

UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management
Pinedale Field Office
1625 West Pine
Pinedale, 82941

Decision Record
Dry Piney Helium and Carbon Sequestration Project
DOI-BLM-WY-D010-2025-0046-EA
December 2025

1. Decision:

The Bureau of Land Management (BLM) Pinedale Field Office (PFO) has selected the Proposed Action as described in the Dry Piney Helium and Carbon Sequestration Project Environmental Assessment (DOI-BLM-WY-D010-2025-0046-EA). This decision authorizes Blue Spruce Operating LLC's (BSO's) Proposed Action on BLM-administered public lands, to extract helium and natural gas from federal mineral leases and to sequester carbon dioxide (CO₂) and hydrogen sulfide (H₂S) in deep geologic formations.

Specifically, the BLM is approving:

- **Twelve rights-of-way (ROW) grants** for buried pipelines and road use on BLM-managed lands;
- **Seven Applications for Permit to Drill (APDs)** for wells accessing federal minerals;
- **Use and enhancement of existing BLM-managed roads** to support project access and logistics.

The proposed project is located approximately 10 miles northwest of La Barge, Wyoming, within and adjacent to the Dry Piney Unit in Sublette County. The selected alternative includes two pipeline corridors using new and existing surface disturbance: the Gas Gathering and Utility Corridor and the Residue Gas and Acid-Gas Injection (AGI) Corridor. These corridors will transport raw gas, utilities, and waste streams between well pads and a central processing facility. No new roads will be constructed; instead, existing roads will be improved to accommodate construction and operational traffic.

The purpose of the proposed project is to support the responsible development of federal helium and natural gas resources while permanently sequestering CO₂ and H₂S waste streams. The proposed project aligns with the BLM's multiple-use mandate and supports national energy and climate goals.

The BLM's decision is based on a thorough analysis of environmental impacts, public input, and interagency coordination. The EA evaluated both the Proposed Action and a No Action Alternative. The No Action Alternative would have resulted in development entirely on private and state lands, avoiding BLM-managed lands but also forgoing federal mineral production and associated public benefits.

The selected alternative incorporates extensive environmental protection measures (see EA Table 2-2), including:

- Seasonal timing restrictions to protect mule deer winter range (November 15–April 30);
- Reclamation of disturbed areas using BLM-approved seed mixes and erosion control;
- Implementation of a Hydrogen Sulfide Public Protection Plan (HSPPP) to safeguard public health and safety;
- Cultural resource avoidance and construction monitoring;
- Air quality controls and dust abatement measures.

Note on Federal Pore Space Use:

The BLM will require a separate right-of-way (ROW) grant for use of BLM-administered federal pore space associated with injection of CO₂ in the vicinity of the proposed Class II Underground Injection Control disposal wells. BSO must obtain a pore space ROW grant before using or occupying BLM-administered federal pore space, which will be assured through a Notice to Proceed (NTP) stipulation as a condition of the AGI pipeline ROW grant.

The BLM has determined, through a signed FONSI that the Proposed Action will not result in significant impacts to the human environment. Therefore, an Environmental Impact Statement (EIS) is not required.

This decision supports the responsible development of strategic resources, enhances domestic helium supply, and contributes to long-term carbon management through geologic sequestration. It also provides economic benefits to Sublette County and the State of Wyoming through employment, local spending, and public revenue from mineral royalties and taxes.

2. Compliance and Conformance:

This decision conforms with the:

Record of Decision and Approved Pinedale Resource Management Plan (RMP); including the Approved Resource Management Plan Amendments (ARMPA) for the Rocky Mountain Region (approved September 21, 2015).

The Proposed Action supports the following goals and objectives from the Record of Decision and Approved Pinedale Resource Management Plan, PFO, Pinedale, Wyoming, as amended. Approved: November 26, 2008 (RMP).

- Lands and Realty Management Goal: Provide for use of public lands in accordance with federal regulations compatible with other resources.
- Lands and Realty Objective: Respond to community needs for expansion and economic development and process ROW applications in a timely manner, applying appropriate mitigation to protect resource values.
- Mineral and Energy Resources Goal: Provide opportunities for mineral exploration and development under the mining and mineral leasing laws, subject to legal requirements to protect other resource values and land uses.
- Objective: Consolidate oil and gas exploration and leasing to already intensively developed fields, minimizing impacts to other resource values and land uses.

The proposed project area includes land designated as Intensively Developed Fields and Traditional Leasing Areas. The Proposed Action was designed to comply with applicable lease stipulations, including no surface occupancy (NSO), controlled surface use (CSU), and timing limitations (EA Section 1.2).

