

## INTERMOUNTAIN FIELD AREA COMPLIANCE CERTIFICATION

This form is to be attached to all documents sent to the Field Director for signature (Finding of No Significant Impact, Statement of Findings, Record of Decision).

All activities were carried out in accordance with the National Environmental Policy Act, the Council on Environmental Quality Guidelines (40 CFR et seq.), the Department of Interior Manual (Part 516), and NPS-12, National Environmental Policy Act Guideline. All other appropriate compliance procedures (\$106 of National Historic Preservation Act, §7 of Endangered Species Act, American Indian Religious Freedom Act, etc.) were also followed and completed.

As shown on the attached review checklist, all required procedural steps are complete.

Park: Padre Island National Seashore

Project #: PAIS 97-01

Project Title: Plan of Operations ENRON Oil and Gas Company

## Park Preparer

Paul H. Eubank

Name

1-29-97  
Date

Environmental Protection Specialist

Title

Superintendent

[Signature]

1-29-97  
Date

## REVIEW CHECKLIST

Project ENRON Oil and Gas Company  
Plan of Operations Date \_\_\_\_\_  
PAIS 97-01

- ✓ Information included, no further action necessary  
0 Information missing, needs to be included  
? Unsure if information is included, add if not  
N/A Not applicable

## FONSI

Include EA or a summary of it, may incorporate by reference ..... ✓

Public involvement results shown ..... ✓

All other required compliance is referenced and is complete ..... ✓

FONSI includes the following paragraph: ..... ✓

Negative environmental impacts that could occur are minor and temporary in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, known ethnographic resources, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Concludes with statement that the project does not constitute a major federal action significantly affecting the quality of the human environment and that an EIS will not be prepared ..... ✓

Signed by Field Director ..... 0

## REVIEW CHECKLIST

Project ENRON Oil and Gas Company Date \_\_\_\_\_  
Plan of Operations

- ✓ Information included, no further action necessary  
 0 Information missing, needs to be included  
 ? Unsure if information is included, add if not  
 N/A Not applicable

## ENVIRONMENTAL ASSESSMENTS

Need for the proposal ..... ✓  
 No-action alternative ..... ✓  
 Other alternatives ..... ✓  
 Preferred identified (endangered species, wetlands, floodplains) ..... ✓  
 Relationship to existing plans ..... NA  
 Environmental impacts:  
   Beneficial and adverse effects ..... ✓  
   Direct and indirect effects ..... ✓  
   Short- or long-term effects ..... ✓  
   Cumulative effects ..... ✓  
 Must state whether or not effects on:  
   Endangered species (include threatened, candidate, and state listed species) ..... ✓  
   Floodplains/wetlands ..... ✓  
   Archeological, historic, or ethnographic resources ..... ✓  
 List of persons and agencies contacted ..... ✓  
 Public involvement accomplished ..... ✓  
 References cited ..... ✓  
 Preparer(s) name, title ..... ✓

## **ENVIRONMENTAL ASSESSMENT OF THE UPDATED PLAN OF OPERATIONS**

**for the Existing Amoco Production Company  
South Sprint Fieldwide Gas Unit  
Padre Island National Seashore  
Kleberg County, Texas  
November 1996**

### **PURPOSE OF AND NEED FOR ACTION**

The National Park Service has received for approval, a revised Plan of Operations prepared for Amoco Production Company by Carter: Burgess. Amoco Production Company has a Plan of Operations that was approved November 1987. The New Plan of Operations addresses the changes in the operation of the South Sprint Fieldwide Gas Unit at Padre Island National Seashore and complies with 36 CFR 9.40(a). The Plan of Operations has been determined to be substantially complete and was accepted by the Superintendent, Padre Island National Seashore, on November 27, 1996 for formal processing.

The Field Director, Intermountain Field Area, will either approve or reject the plan after it has been reviewed and evaluated in accordance with the National Environmental Policy Act and the Nonfederal Oil and Gas Rights Regulations (36 CFR 9B). Approval of the plan is contingent upon additional information or modifications that may result from public and agency review. An approved Plan of Operations would serve as the permit for continued operation of the South Sprint Fieldwide Gas Unit and associated wells.

