

2.0 THE PROPOSED ACTION AND ALTERNATIVES

This EA analyzes the impacts of the Proposed Action and the No Action Alternative for ten Raderville wells proposed to be drilled by BBC on federally-owned mineral estate within and directly adjacent to the Wallace Creek Unit in southwestern Natrona County, Wyoming. These ten wells would test the commercial productivity of the Raderville Formation within the analysis area. The only other alternative considered available or reasonable in this EA is the No Action Alternative.

2.1 THE PROPOSED ACTION

BBC proposes to drill ten development wells on federal oil/gas leases both within and directly adjacent to the Wallace Creek Unit located approximately 12 miles south of Waltman, Wyoming, in Sections 15, 21, 22, 27, and 28, Township 34 North, Range 87 West as shown in Table 2.1 and Figure 2.1.

Table 2.1

Raderville Wells Proposed by BBC in the Wallace Creek Area

Well Name and Number	Legal Location of Well				Lease Number	Surface Ownership
	Quarter	Section	Township	Range		
Stone Cabin #24-21R	SE¼SW¼	21	34 North	87 West	WYW-0588A	U.S.A.
Stone Cabin #32-21R	SW¼NE¼	21	34 North	87 West	WYW-47520	State
Stone Cabin #11-27R	NW¼NW¼	27	34 North	87 West	WYW-017575A	State
Stone Cabin #13-27R	NW¼SW¼	27	34 North	87 West	WYW-139717	U.S.A.
Stone Cabin #31-28R	NW¼NE¼	28	34 North	87 West	WYW-139717	Russell Forgey
Wallace Creek Unit #43-15R	NE¼SE¼	15	34 North	87 West	WYW-0588A	Russell Forgey
Wallace Creek Unit #11-22R	NW¼NW¼	22	34 North	87 West	WYW-0588A	State
Wallace Creek Unit #13-22R	NW¼SW¼	22	34 North	87 West	WYW-47620	State
Wallace Creek Unit #32-22R	SW¼NE¼	22	34 North	87 West	WYW-47620	Russell Forgey
Wallace Creek Unit #41-27R	NE¼NE¼	27	34 North	87 West	WYW-017575A	Russell Forgey

