To: Suchomel, Bruce[Suchomel.Bruce@epa.gov]
Cc: Nicole Colby[ncolby@pgei.com]
From: Mike Hackney
Sent: Tue 8/2/2016 2:20:35 AM
Subject: RE: Petroglyph Operating Arch. info

From the Abstract of the CRI

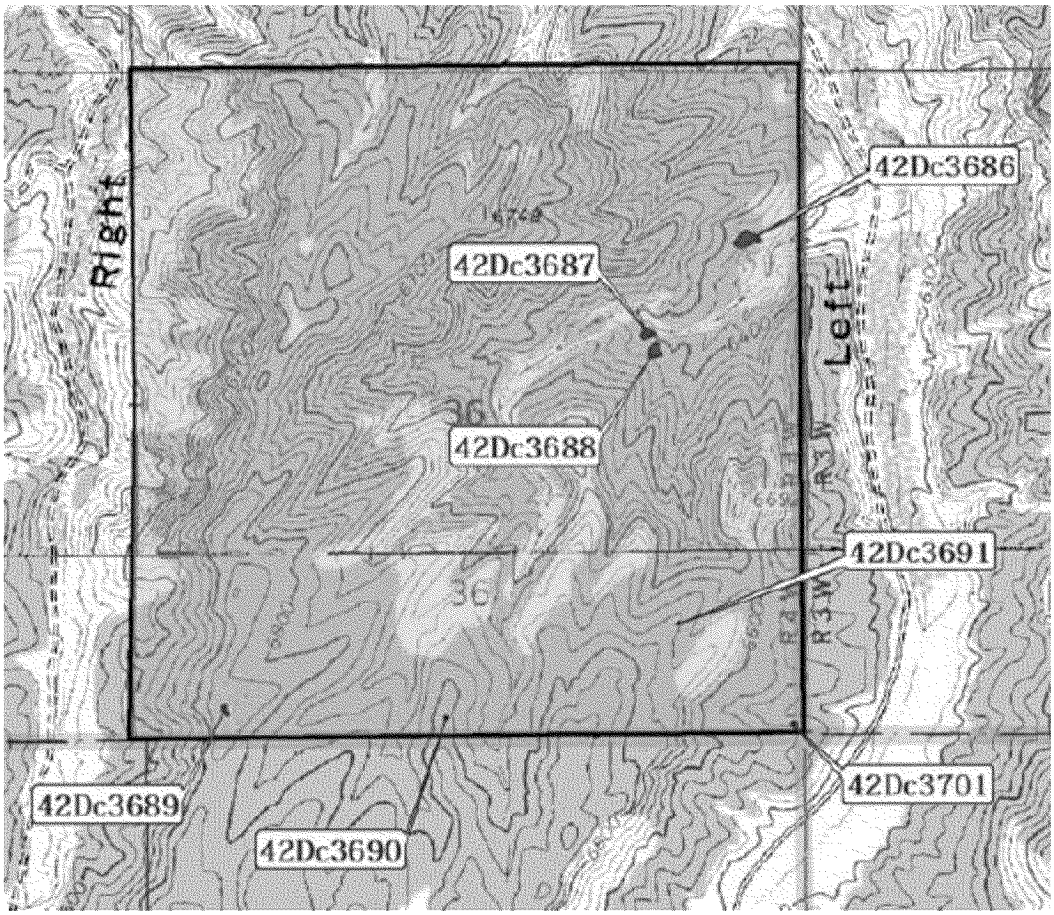
In conclusion, the cultural resource inventory of Petroglyph Operating Company's block parcel in Township 5 South, Range 4 West, Section 36 resulted in the documentation of seven archaeological sites (42Dc3686, 42Dc3687, 42Dc3688, 42Dc3689, 42Dc3690, 42Dc3691, and 42Dc3701). Four prehistoric sites (42Dc3686, 42Dc3687, 42Dc3689, and 42Dc3691) are recommended eligible to the NRHP.

I would take that to mean that 4 blobs on the map represent the 4 prehistoric sites eligible for NRHP, but there are actually 5 "avoid" sites as explained below in (3).

