Linda Dansby Haigler Pate Haigler Pate Haigler Pate Pete Penoyer Gary Rosenlieb	<b>Field of Expertise</b> Other Advisor Technical Support NEPA Specialist NHPA Specialist Project Leader Other Advisor Other Advisor

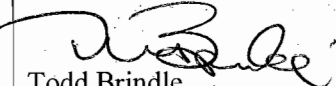
#### H. SUPERVISORY SIGNATORY

*Based on the environmental impact information contained in the statutory compliance file and in this environmental screening form, environmental documentation for this stage of the subject project is complete.*

Recommended:

<b>Compliance Specialist</b> NEPA--Haigler Pate  NHPA--Haigler Pate 	<b>Telephone Number</b> 409-951-6822 409-951-6822
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Approved:

<b>Superintendent</b>  Todd Brindle <b>Date</b> 08/16/2007	<b>Telephone Number</b> (409) 951-6801
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