Compliance with Federal Laws and Regulations

The decision complies with the following federal laws and regulations:

- National Environmental Policy Act (NEPA) – The EA (DOI-BLM-WY-D010-2025-0046-EA) analyzed the potential environmental impacts of the Proposed Action and BLM determined, through a Finding of No Significant Impact (FONSI), that an Environmental Impact Statement is not required.
- Federal Land Policy and Management Act (FLPMA) – The ROW grants are issued under 43 CFR Part 2800, consistent with FLPMA's multiple-use and sustained yield mandate.
- Mineral Leasing Act (MLA) – The APDs are authorized under 43 CFR Part 3160, in accordance with the MLA, and oil & gas pipelines are authorized under 43 CFR Part 2880.
- Clean Air Act, Clean Water Act, Endangered Species Act, and National Historic Preservation Act – The proposed project complies with applicable provisions of these laws, including required consultations and permits (EA Table 1-2).

Permits and Consultations

As outlined in EA Table 1-2, the following permits and approvals are required and will be obtained prior to construction:

- ROW grants and Temporary Use Permits (TUPs) under 43 CFR Part 2800 and 43 CFR Part 2880;
- APDs under 43 CFR Part 3160;
- Cultural and paleontological resource compliance, including Class III surveys and coordination with the Wyoming State Historic Preservation Office;
- Endangered Species Act consultation with the U.S. Fish and Wildlife Service;
- Air and water quality permits from the Wyoming Department of Environmental Quality;
- Stormwater Pollution Prevention Plan (SWPPP) and other construction-related authorizations;
- Coordination with cooperating agencies and Tribes, as documented in EA Section 4.

All applicable mitigation measures and conditions of approval will be incorporated into the ROW grants and APDs to ensure compliance with these requirements.

3. Public Involvement:

The BLM PFO conducted public and agency outreach in accordance with the NEPA and BLM policy. Public involvement was integral to the development of the Environmental Assessment (EA) and informed the analysis of potential impacts and the selection of the Proposed Action.

Scoping and Public Comment

- A formal public scoping notice and press release were issued on March 7, 2025, initiating a 15-day public comment period that closed on March 22, 2025 (EA Section 1.4.1).
- A public scoping meeting was held on March 11, 2025, in Big Piney, Wyoming, and was attended by 22 members of the public.
- The BLM received 26 public comment submissions during the scoping period. Comments addressed a range of issues, including:
 - Impacts to mule deer and crucial winter range,
 - Air quality and greenhouse gas emissions,
 - Public health and safety related to hydrogen sulfide (H₂S),
 - Cultural resources,
 - Economic benefits and energy security.

All public comments were reviewed and considered in the development of the EA. A summary of comments and responses is included in Appendix A of the EA.

Key Issues Raised and Addressed

The following issues were identified through public and agency input and analyzed in detail in the EA (EA Section 1.4.2):

- Air Quality and Greenhouse Gas (GHG) Emissions (EA Section 3.3)
- Cultural Resources (EA Section 3.4)
- Traffic and Transportation (EA Section 3.5)
- Mule Deer Habitat and Use (EA Section 3.6)
- Socioeconomic Impacts (EA Section 3.7)
- Public Health and Safety – H₂S Infrastructure (EA Section 3.8)

These issues informed the development of mitigation measures and design features incorporated into the Proposed Action (EA Table 2-2).

Agency and Tribal Coordination

The BLM invited the following agencies to participate as cooperating agencies (EA Section 4). The cooperating agencies participated in the NEPA process by contributing technical expertise, reviewing draft documents, and providing input on issues within its jurisdiction, including soil, water, vegetation, and wildlife resources. A cooperating agency meeting was held on April 29, 2025, with several updates and review periods throughout the project lifespan, to facilitate coordination and ensure early and meaningful involvement. This collaboration supported the development of a thorough and informed Environmental Assessment.

Sublette County
Lincoln County
Sublette County Conservation District
Wyoming Game and Fish Department
Wyoming Department of Environmental Quality
Wyoming Oil and Gas Conservation Commission

Wyoming State Engineer's Office
Town of La Barge

The BLM PFO initiated tribal consultation for the BSO's Dry Piney Helium and Carbon Sequestration Project by sending letters on March 3, 2025, to the leadership and Tribal Historic Preservation Officers (THPOs) of interested tribes. Follow-up emails were sent on March 12 and 19, 2025.

The Northern Arapaho Tribe responded, requesting a site visit and tribal monitoring for all eligible cultural sites potentially impacted by the project. In response, BLM coordinated with the project's environmental consultants and the operator to avoid all eligible sites. In August 2025, the project was rerouted to ensure complete avoidance of these sites. Subsequent outreach efforts included follow-up calls and emails.

In October 2025, the BLM PFO concurred with the Wyoming State Office Tribal Liaison that the outreach conducted for this project constituted a good faith effort and was consistent with applicable laws, regulations, and policy.