As to the previous questions:

2. 42Dc3686 and the like are Smithsonian Trinomial Site designations and standard in this line of work. 42 is the state code for Utah, Dc is the county code for Duchesne County, and last four digits a serial number. These are issued by Utah SHPO when you turn the sites in to them, in a system similar to how API numbers for oil wells are issued by DOGM in Utah.

3. Here's the map from the CRI showing all the blobs (without buffers). All seven blobs are indicated.



Conclusion from CRI:

CONCLUSION AND RECOMMENDATIONS

The cultural resource inventory of Petroglyph Operating Company's block parcel in Township 5 South, Range 4 West, Section 36 resulted in the documentation of seven archaeological sites (42Dc3686, 42Dc3687, 42Dc3688, 42Dc3689, 42Dc3690, 42Dc3691, and 42Dc3701). Four prehistoric sites (42Dc3686, 42Dc3687, 42Dc3689, and 42Dc3691) are recommended eligible to the NRHP. In accordance with Ute Tribal protocol all these sites including an ineligible surface quarry (42Dc3701) require avoidance from future ground disturbing undertakings. Based on adherence to the avoidance recommendation, a determination of "no

historic properties affected" is proposed for the project pursuant to 36 CFR 800.

I don't think you are reading the sentence in red as was intended. What it is saying is Tribal protocol requires that all sites eligible for the NRHP are to be avoided, but ALSO Native American sites that may not meet the standards of a NRHP designation. The …3701 site is such a site as described in in the CRI. So there are 5 sites that we are to avoid (and I count 5 blobs in section 36 on the map I forwarded). The other two sites are of European-American origin.

As far as the avoidance procedure…

1. All of these sites have been turned into Utah SHPO; they will come up for anyone doing an Arch search in the future.

2. An EPA UIC permit does not grant the permittee permission to disturb surface.

3. Permission to disturb for a pipeline or road comes from BIA and the Tribe (and in the case of a new wellsite APD, BLM also)

4. BIA and the Tribe are not going to approve a disturbance that impacts endangered species, critical wildlife habitat, paleo resources, or in this case, cultural resources

5. As I mentioned before, every one of our employees is subject to arrest for leaving an approved road, wellpad, or right-of-way

Beyond that, I don't know what would be expected for an avoidance plan. What am I missing? Flagging them or fencing them would only draw more attention to them from looters.

If your question is about the …3686 site that appears to straddle the road to the 36-08E4.

First I will point out a few ideas on that area:

1. The maps provided are not intended to be precise locator maps to keep the public away from relic hunting

2. The road dates from 1998 and predates the CRI by 16 years

3. An Archeological survey was prepared in 1997 (as mentioned in the CRI you have)

4. The site in question consists of some sharpened rocks. It's entirely possible that the 1997 Arch survey simply missed it.

5. If the road actually does go through an Arch site, there's nothing that can be done about that now.

How we would avoid that area would be up to BIA and Tribal specialists. They could:

1. Allow the pipeline to be buried on the uphill side of the road because the cultural site isn't really where shown

2. Allow the pipeline to be buried in the middle of the road near the site since that would result in no new disturbance, but likely only if doing so would not cause erosion in the road.

3. Allow a pipeline to be placed cross-country away from the road and arch sites

4. Deny the pipeline right-of-way

I seem to be unclear on what I need to tell you to help you accomplish whatever it is you're trying to do. Perhaps a phone call would help us get on the same page?

Mike

From: Suchomel, Bruce [mailto:Suchomel.Bruce@epa.gov]
Sent: Monday, August 01, 2016 2:56 PM
To: Mike Hackney <mhackney@pgei.com>
Subject: RE: Petroglyph Operating Arch. info

Great map, Mike – thanks.

I'll still need 2 and 3 below – as we have strict consultation procedures. Also, the map shows four blobs, but seven areas are mentioned in the CRI. Is it possible that some blobs cover more than one CR?

If so, which ones and how many CRs per blob?