### **Background**

Padre Island National Seashore was established by Public Law 87-712, on September 28, 1962, "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped."

The enabling legislation for Padre Island National Seashore allows for the exploration and extraction of oil and gas, subject to the Nonfederal Oil and Gas Rights Regulations (Title 36 of the Code of Federal Regulations, Part 9, Subpart B). The regulations require that a Plan of Operations be prepared for exploration and extraction activities. Operations predating the implementation of the regulations, which became effective January 8, 1979, are allowed to continue without an approved Plan of Operations until the operation is transferred to a new owner and/or requires new State or Federal permitting. New operations are permitted only under an approved Plan of Operations.

Oil and gas exploration and production has been actively pursued on Padre Island since the early 1950's. Currently, there are 6 active oil and gas wells and 5 pipelines operating in the park.

Padre Island is the largest undeveloped barrier island in the United States. The National Seashore is approximately 70 miles-in length and from ½ to 3 miles in width. The park consists of approximately 130,000 acres of land and water and has an annual visitation of approximately 875,000. The park is bordered on the east by the Gulf of Mexico and on the west by the Laguna Madre, a shallow, hyper-saline body of water. The island features change from sandy beaches to the fore-island dunes, then to a grassy plains, comprised of small dunes, ponds and interspersed marshes, then to back-island dunes and mudflats, that merge into the Laguna Madre.

Natural resource information for the proposed operations is provided in Plan of Operations (Page 16). Cultural resource information for the proposed operations is located in appendix B, Section 3.7 in the 1987 Plan of Operations.

### **PROPOSED ACTION AND ALTERNATIVES**

#### **Proposed Action: Approve the Plan of Operations with Additional Stipulations, as Identified During Public and Agency Review**

Amoco Production Company has operated the South Sprint Fieldwide Gas Unit for nine years under an approved Plan of Operations. The operation has been upgraded and has changed from the operation approved November 1986. Amoco has developed and implemented many mitigating measures to further minimize impacts to natural resources. The applicable measures contained in the Plan include:

- Amoco has installed secondary containment throughout the entire facility.
- Produced waters and condensate are removed from the park by tanker trucks.
- Amoco required the contract compressor to be equipped with a "hospital muffler" to reduce noise impacts.

#### **No-Action**

A "No-Action" alternative is presented to provide a benchmark for evaluating the other action alternatives. "No-Action" means the continuation of present trends and conditions. In this case, under "no-action", the 1986 Plan of Operations would remain in affect. Amoco would be able to continue to operate at the 1986 standard. Produced water was disposed of in an eight foot sump at the base of the condensate tank. Upsets would occur in the gun barrel operation that would release condensate into the ground water. Drips, spills and accidents would allow oil and chemicals to be released onto the soils. This alternative would be contrary to the Organic Act of 1916, the National Park Service is charged with management of the parks to " ... to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

### Other Alternatives considered but Dropped

One alternative considered but dropped from further evaluation would be to "Approve the Plan as Submitted." Amoco has cooperated with the National Park Service to develop a revised Plan of Operations which meets all of the current information needs specified at 36 CFR 9.36, and which addresses additional National Park Service concerns. The decision to approve the Plan without providing public notice and making the Plan available for review and comment would violate 36 CFR 9B regulations, and would negate public involvement in the decision making process as encouraged by the National Environmental Policy Act.

### ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION AND ALTERNATIVES

The National Park Service has determined that the following critical elements would be affected by the proposed action and no-action alternatives. Only those element marked "yes" are discussed further:

| <u>Critical Elements</u>       | <u>Affected</u> |          |
|--------------------------------|-----------------|----------|
|                                | Yes             | No       |
| Air Quality/Noise Levels       | <u>X</u>        | —        |
| American Indian Religious Uses | —               | <u>X</u> |
| Cultural/Historical Resources  | —               | <u>X</u> |
| Farmlands, Prime/Unique        | —               | <u>X</u> |
| Floodplains                    | —               | <u>X</u> |
| Hazardous Materials            | <u>X</u>        | —        |
| Scenic Values                  | —               | <u>X</u> |
| Threatened/Endangered Species  | —               | <u>X</u> |
| Vegetation                     | <u>X</u>        | —        |
| Water Quality                  | —               | <u>X</u> |
| Wetlands                       | —               | <u>X</u> |
| Wildlife                       | <u>X</u>        | —        |

### Environmental Consequences of the Proposed Action:

#### Impacts of the Proposed Action on Air Quality/Noise Levels:

Air emissions are expected to be released from hydrocarbon vapors, the exhaust emissions from stationary compressor engines and the introduction of motor vehicles. These emissions are expected to disperse quickly in the normal winds of Padre Island. Average wind speed in the Corpus Christi vicinity is 10+ mph. These emissions are expected to be within the standards of

the Texas Natural Resource Conservation Commission (TNRCC) exemptions for oil and gas production.

Noise levels have increased from background during the operation of the South Sprint Fieldwide Gas Unit. Amoco has worked with the park to minimize the increased noise from the operation of the compressor. The compressor is operating with a hospital muffler with catalytic converter to reduce emissions and noise. . Prevailing southeast winds minimize noise detected by park visitors on the gulf beaches. Compressors of one type or another have operated at the facility for over five years. Wildlife in the area have become accustomed to the noise of the facility.

Impacts of the Proposed Action on Floodplain Values:

Padre Island National Seashore, with the exception of the primary dune line, lies within the 100 year floodplain. Amoco location is sited behind and adjacent to the primary dune line. Amoco has re-worked their facility installing secondary containment under the tank battery and over the fire walls. Secondary containment has been installed under bulk oil and corrosion chemical containers. Gas lines are vented into tanks to collect any liquids associated with the production of natural gas. Amoco South Sprint facility is sited to minimize impacts to floodplain values.

In the event of a hurricane threatening Padre Island National Seashore, the Park's Hurricane Preparedness Plan would be implemented. Amoco would have sufficient time to shut down the operations, empty tanks of product, and to fill them with water.

Impacts of the Proposed Action on Hazardous Materials:

The potential for release of hazardous or toxic materials exists. Amoco has prepared a Contaminating or Toxic Substance Spill Control Plan that is site-specific for Padre Island National Seashore, Appendix E. Amoco has in place an impermeable liner over the berm and in the tank battery. The material safety data sheets for all toxic and/or hazardous material are on-site and located in Appendix E.

Impacts of the Proposed Action on Scenic Values:

The scenic values of the park are protected by the siting of the Amoco facility behind the primary dune line. The facility is visible briefly while looking down the access road when driving south on the beach. The facility is painted in earth tone colors, blending into the surrounding area.

Impacts of the Proposed Action on Threatened and Endangered Species:

No Federally listed threatened or endangered plant species are known to occur at Padre Island National Seashore.

Several animals identified at Padre Island National Seashore are included on the Federal list of

threatened (T) or endangered (E) species include: Peregrine falcon (Falco peregrinus anatum and (Falco peregrinus tundrius)(E), Brown pelican (Pelecanus occidentalis)(E), Piping plover (Charadrius melodus)(E), Green sea turtle (Chelonia mydas)(T), Kemp's Ridley sea turtle (Lepidochelys kempi)(E), Loggerhead sea turtle (Caretta caretta)(T), Leatherback sea turtle (Dermochelys coriacea)(E), and the Hawksbill sea turtle (Eretmochelys imbricata)(E).

The Texas coast averages one sea turtle nest per year with the majority documented on Padre Island. Additionally, park staff locate and care for an average of ten stranded hatchlings washed in on the tide yearly. Gaugers and contractors are contacted on a yearly basis to watch for and report the sightings of sea turtles.

