



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Bakersfield Field Office  
35126 McMurtrey Avenue  
Bakersfield, CA 93308  
[www.blm.gov/office/bakersfield-field-office](http://www.blm.gov/office/bakersfield-field-office)

August 2, 2023

3100 (P)  
CALA088009  
CALA089047  
CALA087326  
CALA087463  
CALA087942  
CACA26793X  
LLCAC060.88

**CERTIFIED MAIL NO. 7021 1970 0001 6558 6455**  
**RETURN RECEIPT REQUESTED**

E&B Natural Resources Management Corporation  
1608 Norris Road  
Bakersfield, CA 93308  
Attn: Gary Richardson

Subject: CACA26793X Russell Ranch Unit Idle Wells - Federal Leases CALA088009,  
CALA089047, CALA087326, CALA087463, CALA087942

## **ORDER OF THE AUTHORIZED OFFICER**

Dear Mr. Richardson:

Please pay close attention to the requirements in this letter issued by the Authorized Officer. Our records indicate that E&B Natural Resources Management Corporation owns 100% of record title for federal leases CALA088009, CALA089047, CALA087326, CALA087463, and CALA087942, which are all committed to the Russell Ranch Unit CACA26793X.

The BLM Washington Office issued Instruction Memorandum No. 2020-006 (IM) on December 10, 2019. The IM was issued to ensure that federal idle wells are regularly reviewed by the BLM field offices and that appropriate steps are taken to timely reduce BLM's idle well inventory. Each field office is required to review their idle well inventory each year and issue orders requiring operators to demonstrate that these wells are still capable of producing oil and/or gas in paying quantities or submit plans to permanently plug and abandon the wells. In accordance with 43 CFR 3162.3-4, an operator shall promptly plug and abandon any well no longer capable of

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ARIZONA, CALIFORNIA, NEVADA, OREGON\*

\* PARTIAL

producing oil or gas in paying quantities, and reclaim disturbed surface lands, in accordance with a plan first approved in writing.

On November 9, 2021, E&B Natural Resources Management Corporation proposed an idle well elimination plan that aims to plug and abandon idle wells located within the Carrizo Plain National Monument. E&B Natural Resources Management Corporation’s proposal is hereby accepted subject to the following stipulations:

- 1) E&B Natural Resources Management Corporation is required to submit a Sundry Notice with “notice of intent to abandon” for all eleven (11) subject wells listed below.
- 2) E&B Natural Resources Management Corporation is required to plug and abandon all ten (11) subject wells within five (5) years from the date of completion of the Environmental Assessment(s) conducted under NEPA for the abandonment and/or reclamation of all eleven subject wells. All wells are subject to the reclamation standards that are listed in the environmental assessment: DOI-BLM-CA-C060-2023-0065-EA (See attached). **All eleven (11) subject wells must be plugged and abandoned by 8/2/2028.**

Lease	Well Name and No.	US Well Number
CALA089047	R.R.U. 44-25	0407900927
CALA089047	R.R.U. 43-25	0407900926
CALA087942	R.R.U. 111-25	0407900941
CALA087463	R.R.U. 46-25	0407900929
CALA087942	R.R.U. 922-25	0407901019
CALA088009	R.R.U. 77-23	0407901021
CALA087942	R.R.U. 11-25	0407901017
CALA087942	R.R.U. 21-25	0407901028
CALA089047	R.R.U. 32-25	0407900090
CALA087463	R.R.U. 35-25	0407900921
CALA087326	R.R.U. 54-25	0407900932

Note: The downhole abandonment for wells RRU 44-25, RRU 43-25, RRU 111-25, 922-25, and RRU 46-25 have been completed. Reclamation of these well sites is in progress.

E&B Natural Resources Management Corporation may request an extension of the time to achieve compliance from an applicable deadline with proper justification. BLM reserves the right to require changes or to cancel this agreement in its entirety if, for any reason in the opinion of BLM, the interests of the Government are not adequately protected.