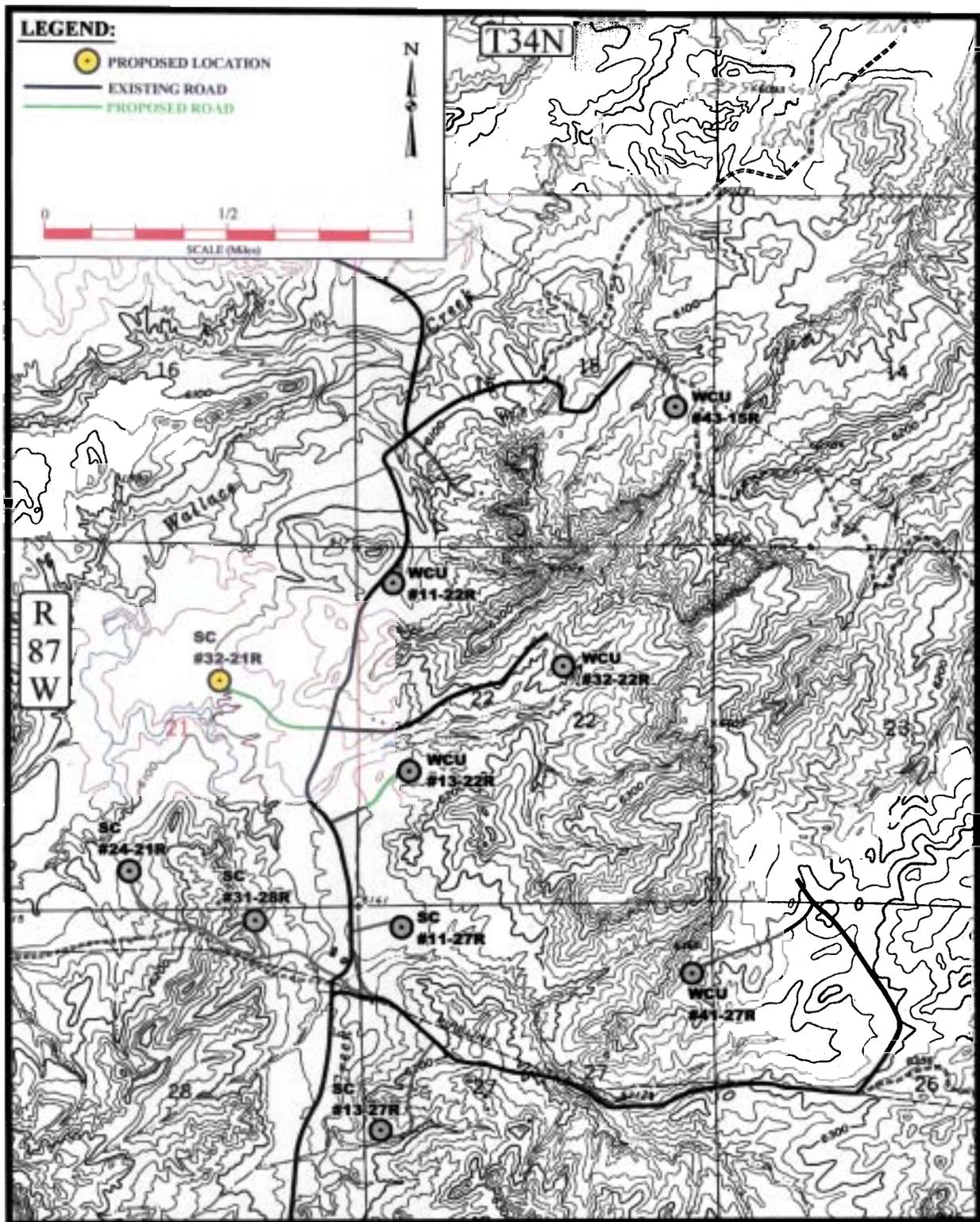


Figure 2.1: Raderville Formation Wells Proposed by Bill Barrett Corporation

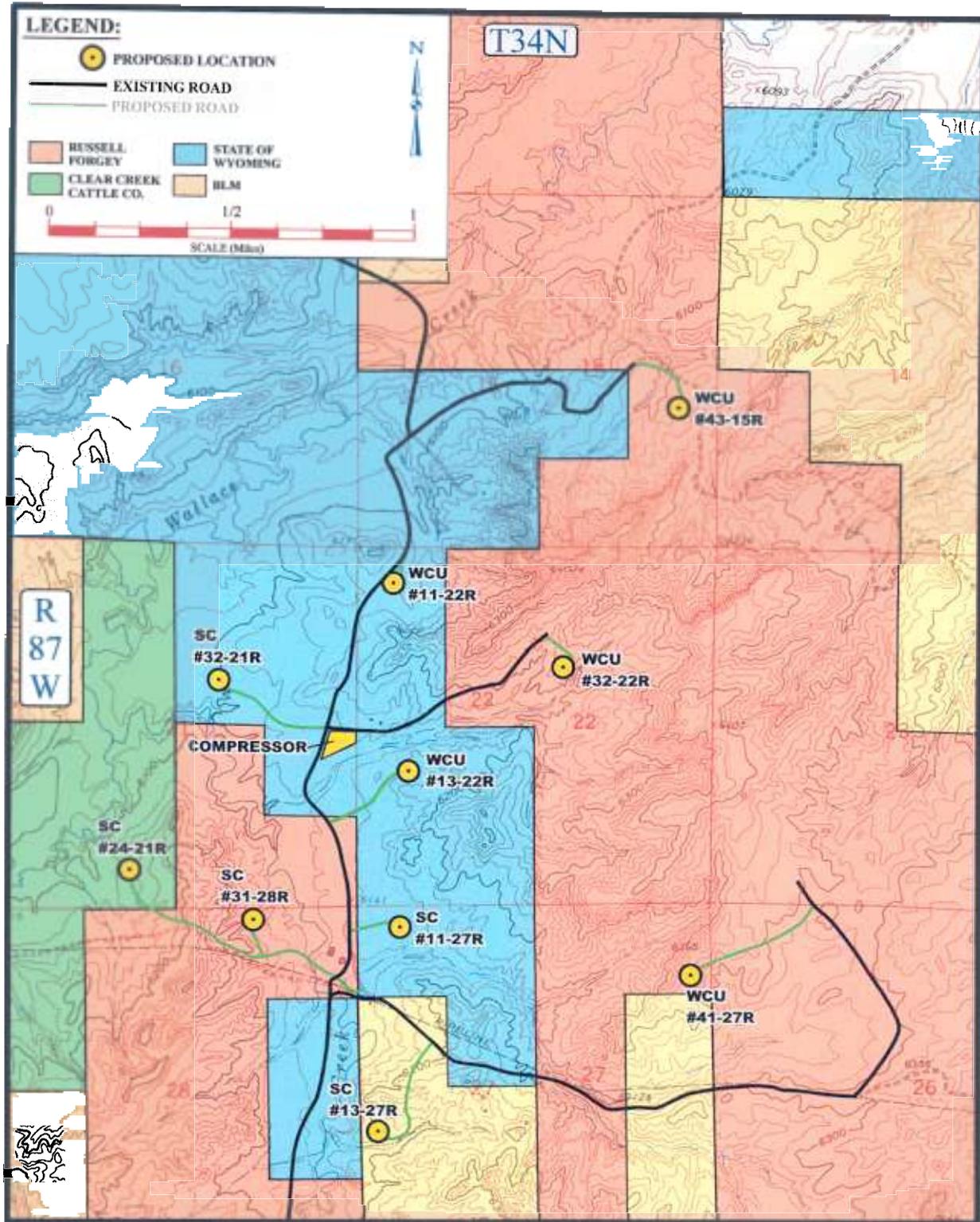


Figure 2.2: Surface Ownership in the Wallace Creek Project Area

Drilling would be initiated as soon as all necessary permits are obtained. Preliminary drilling results coupled with the subsequent testing of the initial wells drilled in the project area would dictate the subsequent drilling schedule for the remaining wells. It is anticipated that all ten wells would be drilled within one to two years of permit approval. All lease and/or unit operations would be conducted in full compliance with all applicable laws, regulations (43 CFR 3100), *Onshore Oil and Gas Orders*, the approved plan of operations, and any applicable Notices to Lessees.

2.1.1 Construction and Drilling Operations

Activities for each well would follow practices and procedures outlined in each individual Application for Permit to Drill (APD) and the Conditions of Approval appended thereto by the Casper Field Office, BLM. Access road, well pad, and pipeline construction activities would follow guidelines and standards as set forth in the joint BLM/U.S. Forest Service (USFS) publication: *Surface Operating Standards for Oil and Gas Exploration and Development* (aka "The Gold Book"). Sufficient topsoil to facilitate revegetation would be segregated from subsoil material during construction operations and stockpiled for future reclamation of the disturbed areas. The salvaged topsoil would be evenly distributed over those disturbed surfaces subject to reclamation upon termination of drilling and completion operations as part of the reclamation and revegetation program. Topsoil stockpiles would be stabilized with vegetation (annual ryegrass) until used for reclamation purposes.

