

CHECKLIST ENVIRONMENTAL ASSESSMENT

Proposed Action: Approve Drilling Permit (Form 22)

Project/Well Name: Flynn 2-27-35-20

Operator: Behm Energy, Inc.

Location: S2 NE Section 27 35N-20E

County: Blaine MT; **Field (or Wildcat):** Wildcat

Proposed Project Date: 9/22/2022

I. DESCRIPTION OF ACTION

Behm Energy, Inc plans to drill a vertical oil well with the objective formation being the Sawtooth, 4,470' TVD/MD.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED

Montana Bureau of Mines and Geology, GWIC website (Blaine County Wells).

US Fish and Wildlife, Region 6 website

ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES, Blaine County

Montana Natural Heritage Program Website (FWP)

Heritage State Rank= S1, S2, S3, T35N R20E

Montana Cadastral Website

Surface Ownership and surface use Section 27 T35N R20E

Montana Department of Natural Resources MEPA Submittal

2. ALTERNATIVES CONSIDERED

No Action Alternative: The proposed well would not be drilled.

Action Alternative: Behm Energy, Inc. would have permission to drill the well.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

PLAINTIFFS'
EXHIBIT

P233

3. AIR QUALITY

Long drilling time: No, 4-5 days.
Unusually deep drilling (high horsepower rig): No.

Possible H2S gas production: No H2S anticipated.
In/near Class I air quality area: No.
Air quality permit for flaring/venting (if productive): Yes, DEQ air quality permit required under 75-2-211. AQB review.

Comments: No special concerns – using small rig to drill to 4,470' TD. If there are no gas gathering systems nearby, associated gas can be flared under Board Rule 36.22.1220.

4. WATER QUALITY

Salt/oil based mud: Water based mud to be used.
High water table: There may be a high water table in this area. A vulnerable area is located about ½ of a mile to the west from the proposed location.
Surface drainage leads to live water: No, nearest drainage is Fifteenmile Creek about 1/2 of a mile to the west.

Water well contamination: No water wells within a ½ mile radius.

Porous/permeable soils: No, sandy clay.
Class I stream drainage: No.
Groundwater vulnerability area: Location is near a groundwater vulnerability area.

Mitigation:

- Lined reserve pit
- Adequate surface casing
- Berms/dykes, re-routed drainage
- Closed mud system
- Off-site disposal of solids/liquids (in approved facility)

Comments: Steel surface casing will be run to 350' and cemented to surface to protect ground water. (Rule 36.22.1001).

5. SOILS/VEGETATION/LAND USE

Vegetation: Grassland.
Stream crossings: None anticipated.
High erosion potential: No, location requires a small cut of 1.2' and a small fill of 4.7'.
Loss of soil productivity: No, location will be restored after drilling, if nonproductive.

Unusually large wellsite (Describe dimensions): No, 250' X 250'.

Damage to improvements: Slight, surface use is grassland.

Conflict with existing land use/values: Slight.

Mitigation

- Avoid improvements (topographic tolerance)
- Exception location requested
- Stockpile topsoil
- Stream Crossing Permit (other agency review)
- Reclaim unused part of wellsite if productive
- Special construction methods to enhance reclamation

Access Road: Access will be off Cherigan Road and a new access of ¾ of a mile will be built into location.

Drilling fluids/solids: Drilling mud and cuttings will be stored in a steel tank closed system then will be buried in an onsite pit.

6. HEALTH HAZARDS/NOISE

Proximity to public facilities/residences: Closest residence is about 2 miles to the east.

Possibility of H2S: None anticipated.

Size of rig/length of drilling time: Single derrick rig, 4-5 days drilling time.

Mitigation:

- Proper BOP equipment
- Topographic sound barriers
- H2S contingency and/or evacuation plan
- Special equipment/procedures requirements
- Other:

7. WILDLIFE/RECREATION

Sage Grouse: In general habitat. Program analysis received 8/12/2022.

Proximity to sensitive wildlife areas (DFWP identified): None.

Proximity to recreation sites: None.

Creation of new access to wildlife habitat: None.

Conflict with game range/refuge management: None.

Threatened or endangered Species: Species listed as endangered or threatened are the Pallid Sturgeon, Whooping Crane, Black-footed Ferret, and Piping Plover. The Montana Natural Heritage Program Website lists eleven (11) species of concern: Swift Fox, Sprague's Pipit, Golden Eagle, Burrowing Owl, Ferruginous Hawk, Chestnut-collared Longspur, Greater Sage-Grouse, Baird's Sparrow, Loggerhead Shrike, Long-billed Curlew, and the Thick-billed Longspur.

Mitigation:

- Avoidance (topographic tolerance/exception)
- Other agency review (DFWP, federal agencies, DNRC Trust Lands, **Montana Sage Grouse Habitat Conservation Program**)
- Screening/fencing of pits, drillsite
- Other:

Comments: Private grassland. There may be species of concern that maybe impacted by this wellsite.

We ask the operator to consult with the surface owner as to what he would like done, if a species of

concern is discovered at this location. The Board of Oil & Gas has no jurisdiction over private surface lands. No concerns.

IV. IMPACTS ON THE HUMAN POPULATION

8. HISTORICAL/CULTURAL/PALEONTOLOGICAL

Proximity to known sites:

Mitigation

avoidance (topographic tolerance, location exception)

other agency review (SHPO, DNRC Trust Lands, federal agencies)

Other:

9. SOCIAL/ECONOMIC

Substantial effect on tax base

Create demand for new governmental services

Population increase or relocation

Comments: No concerns.

IV. SUMMARY

No long term impacts expected. Some short term impacts will occur, but can be mitigated.

I conclude that the approval of the subject Notice of Intent to Drill (does/**does not**) constitute a major action of state government significantly affecting the quality of the human environment, and (does/**does not**) require the preparation of an environmental impact statement.

EA Checklist Prepared By:	Name: John Gizicki	Date: 08/12/22
	Title: Compliance Specialist	