**Failure to comply with the specifications of this Written Order in the future may result in the issuance of an Incident of Noncompliance and an assessment for continued noncompliance pursuant to 43 CFR 3163.1(a)(1) and 43 CFR 3163.1(a)(2). If you should**

**need additional time to comply with this order, please contact our office for authorization to avoid further compliance actions.**

You have the right to request a State Director Review of the provisions of this letter, pursuant to 43 CFR 3165.3(b) and if adversely affected by the State Director's decision, to appeal that decision to the Interior Board of Land Appeals (IBLA), pursuant to 43 CFR 3165.4(a). Your request should be filed with the BLM – California State Director within 20 business days of the date this notice is received by you or considered to have been received by you, pursuant to 43 CFR 3165.3(b). Should you fail to timely request a State Director Review or after receiving the State Director's decision fail to file an appeal timely, no further administrative review of the provisions of this letter will be possible. Request for State Director Review should be sent to:

California State Director  
Bureau of Land Management  
Branch of Energy, Mineral Science & Adjudication  
2800 Cottage Way, Suite W-1623  
Sacramento, California 95825  
Attn: Robert Sovil

If you have any questions concerning the requirements set forth in this letter, please contact Matt Thomas at (661) 337-9281 or email at [mjthomas@blm.gov](mailto:mjthomas@blm.gov).

Sincerely,

Gabriel Garcia  
Field Manager

Attachment: DOI-BLM-CA-C060-2023-0065-EA

**Reclamation Requirements from Environmental Assessment: DOI-BLM-CA-C060-2023-0065-EA**

**Well Number: RRU 35-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: rip and reseed with site specific seed mix developed by the BLM botanist, back to the junction with the East Road. Recontour by pulling the banks back onto the road and restoring natural drainages.

Well pad: Recontour by pulling banks in and shaping to natural contour of the adjacent ground and restoring natural drainages. Remove above ground pipeline. Rip, reseed pad and road with seed mix developed the BLM botanist once earthwork is complete, then install a fence (fence to be removed after reclamation is deemed successful by the BLM and a Final Abandonment Notice (FAN) is approved). Both fence installation and removal will be done by hand, usually a crew of 2 to 3 people. General cleanup of the well pad site as needed.

**Well Number: RRU 44-25**

Status: Downhole plugging and abandonment (P&A) complete, site reclamation has been initiated, but is not complete and has not been deemed successful by the BLM.

Road: This is a roadside well pad. The East Road will be reclaimed at the end of the 11 well P&A program.

Well Pad: Recontour by pulling the banks of the pad in to fill in low spots and restore natural drainages. The pad will be ripped and reseeded with site specific seed mix developed by the BLM botanist.

**Well Number: RRU 54-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: Road can be reclaimed back to the junction with the East Road. Pull side banks in and shape to natural contour of the adjacent ground and restore natural drainages.

Well Pad: Pull banks, recontour, and restore natural drainages. Rip, reseed the pad and road with site specific seed mix developed by the BLM botanist, then install a fence (fence to be removed after reclamation is successful), once earthwork is complete. General cleanup of the well pad site as needed.

**Well Number: RRU 43-25**

Status: Downhole Plugging and abandonment (P&A) complete, site reclamation has been initiated, but is not complete and has not been deemed successful by the BLM.

Road: Rip, recontour, restore natural drainages, and reseed with site specific seed mix developed by the BLM botanist back to the junction with the East Road.

Well Pad: Rip and recontour by pulling edges back onto pad. Restore natural drainages. Rip, reseed the pad and road once earthwork is complete, then install a fence (fence to be removed after reclamation is successful). General cleanup of the well pad site as needed. Leave habitat island on the northside of the pad.

**Well Number: RRU 32-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: Rip, recontour, and restore natural drainages by pulling edges in. Reclaim back to junction road to the southeast. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete.

Well Pad: Rip and remove asphalt from well site. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete. Remove all above ground pipelines. Remove cement slabs on the east side of the well pad.

**Well Number: RRU 21-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: Rip, reclaim, and reseed with site specific seed mix developed by the BLM botanist back to junction. Restore natural drainages. See map below.