The level area of the well pad required for drilling and completion operations (including the reserve pit) would be approximately 325' x 230' (1.72 acres) in overall size. Minor deviations will occur in the overall size of individual well locations due to topographic constraints and efforts by both BLM and BBC to limit surface disturbances in certain circumstances (including, but not limited to, areas of extensive cuts and/or fills, proximity to ephemeral drainages, etc.) as determined at the time of the on-site inspections. Maximum disturbance at each location would be approximately 2.25 acres, including the area(s) required for cut/fill slopes and topsoil/subsoil stockpiles. Construction of all ten well locations would result in approximately 22.5 acres of new surface disturbance within the project area.

An existing, upgraded (crowned & ditched with a native soil running surface) oilfield road provides primary access to the project area from Natrona County Road #212. Access to the ten proposed Raderville Fm. well locations would require the construction of approximately 9,493 feet (1.80 miles) of new access road, resulting in the initial disturbance of an additional 8.72 acres (based on a maximum clearing width of forty feet). In addition, approximately 5,471 feet (1.04 miles) of existing road would require upgrading for access to the proposed wells, resulting in an additional 5.02 acres of surface disturbance. Table 2.2 provides the amount of road to be either constructed (new road) or reconstructed (existing road/trail to be upgraded) for access to each of the ten proposed well locations.

Table 2.2

Access Road(s) to be Either Constructed or Reconstructed to the Raderville Wells Proposed in the Wallace Creek Area

Well Name and Number	New Access Road	Existing Road to be Upgraded
Stone Cabin #24-21R	3,863'	-----
Stone Cabin #32-21R	-----	1,619' ¹
Stone Cabin #11-27R	291'	-----
Stone Cabin #13-27R	-----	1,699' ¹
Stone Cabin #31-28R	437'	-----
Wallace Creek Unit #43-15R	863'	2,153' ¹
Wallace Creek Unit #11-22R	196'	-----
Wallace Creek Unit #13-22R	1,290'	-----
Wallace Creek Unit #32-22R	642'	-----
Wallace Creek Unit #41-27R	1,911'	-----
TOTALS	9,493'	5,471'¹

Shown in GREEN as "Proposed Road" on Figure 2.1 since new surface disturbance will be involved in upgrading these existing roads.