~~1. Tribal map showing the "blobs" you mention below.~~

2. Who's designation is the documented archaeological sites, i.e., 42Dc3686?

3. What's the method of avoidance conveyed to the operator from the CRI? How will the operator actually avoid these sites?

Bruce Suchomel
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From: Mike Hackney [mailto:mhackney@pgei.com]
Sent: Monday, August 01, 2016 2:33 PM
To: Suchomel, Bruce <Suchomel.Bruce@epa.gov>
Subject: FW: Petroglyph Operating Arch. info

From: Ed Trotter [mailto:edtrotter@easilink.com]
Sent: Friday, September 26, 2014 8:26 AM
To: Nicole Colby <ncolby@pgei.com>
Cc: Paul Powell <ppowell@pgei.com>; Jessie Graham <jgraham@pgei.com>; Mike Hackney <mhackney@pgei.com>; Beau Judge <bjudge@pgei.com>; Lester Farnsworth <lfarnsworth@pgei.com>; Rodrigo Jurado <rjurado@pgei.com>; Ken Smith <ksmith@pgei.com>
Subject: FW: Petroglyph Operating Arch. info

Nicole,

See attached map of Arc sites.

Thanks,

Ed

Ed Trotter

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From: Adam Thomas [mailto:AThomas@montarch.com]
Sent: Friday, September 26, 2014 8:17 AM
To: Brandon Bowthorpe
Cc: John Floyd; Ed Trotter
Subject: FW: Petroglyph Operating Arch. info

Good afternoon Gentlemen,

Attached is a pdf of 6 of our completed sections. Unfortunately because they are tribal surface, I am unable to pass along shape files; however if you need a different scale map for accuracy, please let me know. From the plats received from Ed the other day, it looks like there is going to be a conflict for the 36-01 pipeline that will need to be moved prior to a class I submittal.

Ed, when you have a chance, can you send me the shapefiles associated with the plats for all of the locations with Class I issues that you mentioned the other day

Blue polygons are arch. sites that do not need to be avoided at this time. The red circles around specific arch. sites indicate required cultural avoidance. This is a 100 ft. avoidance.

If you have any questions, please let me know, and I will continue to provide updates as we progress.

Please note Map Scale = 1:16000.

K. Adam Thomas

GIS Specialist

Montgomery Archaeological Consultants, Inc

435.259.5764

athomas@montarch.com

From: Adam Thomas
Sent: Monday, August 04, 2014 5:07 PM
To: 'Brandon Bowthorpe'
Cc: Keith Montgomery; John Floyd; Levi Mecham; Ed Trotter
Subject: RE: Petroglyph Operating Arch. info

Gentlemen,

Here are the items you requested for the initial blocks done earlier this year. I will be sending our most recent completion shortly and will put together additional information as it is completed.

Included in this data set are

1. a .pdf showing our block inventory near Duchesne with associated sites. Sites with a red ring around them are eligible and need to be avoided by a minimum of 100 ft.

2. _*14*_*xxx*_Blocks.shp – Completed Cultural Inventory Survey

3. _*14*_*xxx*_*Block*_Sites – Archaeological sites documented within survey area

4. _*14*_*xxx*_*Block*_*Sites*_Buffer – 100 ft. avoidance buffer of sensitive cultural areas

Please let me know if there is anything else I can put together to assist you all in further work.

Thanks and have a great day.

K. Adam Thomas

GIS Specialist

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From: Brandon Bowthorpe [mailto:bbowthorpe@uintahgroup.com]

Sent: Monday, August 04, 2014 12:10 PM
To: Adam Thomas
Cc: Keith Montgomery; John Floyd; Levi Mecham; Ed Trotter
Subject: Petroglypgh Operating Arch. info

Adam,

I just had a conversation with Keith concerning the ongoing project for Petroglyph, Keith requested that I contact you and have you send us some maps and .shp files.

Can you please send any maps and or .shp files that you might have that could be beneficial to the project to myself, John Floyd, and Levi Mecham?

If we run into anything in the field that looks like it might be an issue, we will contact you and have you come to the field flag the areas for us.

Thanks,

--

Brandon Bowthorpe, PLS

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