Well Pad: Recontour and restore natural drainages by pulling bank from westside of pad. Reseed with site specific seed mix developed by the BLM botanist when earth work is complete. General cleanup of the well pad site. Remove above ground pipeline on the east side of the well pad.

**Well Number: RRU 922-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: This is a roadside well pad where the road will be needed for continued operations. No reclamation is needed at this time.

Well Pad: Rip and reseed the pad with site specific seed mix developed by the BLM botanist. No recontouring is needed. Pipe removal and general cleanup of the well pad site as needed.

**Well Number: RRU 11-25**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: Roadside well pad. Road is still in use. No reclamation at this time. The road will be left in place, as is. See map below.

Well Pad: Rip and recontour by pulling outside edge on Northside of the pad. Restore natural

drainages. Remove above ground pipeline and general cleanup of the well pad site. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete.

**Well Number: RRU 111-25**

Status: Downhole plugging and abandonment (P&A) complete, site reclamation has been initiated, but is not complete and has not been deemed successful by the BLM.

Road: Rip, reclaim, and recontour road with the adjacent ground back to junction (see map below). Restore natural drainages. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete.

Well Pad: Recontour by pulling dirt from the northside of the well pad to the south back to road junction (see map below). Shape to natural contour of the adjacent ground. Restore natural drainages. Remove concrete, remove above ground pipeline, and general cleanup of the well pad site. Remove old fencing east of the pad.

**Well Number: RRU 77-23**

Status: Idle; well to be plugged and abandoned (P&A) in compliance with all federal, state, and local guidelines.

Road: Rip and reclaim road back to the nearest active well pad (see map below). Recontour by pulling road edges in. Shape to natural contour of the adjacent ground. Restore natural drainages. Rip, reseed the pad and road with site specific seed mix developed by the BLM botanist once earthwork is complete, then install a fence (fence to be removed after reclamation is successful). General cleanup of the well pad site as needed.

Well Pad: Pull dirt from the Northside slope. Restore natural drainages. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete. Remove small tank setting near road junction (see map below).

**Well Number: RRU 46-25**

Status: Downhole plugging and abandonment (P&A) complete, site reclamation has been initiated, but is not complete and has not been deemed successful by the BLM.

Road: Rip, reclaim, and recontour road with the adjacent ground back to junction (see map below). Restore natural drainages. Reseed with site specific seed mix developed by the BLM botanist when earthwork is complete.

Well Pad: Recontour with the shape of the adjacent ground and restore natural drainages, block road as needed and seed with site specific seed mix developed by the BLM botanist. If needed, remove any debris on pad.

**“East Road”**

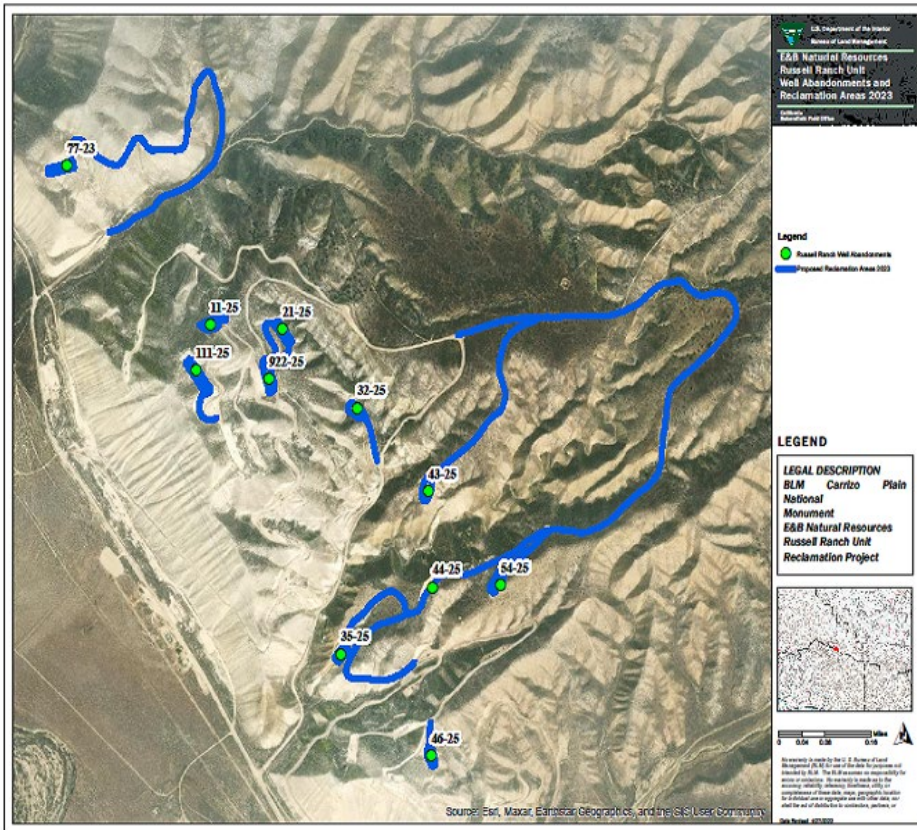
The East Road is an approximately 2.5-mile dirt road, between 10 and 12 feet wide. It will be ripped, reclaimed, and recontoured (see reclamation description above) with the adjacent ground back to junction (see map below). This work will be performed by a grader tractor (or similar)