The Peregrine falcon stages on Padre Island National Seashore during the spring and fall migration. On-going scientific studies report numbers of falcons to be 800+ during the migration on the southern end of the park. The greatest number of Peregrine falcons utilize the wind tidal flats approximately two miles south of Yarbrough Pass to South Padre Island. However, Peregrine falcons could be observed anywhere on Padre Island. Amoco's continuing operation is not expected to impact the Peregrine falcon.

The Brown pelican utilizes the Gulf of Mexico and the Laguna Madre for feeding. The Piping plover is observed on Padre Island ten months a year (August through May). They utilize the wind tidal flats, the washover channels, and the gulf beaches for resting and feeding. Access to the Amoco facility is by driving on the beach. Piping plovers resting and feeding on the beach tolerate vehicle traffic. Any adverse impacts to the species would be insignificant and short term. The proposed operation is not expected to have an impact on either the Brown pelican or the Piping plover.

#### Impacts of the Proposed Action on Vegetation:

Vegetation has stabilized the dune areas around the Amoco facility. Vegetation within the area used in the production of natural gas is trimmed mechanically to reduce the threat of fire.

#### Impacts of the Proposed Action on Wetlands:

The South Sprint Fieldwide Gas Unit is located in an upland area and avoids wetland impacts. Approximately 5000 feet of flowline runs through isolated wetlands to a junction with Houston Pipeline. Maintenance activities would fall under Corps of Engineers Nationwide Permit #3.

#### Impacts of the Proposed Action to Wildlife

Wildlife that utilized the grounds now occupied by the Amoco facility have been displaced for over 10 years. The wildlife would have had to adapt or perish due to displacement. Wildlife surrounding the facility have adapted to the noise and presence of human intervention.

#### Impacts of the Proposed Action to Wildlife:

Wildlife currently using the area proposed for the project would be displaced during the construction, drilling, production, and reclamation. The loss of this habitat is not expected to have a measurable impact on wildlife populations.

#### Cumulative Impacts of the Proposed Action:

Cumulative oil and gas impacts are both spatial and temporal, and occur when the effects of an activity are added to those existing in a given area and/or they accumulate over time.

There are currently 6 active oil and gas operations within Padre Island National Seashore. These operations include: five natural gas wells, one oil well, one salt water disposal well, and one water well. In addition, five companies operate pipelines that account for approximately 70 miles of pipeline in the park. These operations also have access roads associated with them. There are 53 abandoned oil and gas sites in the park, dating back as far as 1951. Many abandoned sites are no longer discernible because of the changing nature of the barrier island ecosystem concealing, obscuring or destroying sites, such as in the case of hurricane washovers and migratory dune fields. Good operating methods employed by some operators in the past resulted in complete restoration of sites. Other sites that have still not revegetated completely show that operating methods are important to successful and timely restoration.

#### **Environmental Consequences of the Alternative, No-Action**

The no-action alternative entails rejecting the Plan of Operations. Current conditions would be maintained; therefore, noise level, air quality, scenic values, vegetation, wetlands, and other resource conditions would remain the same. Increased protection of natural resources that would result from the additional mitigative measures to reduce or minimize leaks and spills would not be realized under this alternative.

#### **CONSULTATION AND COORDINATION**

The following agencies and organizations were consulted during the preparation of the Plan of Operations and writing of this Environmental Assessment:

Intermountain Office of Minerals/Oil and Gas Support, National Park Service, Santa Fe,  
New Mexico

Geologic Resources Division, Mining Operations Branch, National Park Service  
Denver, Colorado

U.S. Fish and Wildlife Service, Ecological Services,  
Corpus Christi, Texas

### **Preparers**

This Environmental Assessment was prepared by Paul H. Eubank, Environmental Protection Specialist, Padre Island National Seashore and Linda Dansby, Environmental Protection Specialist, Intermountain Office of Minerals/Oil and Gas Support, National Park Service, Santa Fe, New Mexico.