Whenever possible, access roads would be designed and constructed to disturb less than the forty foot ROW width referenced above, as long as traffic and safety concerns could be satisfied. The existing access roads would be maintained as necessary to accommodate appropriate year-round traffic and prevent unnecessary erosion.

Roads would be constructed in accordance with BLM Manual Section 9113 and/or the roading standards outlined in the joint BLM/USFS publication: *Surface Operating Standards for Oil and Gas Exploration and Development* and would be designed by a professional engineer as directed by the BLM. Table 2.3 provides a summary of surface disturbance associated with well pad and access road construction for each of the ten proposed well locations.

Pipelines to tie each individual well location into a new field-wide gathering system would typically parallel the access road constructed into each individual well location to the greatest extent possible, resulting in less overall surface disturbance associated with initial right-of-way (ROW) clearing and subsequent pipe installation. Please refer to Section 2.1.5 for additional information regarding pipelines and the proposed gas gathering system.

From fifteen to twenty-one days would be required to drill, log, and case each well using a conventional rotary drill rig and associated rig equipment. Cuttings and all drilling fluids would be contained in the reserve pit as specified in the individual APD's.

Table 2.3

Acres of Surface Disturbance Associated with Access Road and Well Pad Construction in the Wallace Creek Area

Well Name and Number	Access Road	Well Location	Disturbance Per Well
Stone Cabin #24-21R	3.55	2.25	5.80
Stone Cabin #32-21R	1.49	2.25	3.74
Stone Cabin #11-27R	0.27	2.25	2.52
Stone Cabin #13-27R	1.56	2.25	3.81
Stone Cabin #31-28R	0.40	2.25	2.65
Wallace Creek Unit #43-15R	2.77	2.25	5.02
Wallace Creek Unit #11-22R	0.18	2.25	2.43
Wallace Creek Unit #13-22R	1.18	2.25	3.43
Wallace Creek Unit #32-22R	0.59	2.25	2.84
Wallace Creek Unit #41-27R	1.76	2.25	4.01
TOTALS	13.75	22.50	36.25

Reserve pits constructed in porous subsoil materials (e.g., sand, gravels, fractured rock) would be lined with a plastic/vinyl liner (12 mil minimum) in order to prevent the loss of drilling fluids through seepage. Liners would not be required in clayey subsoils. The reserve pit would be fenced “sheep tight” with woven wire mesh having two top strands of barbed wire held in place by metal posts and wooden corner “H” braces to protect livestock and wildlife as recommended in the joint BLM/USFS publication: *Oil and Gas Surface Operating Standards for Oil and Gas Exploration and Development, Third Edition*.

Fluids that accumulate in the reserve pit during drilling and completion operations would be contained therein and would be allowed to evaporate prior to the reclamation of said pit. Once free of liquids, the reserve pit would be reclaimed by backfilling the pit with the sub-soil (spoil) material removed therefrom during construction. Once the pit has been backfilled, a portion of the stockpiled topsoil would be evenly distributed (spread) over the reclaimed area and reseeded in accordance with the specifications of either the BLM or private surface owner (as appropriate).

Approximately 23,000 barrels (bbl) of fresh water (966,000 gallons) would be required to drill each well. This water would be obtained from either the Wallace Creek Unit #102 well located in the SE¼NE¼ of Section 22, T34N, R87W or an existing water well owned by Russell Forgey Construction, Inc. located in the SE¼SW¼ of Section 9, T34N, R87W. Water would be diverted from the Forgey water well under a *Temporary Water Use Agreement* to be approved by the office of the Wyoming State Engineer. In either case, water would be hauled via tank truck from

the point of diversion to each individual Raderville Fm. well. Any shallow, fresh water zones encountered during drilling would be reported and adequately protected as required under *Onshore Oil and Gas Order Number One*.

Upon completion of drilling operations, the well would be logged, and production casing would be set to total depth in accordance with the drilling program as approved in the APD including any Conditions of Approval appended thereto. The setting and cementing of the production casing string would isolate all downhole formations, effectively eliminating fluid communication between hydrocarbon zones and/or water aquifers and other mineral resources.

Construction of well pads and access roads would require a maximum of three workers for a period of approximately five days per well location. These workers would include both heavy equipment operators engaged in construction of the access road and well pad as well as truck drivers engaged in hauling heavy equipment to and from the location. These construction workers are typically employed by local companies, with said companies contracted by BBC for the construction of the roads, well pads, and pipelines associated with this proposed development.