with an attachment that will rip or break up compacted soil to prepare the surface to be reseeded. The road will be reseeded with site specific seed mix developed by the BLM botanist when earthwork is complete. Reseeding would occur after the compacted topsoil is broken up. The seed will be hand broadcasted into the ripped areas just before the rainy season starts, October/November. Seeding will occur no later than November 15 of the year construction ends at the location, or the vegetation restoration will be completed the following year. In areas where soils are to be compacted upon the completion of remediation activities, ripping or disking will occur prior to revegetation, preferably within three weeks of seeding. This process is intended to help with seed set as well as loosen up compacted soils for easier germination. A secondary seeding may be needed in locations not germinating properly. Since peak precipitation for San Luis Obispo County typically occurs from October 12 to April 30, seeding would be best implemented close to the November 15 deadline, in order to take advantage of the seasonal rainfall.

### **Pipelines and Powerlines**

Unneeded pipelines and power poles on the surface will be removed from the project area and well pad locations. Above ground pipelines will be removed by cutting a section of line from a disturbed surface and then pulling the pipeline using a crane to cut the pipeline into sections small enough to be hauled by a truck and trailer to an approved disposal site. All work will be performed using existing disturbed surfaces and no new surface disturbed will be needed to complete this task. Power poles will be removed using a crane. Power poles may need to be cut to haul via a truck and trailer to an approved disposal site. We are not aware of any buried pipelines that are outside of the existing disturbed wellsite areas. The lines that are buried beneath the well sites are short in length typically 20 feet or less and will be removed after the wells have been plugged. A backhoe will be used to dig up these lines. Lines will then be cut using a welding torch and small sections will be removed by a crane. These sections will be loaded onto a truck and trailer, then hauled to an approved disposal site.





## PRELIMINARY PALEONTOLOGICAL RESOURCE MONITORING AND MITIGATION PLAN (PRMMP)

The following plan is excerpted from PRIR 6000-2022-01P, a paleontological resource survey of the Russell Ranch leases completed prior to project implementation. Mitigation measures that meet federal requirements should be in place prior to the initiation of this Project. Below is a preliminary PRMMP that when implemented would reduce impacts to paleontological resources to a less than significant level:

- **Retain a Qualified Paleontologist approved by the BLM Bakersfield Field Office to oversee all paleontological mitigation.**
  - The Qualified Paleontologist must obtain a California BLM Paleontological Use Permit and a BLM Fieldwork Authorization approved by the Bakersfield Field Office, and a curation agreement with an accredited repository.
- **Prepare a PRMMP.**



