



NEPA Categorical Exclusion Determination Form

Program or Field Office: U.S. Department of Energy (DOE) Office of Legacy Management (LM)

Project Title: Install and Maintain Aerial Survey Quality Control Monuments, Perform Aerial Surveys, and Abandon Wells at the Naturita, Colorado, Disposal Site

Location: Naturita, Colorado, Disposal Site

Proposed Action or Project Description:

LM is proposing to conduct the following actions at the Naturita, Colorado, Disposal Site, which is approximately 15 miles northwest of Naturita, Colorado:

1. Install and maintain four permanent aerial survey quality control monuments and perform aerial surveys, such as light detection and ranging (lidar), orthophotogrammetry, thermal scanning, and multispectral scanning.
2. Abandon five existing groundwater monitoring wells.

Install and Maintain Aerial Survey Quality Control Monuments, Perform Aerial Surveys

All monuments would be installed adjacent to the site's engineered disposal cell. Monument construction equipment would be driven on existing site roads or tracks whenever possible. Excavations would be approximately 3 feet wide and 2 feet deep and monument survey rods driven approximately 4 feet deep. Monuments would be installed by the Legacy Management Support (LMS) contractor or a subcontractor under LMS contractor supervision. Construction of the monuments is scheduled for 2021. Maintenance of the monuments would be conducted in out years as needed.

Aerial surveys are expected to be conducted by unmanned aerial vehicles, also called drones, but possibly by manned aircraft. Manned aircraft would take off and land at a nearby airport. No aviation activities would commence until required flight safety plans are approved by a certified DOE aviation manager and permission is received from the LM site manager. The need to perform follow-up aerial surveys would depend, in part, upon results of the baseline aerial survey, which is expected to occur in 2022. Follow-up aerial surveys, as needed, would require new flight safety plans approved by a certified DOE aviation manager and the LM site manager.

Abandon Groundwater Monitoring Wells

Wells designated as BR95-1, BR95-2, BR95-3, CM93-1, and CM93-2, which are around the site perimeter, would be abandoned. Wells would be accessed using existing site roads or an existing cobble riprap-covered drainage channel. Minor grading of existing site roads might be necessary.

Prior to abandoning wells, vegetation would be cut around each well by the LMS contractor. Vegetation roots would not be damaged. Revegetation would occur as a result of natural processes. If ground disturbance or vegetation clearing could affect ground-nesting birds, work would be paused to determine avoidance and mitigation measures before work proceeds. Well abandonment would be done by a licensed drilling subcontractor, with oversight provided by the LMS contractor, in accordance with applicable Colorado well abandonment regulations. Well abandonment waste fluids would be disposed at an appropriate offsite facility. Wastes generated from well abandonment are not expected to be contaminated with hazardous substances requiring special management. Once the wells are abandoned, the subcontractor and LMS contractor would jointly complete a well abandonment report for each of the five wells for submittal to the Colorado State Engineer. Well abandonment is tentatively scheduled for 2021.

On April 8, 2021, the Colorado State Historic Preservation Office agreed with LM's determination that no historic property would be affected by the proposed actions.



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Categorical Exclusion(s) Applied:

- B1.3 Routine maintenance
- B3.1 Site characterization and environmental monitoring
- B3.2 Aviation activities
- B5.3 Modification or abandonment of wells

For the complete DOE National Environmental Policy Act (NEPA) regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of Title 10 *Code of Federal Regulations* Section 1021 (10 CFR 1021).

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

- The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

- There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized by the LM Director per DOE Policy 451.1), I have determined that the proposed action fits within the specified classes of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer Signature and
Determination Date

JOYCE CHAVEZ Digitally signed by JOYCE CHAVEZ
Date: 2021.05.13 15:09:31 -06'00'