A rotary drilling rig of the size and type necessary to drill these Raderville Fm. wells would typically employ four workers per eight hour shift with one crew on shift and two crews off. These crews would either return to their homes or other living quarters in nearby towns - BBC currently has no plans for the installation of a "man camp" to house entire crews associated with the drilling of these wells. A small number of additional personnel may be required to be on location during various stages of the drilling operation including a geologist, mud logger, and other service personnel. In some cases, these individuals would be required to remain on location twenty-four hours a day once drilling operations begin and small trailers with self-contained sanitary systems would be provided on-site for their use.

2.1.2 Completion Operations

Once the well is drilled and production casing set, a completion (workover) unit would move on-site to begin completion operations. Completion operations would normally take approximately ten to fifteen additional days. A bond log would be run, casing would be perforated in potentially productive zones downhole, the formation may be subjected to various stimulation procedures (including, but not limited to, fracturing), production tubing would be run, a production test would be run and, if successful, the well would be set up for production.

2.1.3 Production Operations

These Raderville Fm. wells would be expected to produce varying proportions of natural gas and oil with minor quantities of produced water once production equipment is set and the well begins

to produce. Production equipment anticipated in conjunction with each well would primarily include a “Christmas tree” (valve assembly) at the well head, a separator where entrained liquid hydrocarbons (condensate or oil) would be separated from the gas stream, and tanks for the storage of both produced water and liquid hydrocarbons. Once the liquids have been separated from the gas stream, the “dry” gas would be metered on location for allocation purposes prior to introduction into the gas gathering system for delivery to the expanded Wallace Creek compressor station located on State of Wyoming surface estate in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 21, T34N, R87W. The expanded compressor facility will include a Wauk 1,450 horsepower (hp) low emission compressor, a dehydration unit, and gas scrubber. The existing facility will remain in place until compression requirements are established for the overall area and may be decommissioned within one to two years. It should be noted that the expansion of the existing compressor facility is not dependent upon the proposed Raderville Fm. project and would be installed by BBC regardless of the productive capabilities of these ten Raderville Fm. wells. Please refer to Section 2.1.4 for additional information on the expanded compressor station.

All permanent (on-site for six months or longer) above-the-ground structures constructed or installed on the well location (including pumping units, tank batteries, etc.) not subject to safety considerations would be painted *Carlsbad Canyon* (Munsell standard color #2.5Y 6/2) as specified in the approved APD. BBC would submit a schematic diagram showing the proposed production facility layout to the BLM for approval prior to commencing installation operations.

All areas not required for ongoing production operations would be reclaimed as specified in the approved APD. Approximately 0.57 acres of the well pad (area equal to 200' X 125') would be required for production operations, the remaining 1.68 acres of the constructed well pad would be reclaimed by backfilling, recontouring, and reseeding as specified in the approved APD.

2.1.4 Expanded Compressor Station

As indicated above, BBC proposes to install an expanded compressor station in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 21, T34N, R87W within the Wallace Creek Unit. The proposed compressor station expansion would include a Wauk 1,450 hp compressor, a dehydration unit, and a flare to control the dehydration still vent emissions. Installation of the expanded compressor station would involve the disturbance of approximately 3.41 acres of surface estate owned by the State of Wyoming. Ultimately, the expanded compressor station would replace the existing Wallace Creek compressor station and could process gas produced from the ten proposed Raderville wells at some point in the future.

2.1.5 Gas Gathering System

BBC proposes to install a gas gathering system to transport gas produced from each of the proposed Raderville Fm. wells to the compressor station located in the SW $\frac{1}{4}$ SW $\frac{1}{4}$ NW $\frac{1}{4}$ of

Section 22, T34N, R87W and thence to a tie-in with an existing gas transmission (sales) line at a point located approximately in the SW $\frac{1}{4}$ NW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 27, T34N, R87W. This gas gathering system would involve the installation of approximately 8,778 feet of four inch steel line to collect gas from each individual well location, approximately 16,701 feet of “main” twelve inch steel line to transport gas collected from the individual wells to the existing/upgraded compressor site, and approximately 3,838 feet of ten inch steel “discharge” line to transport gas from the existing/upgraded compressor site to the gas sales line referenced above (see Figure 2.3).

In addition, BBC proposes to install approximately 14,086 feet of twelve inch steel line from the Stone Cabin Unit #1 well location (NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 11, T34N, R87W) to the existing compressor station located in the NW $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 22, T34N, R87W. This proposed line largely parallels the access road to the subject well, does not cross any federal surface estate on/along the proposed pipeline ROW, and would be installed in a fifty-foot ROW. The subject twelve inch line would also gather gas produced from the Stone Cabin Unit #2 well location (NE $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 15, T34N, R87W) and the proposed Wallace Creek Unit #43-15R well location listed in Table 2.1. An additional 1,794 feet of four inch steel pipeline would be installed from the Stone Cabin Unit #31-21 well location (NW $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 21, T34N, R87W) to a connection with the twelve inch line referenced above. This line would parallel the existing road and would be installed in a twenty-five foot ROW. These three Stone Cabin wells were drilled earlier this year by BBC to test the productive potential of the Muddy Formation.