Tribes contacted for consultation included:

Eastern Shoshone Tribe
Northern Arapaho Tribe
Shoshone-Bannock Tribes
Ute Tribe of the Uintah and Ouray Reservation
Blackfeet Nation
Fort Belknap Indian Community
Comanche Nation
Crow Creek Sioux Tribe

4. Rationale for Decision

The BLM has selected the Proposed Action for the Dry Piney Helium and Carbon Sequestration Project because it best meets the purpose and need for the proposed project, complies with applicable laws and policies, and supports the BLM's multiple-use mandate. The decision authorizes BSO's Proposed Action on BLM-administered public lands, to extract helium and natural gas from federal mineral leases and to sequester CO₂ and H₂S in deep geologic formations.

Purpose and Need

As described in EA Section 1.1, the purpose of the proposed project is for the BLM to respond to BSO's applications for ROWs and APDs to access federal minerals. The need for the action is established by the BLM's responsibility under the FLPMA and the MLA to manage oil and gas operations on federal lands and ensure compliance with applicable laws and regulations.

Selected Action and Components

Under this decision, the BLM will authorize:

- 12 ROW grants for pipelines and road use on BLM-managed lands;

- 7 APDs for wells accessing federal minerals;
- Use and enhancement of existing BLM-managed roads.

The proposed project includes two pipeline corridors (Gas Gathering and Utility Corridor, and Residue Gas and AGI Corridor), directional drilling from private and state lands, and implementation of environmental protection measures (EA Table 2-2). The proposed project area is located approximately 10 miles northwest of La Barge, Wyoming, within and adjacent to the Dry Piney Unit in Sublette County.

Why the Proposed Action Was Selected

The Proposed Action was selected over the No Action Alternative because it:

- Meets the proposed project's purpose and need by enabling the development of federal mineral resources;
- Supports national energy goals by increasing domestic helium supply and permanently sequestering CO₂ and H₂S;
- Minimizes environmental impacts through design features, timing restrictions, and reclamation measures;
- Provides economic benefits to Sublette County and the State of Wyoming through employment, local spending, and public revenue from mineral royalties and taxes.

The No Action Alternative would have resulted in development entirely on private and state lands, avoiding BLM-managed lands but also forgoing federal mineral production and associated public benefits. It would not have met the BLM's legal obligations under FLPMA and the MLA.

Key Issues and Trade-Offs

The EA analyzed several key issues that influenced the decision (EA Section 1.4.2):

- **Wildlife:** The proposed project overlaps mule deer crucial winter range. Construction will avoid the November 15–April 30 period, and reclamation will restore habitat post-construction (EA Section 3.6).
- **Air Quality and GHG Emissions:** Emissions are below regulatory thresholds and offset by CO₂ sequestration (EA Section 3.3).
- **Cultural Resources:** All eligible sites will be avoided, and construction monitoring will be implemented (EA Section 3.4).
- **Public Safety:** The HSPPP ensures compliance with OSHA and BLM standards (EA Section 3.8).
- **Socioeconomics:** The proposed project will generate short-term employment and long-term tax revenue, with minimal impacts to housing or public services (EA Section 3.7).

Public and Resource Benefits

The proposed project will:

- Increase domestic production of helium, a critical and strategic resource;
- Support carbon management through permanent CO₂ sequestration;

- Generate revenue for local and state governments.
- Improve infrastructure through road enhancements;
- Support public land stewardship through reclamation and mitigation measures.

FONSI

The BLM issued a FONSI for this proposed project, concluding that the Proposed Action does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) is not required.

5. Right of Protest and/or Appeal:

In accordance with 43 CFR 3165.3, any adversely affected party contesting this decision may request an administrative review, before the State Director, either with or without oral presentation. Such request, including all supporting documentation, must be submitted in writing within 20 business days of the date such notice of violation or assessment or instruction, order, or decision was received, or considered to have been received, by the Wyoming State Director, Bureau of Land Management, P.O. Box 1828, Cheyenne, Wyoming 82003. This decision will remain in effect while the State Director Review is pending unless a stay is granted by the State Director. BLM will accept a request for State Director review that has been submitted by U. S. mail only.

This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of Hearings and Appeals, in accordance with the regulations contained in 43 CFR Part 4. The notice of appeal must be filed no later than 30 days after the date of receiving notice of this decision. Any notice of appeal must be filed with the IBLA and must include a copy of the decision being appealed, a statement of standing, and a statement of timeliness.

If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the IBLA, the petition for a stay must show sufficient justification based on the criteria at 43 CFR § 4.405(b).

You must serve a copy of the notice of appeal and any accompanying documents on the office of the officer who made the decision, each person or entity named in the decision, and the appropriate Office of the Solicitor at the time of filing with the IBLA. (see 43 CFR §§ 4.403(b); 4.407(b)). You must serve the Office of the Solicitor at the address shown on Form 1842-1. Service on a party known to be represented by an attorney or other designated representative must be made on the representative. If a statement of reasons for the appeal is not included with the notice of appeal, it must be filed within 30 days after the administrative record for the decision on appeal is filed with the IBLA. Failure to file a statement of reasons within the time required will subject the challenged decision to summary affirmance (see 43 CFR § 4.412(a)).

Stewart F. Cogswell
Pinedale Field Manager

Date