

Use and Application of Program Element MW

(Conduct Fluid Mineral Surface and Environmental Monitoring)

Purpose: To provide clarification and additional guidance in determining how to forecast, conduct, and account for accomplishments under the MW Program Element.

What is the Program Element MW?

- MW provides a means of tracking the number of visits to individual sites where monitoring activities occur. Oil, gas, and geothermal-related monitoring is conducted to assess actual or potential environmental impacts, determine whether the Bureau of Land Management's (BLM) standards are being met, and evaluate whether permit requirements are effective at achieving their desired intents. Site monitoring visits may be located off-lease or outside a unitized area, if necessary.
- The unit of accomplishment is "number of sites monitored."

What types of monitoring activities does MW address?

- MW site visits coded to Subactivities 1310 (Oil & Gas and Management), 9131 (Geothermal Management), 9141 (Permit Processing Improvement Fund (Pilot Offices)), or the NLCS 1711 (National Landscape Conservation System), in support of the oil, gas, and geothermal programs may be conducted prior to or during geophysical exploration operations or before, during, and after lease operations. They may include conducting **pre-disturbance vegetation surveys, revegetation surveys, disturbance and/or reclamation polygon surveys, wildlife surveys, habitat restoration surveys, air quality monitoring, information gathering to assess impacts to visual resources, produced water quality sample gathering, status of interim reclamation measurement, erosion/sedimentation monitoring, monumented & permanent photo points establishment or gathering, and any other information-gathering effort where tangible data that can be used to monitor impacts are collected.**

What is the purpose of oil, gas, and geothermal monitoring?

- Monitoring is typically used to identify baseline resource conditions, track changes or trends, determine whether the BLM's standards are being met, identify resource impacts, and evaluate whether permit requirements are effective at achieving their desired intents.

How is a Compliance Inspection (NB) accomplishment different from a Monitoring Site Visit (MW)?

- The two program elements do appear similar, but there are some important differences.
- The **NB** program element addresses compliance with the approved permit. (Did the operator do what they were required to do? (Such as, “Did the operator seed the disturbed areas as required in the approved Application for Permit to Drill (APD)?”))
- The **MW** program element is not warranted for permit compliance inspections, but rather for efforts where quantitative and/or qualitative monitoring data are collected. Data are collected for the purpose of assessing the environmental impacts of the approved permit and determining the success or failure of the permit requirements in achieving the desired result. (Such as conducting a Pace Transect to determine how well the planted vegetation is growing, whether it meets standards, and if not, why not.) If the data are subsequently used for compliance and enforcement, then you will also account for an NB inspection/compliance accomplishment in addition to an MW monitoring accomplishment. If the data collected during your MW site visit do not lead to any type of compliance and enforcement action, only an MW accomplishment would be recorded.

So, I can count a site inspection for NB (Conduct Fluid Mineral Inspection) and MW (Monitoring) at the same time?

- Monitoring may occur in conjunction with, or separate from, an NB inspection. In addition, data obtained from an MW site visit may be subsequently used to substantiate an enforcement action. So, yes, a field visit to a site may be counted as both an NB inspection and an MW site visit, as long as the field visit satisfies both program element requirements.

How do I keep track of an MW site visit?

- Develop and maintain a cuff record (such as a spreadsheet) that accounts for, at a minimum, the date of the visit, the location visited, and the personnel or resource specialty conducting the visit. Report MW accomplishments in the Performance Management Data System of the Management Information System (PMDS/MIS).

The MW program element guidance says that MW monitoring visits may be accomplished before an APD is approved. How can I monitor impacts before an action is even approved?

- In conducting a pre-approval review of an action (a Sundry Notice or an APD), the BLM may in some instances collect information that would serve as a baseline for assessing the impacts of future authorizations. This may include establishing monumented and permanent photo points, collecting quantified plant community data (density, cover, frequency, composition, etc.), gathering Global Positioning System (GPS) data for staked features, and the like. In these instances, each site visit would count as an MW accomplishment.

Should I forecast that I will accomplish an MW site visit for every onsite inspection I conduct?

- It is unlikely that quantitative and qualitative monitoring data will be obtained from each onsite inspection, so in most cases an MW accomplishment is unlikely at an onsite inspection. However, an MW accomplishment must be counted if, during the onsite inspection, the BLM personnel conduct a survey or effort to gather data that will be used in developing an inventory baseline (such as gathering wildlife habitat or use data, vegetation data, placing stream channel monitoring points, or something similar).

Who can conduct an MW site visit?

- The purpose of coding to MW is to track monitoring funding provided by Congress through the oil, gas, and geothermal programs and included in the oil, gas, and geothermal budgets to the field offices. Anyone who has workmonths funded from 1310, 1711, 9131, or 9141 can conduct an MW monitoring site visit in support of the oil, gas, and geothermal programs. (Monitoring site visits conducted by operators or their contractors cannot be reported under MW.) Most commonly, fluid minerals surface protection staff will account for MW site visits (Natural Resource Specialists, Surface Compliance Technicians, and Environmental Protection Specialists). Wildlife biologists, soil scientists, air resource specialists, and hydrologists are some of the other resource specialists that may also conduct MW site visits in support of the oil and gas program.

When I spend time conducting an MW site visit, do I code my time in Quicktime to 1310 MW?

- Yes. Time spent conducting MW monitoring site visits should also be entered into Quicktime.

The Program Element description for MW says that an example of an MW accomplishment is “internal quality control reviews (such as oversight inspections, technical procedural reviews, etc.)” How do I account for these types of activities when the unit of accomplishment is number of sites visited?

- You can report MW accomplishments if the internal quality control review involves field site visits.