These pipelines would be buried in a maximum fifty foot right-of-way and would be installed parallel to existing/proposed access roads and/or pipeline ROW's to the greatest extent possible. The disturbed ROW width for pipelines installed parallel to existing/proposed roads would be reduced from fifty feet to twenty-five feet for construction operations along/adjacent to these access road ROW's. While there is an older, existing gathering system currently in place, BBC feels that the existing line(s) are inadequate to transport the volumes of gas expected to be produced from the ten proposed Raderville Fm. wells; consequently, a new gas gathering system is being proposed. Surface disturbances associated with the installation of the gas gathering system would equal approximately 20.41 acres - 12.56 acres based upon a twenty-five foot disturbed ROW width, with an additional 7.85 acres associated with a fifty foot ROW width for the 6,838 feet of pipeline ROW which would either parallel an existing, revegetated (reclaimed) pipeline ROW (3,838') or would be routed cross-county (2,580' of 12" line and 420' of 4" line). An additional 17.20 acres of surface disturbance would result from the installation of the 14,086 feet of twelve inch line from the Stone Cabin #1 to the compressor station in Section 22, with the 1,794 feet of four inch line installed to gather gas produced from the Stone Cabin #31-21 resulting in an additional 1.03 acres of surface disturbance. Table 2.4 provides a breakdown of the lengths of each segment of pipeline by pipe size and discloses the amount of surface disturbance associated therewith.

It should be noted that the numbers presented in Table 2.4 reflect a parallel pipeline ROW where the 3, 838 feet of ten inch “discharge” line will be installed along with (parallel to) the 3,838 feet of twelve inch line in a common fifty-foot ROW and approximately ten feet apart

Table 2.4

Surface Disturbance Associated with the Proposed Wallace Creek Gas Gathering System

Size of Pipeline	25' ROW Width	Acres of Disturbance	50' ROW Width	Acres of Disturbance	Total ROW Length	Total Disturbance
12 Inch Line	13,521'	7.76 ac	16,666'	19.13 ac	29,967'	26.89 ac
10 Inch Line	-----	-----	3,838'	4.41 ac	3,838'	4.41 ac
4 Inch Line	10,152'	5.83 ac	420'	0.48 ac	10,572'	6.31 ac
Totals	23,673'	13.59 ac	20,924'	24.02 ac	44,597'	37.61 ac

As a consequence, the lengths and disturbance figures presented for the twelve inch line do not reflect any surface disturbance for this particular 3,838 feet of pipeline - these disturbance numbers are reflected for the ten inch discharge line only.

2.1.6 Workover Operations

Workovers are necessary to correct downhole problems in a producing well in order to return the well to production. Workovers are not done on a set schedule but rather on an as-needed basis, and are undertaken to increase or maintain production from the current producing zone(s) downhole; recomplete in a new zone; lower operating costs by reducing water and/or sand production; or to return the well to its production objective by pulling and replacing leaking tubing. Workovers normally take five to seven days depending upon such factors as well depth and the problems to be corrected and would be scheduled to avoid conflicts with wintering wildlife to the extent possible.

Approximately once every three years, a well would require a workover for any of several reasons, including:

- changing or replacing old tubing;
- refracturing producing formation(s) using advanced techniques designed to stimulate additional production;
- cleaning out the well bore and perforations to stimulate/facilitate production; and
- possibly “recompleting” in another potentially productive zone which was not originally completed at the time the well was drilled.

