Priority & Commitment To Plan Evaluation

Bucket 2 – Council Selected Restoration Component

PROPOSAL TITLE

Abandoned Oil and Gas Well Plugging and Site Reclamation

PROPORAL NUMBER

DOI-3

LOCATION

LA and TX: 7 FWS National Refuges in LA, 9 NWR in TX, 1 NPS unit LA, 2 NPS units TX

SPONSOR(S)

Department of Interior

TYPE OF FUNDING REQUESTED (Planning, Technical Assistance, Implementation)

Planning/Technical Assistance/Implementation

REVIEWED BY:

Ebonye T. Allen

DATE:

13 February 2015

A. Comprehensive Plan Goals

Of the goals addressed by the proposal, which is the single primary goal?
Proposals should discuss how the proposed activity is designed to address the primary goal.
Check one:

- (●) Restore and Conserve Habitat – Restore and conserve the health, diversity and resilience of key coastal, estuarine and marine habitats.
- ( ) Restore Water Quality – Restore and protect water quality of the Gulf Coast region's fresh, estuarine and marine waters.
- ( ) Replenish and Protect Living Coastal and Marine Resources – Restore and protect healthy, diverse and sustainable living coastal and marine resources.
- ( ) Enhance Community Resilience – Build upon and sustain communities with capacity to adapt to short- and long-term changes.
- ( ) Restore and Revitalize the Gulf Economy – Enhance the sustainability and resiliency of the Gulf economy.

Notes:

As stated in the proposal, abandoned oil and gas features include unplugged oil, gas, and water wells and saltwater disposal wells, plugged wells located in waterways that pose navigational hazards, tank batteries and production equipment, pipelines, roads and dredged channels, well and production pads, and other associated developments and equipment. In the proposal, there are 52 projects that would result in reclaiming over 6,600 acres. Eleven projects are located in the Gulf Intracoastal Waterway, rivers or canals. Seven projects are located on barrier islands. The majority of the remaining projects are located in wetlands, with high functional fish and wildlife values. Sixteen (16) sites have visual evidence of hydrocarbon staining or waste pits that require characterization and remediation of contaminants.

B. Comprehensive Plan Objectives

Proposals must clearly identify which objectives the proposal will address

1. Restore, Enhance, and Protect Habitats

- [x] YES
- [ ] NO
- [ ] Not articulated
- [ ] N/A

2. Restore, Improve, and Protect Water Resources

- [x] YES
- [ ] NO
- [ ] Not articulated
- [ ] N/A

3. Protect and Restore Living Coastal and Marine Resources

- [x] YES
- [ ] NO
- [ ] Not articulated
- [ ] N/A

4. Restore and Enhance Natural Processes and Shorelines

- [x] YES
- [ ] NO
- [ ] Not articulated
- [ ] N/A

Notes:

8. Of these objectives which is the single primary objective the proposal addresses?

Check one:

- (●) Restore, Enhance, and Protect Habitats
- ( ) Restore, Improve, and Protect Water Resources
- ( ) Protect and Restore Living Coastal and Marine Resources
- ( ) Restore and Enhance Natural Processes and Shorelines
- ( ) Promote Community Resilience
- ( ) Promote Natural Resource Stewardship and Environmental Education
- ( ) Improve Science-Based Decision-Making Processes

C. RESTORE Act and Comprehensive Plan Priority Criteria

All proposals must explain if the proposal addresses one or more of the priority criteria as established by the RESTORE Act and Initial Comprehensive Plan and, if so, how.

1. This project is projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.

(●) YES ( ) NO ( ) Not articulated ( ) N/A

2. This is a large-scale project/program that is projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.

(●) YES ( ) NO ( ) Not articulated ( ) N/A

3. This project is contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.

( ) YES (●) NO

4. This project will restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the *Deepwater Horizon* oil spill.

(●) YES ( ) NO

5. Promote Community Resilience

(●) YES ( ) NO ( ) Not articulated ( ) N/A

6. Promote Natural Resource Stewardship and Environmental Education

(●) YES ( ) NO ( ) Not articulated ( ) N/A

Notes:

As indicated in the proposal, the 52 individual projects in this proposal are entirely focused on restoring habitat disturbed by abandoned oil and gas wells and associated well pads and access roads/canals covering over 6,600 acres located in 3 units of the National Park System and 16 U.S. Fish and Wildlife Service National Wildlife Refuges in LA and TX's Gulf Coast Region. Completing the 52 projects in this proposal would restore habitat disturbed by abandoned oil and gas wells and associated well pads and access roads/canals, after which no further action would be needed.

D. Comprehensive Plan Commitments

All proposals must demonstrate how the proposal will achieve any or all of the commitments in the Comprehensive Plan. The commitments in the Comprehensive Plan are as follows:

Does the proposal articulate how it will achieve the following commitments in the comprehensive plan?

1. Science-based Decision-Making

(●) YES ( ) NO ( ) Not articulated

Notes:

As stated in the submission, this proposal would meet the secondary objective to improve science-based decision-making processes by applying best management practices. Wells would be plugged or replugged using technical standards for plugging wells established in State Oil and Gas Division plugging rules, and BLM's Onshore Oil and Gas Order #2. For contaminants characterization and remediation, and site reclamation, methodologies are well-established. FWS and NPS have a particularly strong understanding of the ecosystems they manage and extensive experience restoring native plant communities. The restoration of vehicle tracks in the wind tidal flats in Padre Island National Seashore would be carried out in a methodical, phased approach, utilizing science-based decision-making processes. Initially, a technical team consisting of

2. Regional Ecosystem-based Approach to Restoration

(●) YES ( ) NO ( ) Not articulated

Notes:

As stated in the submission, this proposal includes 52 projects in 16 FWS and 3 NPS areas in the States of Louisiana and Texas, located within the Gulf Coast region. Habitat restoration is based on achieving 70% (NPS) to 80% (FWS) cover with native vegetative species.