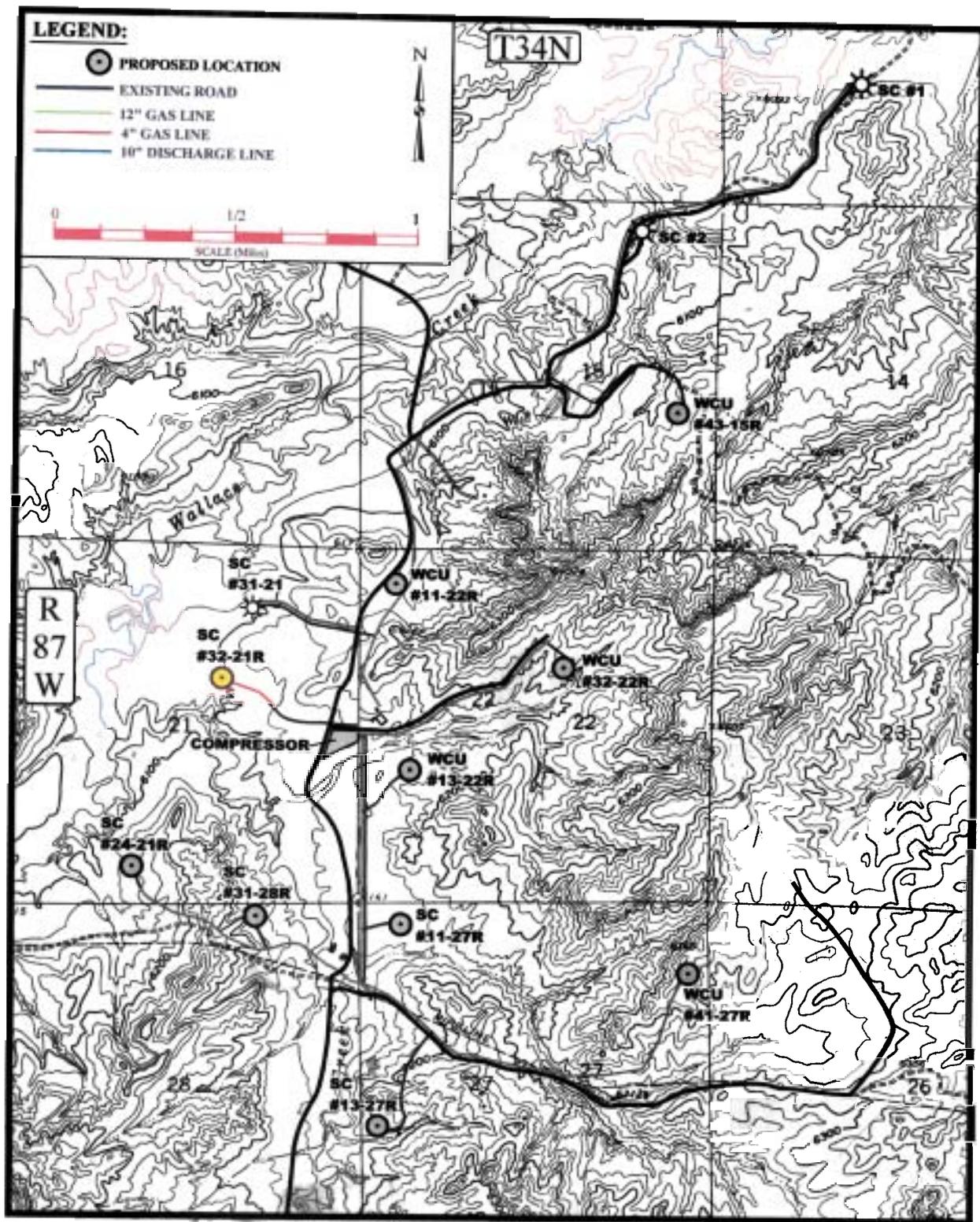


Figure 2.3: Proposed Wallace Creek Gas Gathering System

2.1.7 Abandonment and Reclamation

Abandoned well pads, roads, or other disturbed areas would be restored to as near the original condition as possible. This would include revegetation of the disturbed areas to the specifications of the BLM or private landowner as specified in the approved APD. All disturbed surfaces would be recontoured to the approximate natural contours, with reclamation of the well pad and access road performed as soon as practical after final abandonment. Reseeding of these reclaimed areas would be undertaken as soon as practical following the completion of the reclamation activities. Reseeding is typically performed in the spring after the ground thaws and before May 15th or in the fall after September 1st and prior to ground frost in order to take full advantage of moisture patterns in central Wyoming.

A crew of ten workers for five days would be required to clean up and reclaim the wellpad.

2.1.8 Produced Water Disposal

Produced water would be disposed of by injection into an existing water injection well owned and operated by BBC: Cooper Reservoir Unit #1 located in the SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 3, T35N, R87W. Produced water would be injected into the Fort Union Formation at an approximate depth of 4,800 feet. Water production from the ten Raderville wells is expected to be less than ten barrels per day. The produced water would be transported via tank truck over existing roads from the expanded compressor facility to the water injection well (and associated facilities) in the Cooper Reservoir Unit.

2.1.9 Hazardous Materials

BBC would maintain files containing current *Material Safety Data Sheets* (MSDS) for all chemicals, compounds, and/or substances that would be used during the course of construction, drilling, completion, and production operations. BBC has reviewed the EPA's *Consolidated List of Chemicals Subject to Reporting Under Title III of the Superfund Amendments and Reauthorization Act of 1986* (SARA), as amended, to identify any hazardous substances proposed for use in this project, as well as the EPA's *List of Extremely Hazardous Substances* as defined in 40 C.F.R. 355, as amended.

BBC and their contractors would comply with all applicable federal laws and regulations existing or hereafter enacted or promulgated. BBC and their contractors would locate, handle, and store hazardous substances in an appropriate manner that prevents them from contaminating soil and water resources or otherwise sensitive environments. Any release of hazardous substances (leaks, spills, etc.) in excess of the reportable quantity as established by 40 CFR Part 117 would be reported as required by the *Comprehensive Environmental Response*,

Compensation, and Liability Act of 1980 (CERCLA), as amended. If the release of a hazardous substance in a reportable quantity would occur, a copy of a report would be furnished to the BLM Hazmat Coordinator and all other appropriate federal and state agencies.

2.1.10 Field Camps

No field (man) camps are proposed for the proposed Raderville project. Personnel would commute to the project site daily, most likely from the Casper area. Self-contained trailers may be sited temporarily on the well locations to house key personnel during drilling operations (see Section 2.1.1).

2.1.11 Applicant-Committed Practices

The following is a brief description of various applicant-committed environmental practices that would be implemented in this project.

2.1.11.1 Disposal of Sewage, Garbage, and Other Waste Material

Portable self-contained chemical toilets would be provided for human waste disposal. Upon completion of operations, or as required, toilet holding tanks would be pumped and their contents disposed of at an approved sewage facility in accordance with applicable rules and regulations regarding sewage treatment and disposal.

All garbage and nonflammable waste materials would be collected in self-contained portable dumpsters or trash cages, and, upon completion of operations or as needed, the accumulated trash would be hauled off-site to an approved sanitary landfill. No trash would be placed in the reserve pit.

As soon as practical after removal of the drilling rig, all debris and other waste materials not contained in the trash cage would be cleaned up, removed from the well location, and disposed of in an approved landfill. No potentially harmful materials or substances would be left on location.

2.1.11.2 Cultural Resources

A Class III cultural resource inventory would be conducted by a qualified archaeologist on all areas proposed for surface disturbance. If any cultural resources are identified during these Class

III surveys, avoidance or appropriate mitigation would be accomplished in consultation with the State Historic Preservation Office (SHPO) and BLM.

If, during operations, any archaeological or historic materials or any objects of antiquity would be discovered, all operations which would affect such sites would be suspended and the discovery reported promptly to the BLM's Authorized Officer (AO). Operations would not resume until written authorization to proceed is issued by the AO. Within five working days, the AO would evaluate the discovery and inform BBC of actions that would be necessary to prevent loss of significant cultural or scientific values. BBC would be responsible for the cost of any mitigation required by the AO. The BLM and SHPO would formulate stipulations and procedural guidelines for the conduct of mitigation. Upon verification from the BLM and SHPO that the required mitigation has been completed, operations would be allowed to resume.

All project personnel would be prohibited from collecting artifacts and from disturbing any cultural resources in the area. BBC would be responsible for all persons associated with this project.

2.1.11.3 Invasive Non-Native Plant Species (Noxious Weeds)

BBC would control invasive plant species along road and pipeline ROWs, wellpads, and other applicable facilities, as well as on areas where these species originate on the ROW and invade adjacent areas. A list of invasive plant species would be obtained from the BLM or Natrona County. On lands administered by the BLM, an approved Pesticide Use Proposal would be obtained before the application of herbicides or other pesticides for the control of these invasive plant species.

2.1.11.4 Road Maintenance

The Operator would maintain roads in a safe, usable condition. A regular maintenance program shall include, but not be limited to, blading, ditching, culvert installation, drainage installation, surfacing, and cattleguards, as needed. Design, construction, and maintenance of the road would be in compliance with the standards contained in BLM Manual, Section 9113 (Roads), and in the joint BLM/USFS publication: *Oil and Gas Surface Operating Standards for Oil and Gas Exploration and Development, Third Edition*.

2.1.11.5 Wildlife

BBC would conduct a raptor nesting inventory of the project area and report the results thereof to the BLM.

2.2 THE NO ACTION ALTERNATIVE

Under the No Action Alternative, the Proposed Action would not be implemented. Current land use practices would continue, and the EA area could continue to be available for oil and gas development. Should future development be proposed, those actions would require individual NEPA analyses on a case-by-case basis.