3. Engagement, Inclusion, and Transparency

(●) YES ( ) NO ( ) Not articulated

Notes:

As stated in the submission, this proposal envisions a collaborative approach between FWS, NPS and State Oil and Gas Divisions to achieve the mutual goal of Abandoned Oil and Gas Well Plugging and Site Reclamation. Many of the projects in this proposal would be implemented through this Cooperative Agreement. The reclamation of vehicle tracks in the wind tidal flats at Padre Island National Seashore (TX) would have an initial design and testing phase that would be implemented through an existing Cooperative Education Studies Unit (CESU) agreement between the NPS and University of Texas at Corpus Christi.

4. Leveraging Resources and Partnerships

(●) YES ( ) NO ( ) Not articulated

Notes:

As stated in the proposal, FWS and NPS propose to implement many of the projects in this proposal through Cooperative Agreements with State Oil and Gas Divisions, and the reclamation of vehicle tracks in wind tidal flats in Padre Island National Seashore (TX) through an existing Cooperative Education Studies Unit (CESU) agreement with the University of Texas at Corpus Christi.

5. Delivering Results and Measuring Impacts

(●) YES ( ) NO

Notes:

As stated in the proposal, results would be immediately achieved upon plugging the abandoned wells by meeting State Oil and Gas plugging standards or the Bureau of Land Management's Onshore Order No. 2 plugging standards. Results would be achieved in reclaiming sites when 70-80% cover with native vegetation has been attained, when canals are backfilled, and spoilbanks and shorelines are restored.

E. Meeting Commitments and Tracking and Measuring Progress

1. Does the proposal articulate how it will meet and achieve its commitments?

(●) YES ( ) NO ( ) Not articulated

2. Does the proposal have a plan for tracking and measuring progress?

(●) YES ( ) NO

Notes:

As stated in the proposal, FWS and NPS would implement the projects through Cooperative Agreements with State Oil and Gas Divisions. Cooperative Agreements would provide one method for tracking project status and budget. FWS and NPS would also maintain separate tracking systems to track progress in completing projects and monitoring expenditures. Reclamation of abandoned oil and gas sites would be monitored by the State Oil and Gas Divisions' contract point of contact, with assistance from FWS and NPS staff. Monitoring revegetation would be the primary responsibility of the reclamation contractor, but FWS and NPS would also be monitoring. Revegetation success would be monitored for 2 years following initial reseeding and plantings. Should monitoring show revegetation is not progressing as planned, or that invasive species have

F. Proposal Emphasis Areas

Does the submission describe how the proposed project or program addresses the following four considerations:

1. Is the proposed activity **foundational** in the sense that the project or program forms an initial core step (or steps) in addressing a significant ecosystem issue, and can future activities be tiered to substantially increase the benefits?

(●) YES ( ) NO ( ) Not articulated

Notes:

As stated in the proposal, the 52 individual projects comprising this proposal present varied degrees of risk to human safety, habitat degradation, and potential for impacting water quality. In general, wells needing plugging or replugging pose the highest risk and resource impacts, followed by sites requiring characterization and remediation of petroleum and other contaminating substances, then removal of abandoned surface equipment, and reclamation of sites to restore and protect habitats and water quality.

2. Will the proposed activity be **sustainable** over time?

(●) YES ( ) NO ( ) Not articulated

Notes:

The proposal describes specific steps in completing 52 individual projects to restore habitat disturbed by abandoned oil and gas wells and associated well pads and access roads/canals. Upon completing the projects, habitat would be restored; therefore, there would be no further action needed.

3. Is the proposed activity **likely to succeed**?

(●) YES ( ) NO ( ) Not articulated

Notes:

The proposal describes the experience that FWS and NPS have with the work proposed and how the agencies will collaborate with State Oil and Gas Divisions.
As stated in the proposal, success for the proposed project would be achieved when the following goals are met:
-Abandoned wells are plugged.
-Abandoned plugged wells posing navigational hazards have been cut below the mudline and replugged as needed.
-Abandoned oil and gas sites have been reclaimed, and revegetation has been achieved with 70% to 80% cover of native species.

4. Does the proposed activity **benefit** the human **community**?
(examples of benefits may include, but are not limited to: how a project will utilize local workers, how a project will benefit geographically or socially vulnerable communities, how a project will benefit the natural resources critical to natural-resource dependent industries such as fisheries, tourism, etc.)

- (●) YES
- ( ) NO
- ( ) Not articulated

Notes:

As stated in the proposal, in some cases, FWS and NPS would hire seasonal or term staff to carry out site reclamation projects, or to assist in administering project coordination, providing opportunities for students and veterans to work and gain knowledge and experience in habitat restoration. Application and monitoring of the experimental restoration method(s) carried out at Padre Island National Seashore (TX) would be conducted through an existing Cooperative Education Studies Unit (CESU) agreement between NPS and the University and carried out by graduate and possibly undergraduate students, with oversight of a university professor. Through the various implementation methods described in the proposal, greater than 100 jobs are anticipated to be created. Opportunities for engagement of youth to work on projects and learn about habitat