- The PRMMP must be prepared by the Qualified Paleontologist and approved by the BLM Bakersfield Field Office a minimum of one week prior to the start of construction.
- **Conduct worker environmental awareness training prior to the commencement of ground disturbance.**
  - Verification of training will be provided to the BLM Bakersfield Field office in the form of a signature sheet.
- **Implement paleontological monitoring in areas of high paleontological sensitivity.**
  - All monitoring personnel will have a minimum of a bachelor's degree in geology, paleontology, or related field and must have sufficient field experience to demonstrate acceptable knowledge of fossil identification, collection methods, and paleontological techniques; and all work will be conducted under the direction of the Qualified Paleontologist. The Qualified Paleontologist will submit monitors' resumes to the BLM for approval prior to project initiation.
  - Specific locations and activities requiring monitoring, with supporting GIS maps, will be included in the PRMMP once a detailed Project description is available. Prior to development of the PRMMP, any ground disturbance that has the potential to impact paleontologically sensitive sediments should be monitored full-time by a paleontological monitor.
  - Excavating or drilling with an auger greater than 24 inches in diameter will be monitored full-time when PFYC 3, 4, or 5 units are expected to be impacted. In the Project area these units are older alluvium (PFYC 3); the Morales Formation (PFYC 3); the Santa Margarita Formation (PFYC 4); the White Rock Bluff Shale member of the Monterey Shale (PFYC 5); and the Branch Canyon Sandstone (PFYC 4). Should observed units appear to have a low potential to preserve paleontological resources, the Qualified Paleontologist may coordinate a reduction in monitoring with the BLM Bakersfield Field Office.
  - Monitoring of excavations determined to be entirely within young alluvium, surficial colluvium, and/or artificial fill (or previously disturbed sediments) is not recommended since any recovered resources would either not meet the age criteria to be considered fossils (BLM, 2016) and/or would lack original depositional stratigraphic context.
- **Implement procedures and recommendations for redirection of work should an unanticipated resource be located.**
  - The monitor will immediately notify the equipment operator and/or site project manager to stop work and mark the area with flagging until the discovery can be fully explored and evaluated.

- The paleontological monitor shall notify the construction manager and Qualified Paleontologist, who will in turn notify the BLM Bakersfield Field Office.
  - If a discovery is made by the crew when a paleontological monitor is not on-site, work will be temporarily halted within a 25-foot radius of the discovery until a paleontologist qualified under BLM standards has evaluated the find.
  - The Qualified Paleontologist, in consultation with the BLM Bakersfield Field Office, will assess the significance of the find and develop appropriate treatment measures.
  - Work may not resume in the discovery area until it has been authorized by the Qualified Paleontologist in consultation with the BLM Bakersfield Field Office.
- **Recover, prepare, and curate any significant paleontological resources.**
    - At each paleontological locality, data recorded will minimally include the field number, date of discovery, date of collection (if applicable), geographic coordinates, elevation, formation, stratigraphic provenance, lithologic description of sediment that produced the fossil(s), type(s) of fossils and types(s) of element(s), taphonomic and paleoenvironmental interpretations, associations with other fossils, photograph(s), and collector(s).
    - Matrix samples may be collected if there is evidence that significant vertebrate, invertebrate, plant, or trace microfossils may be present. These samples will be screen washed and picked in a paleontological laboratory.
      - The size of the sample should be based on the extent of the fossil-bearing horizon or deposit; however, per Society of Vertebrate Paleontology (SVP) guidelines (2010), the sample size shall not exceed 6,000 pounds.
    - All fossils and matrix samples must be properly labeled prior to removal from the locality where they were discovered.
    - All fossils will be prepared to the point of identification and curation, inventoried, and identified to taxon and element by a technical specialist, as necessary.
    - If significant paleontological resources are recovered, they will be curated at an accredited repository approved by the BLM Bakersfield Field Office, including curation-ready specimens, all data and reports, and curation fees.
  - **Prepare a final paleontological monitoring report, summarizing the results of the mitigation program implemented for the Project.**
    - A confidential paleontological monitoring report shall be prepared according to BLM specifications and submitted to the BLM Bakersfield Field Office. It will include at a minimum the dates of field work, results of monitoring, fossil

analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens.

- A non-confidential copy of the report shall be submitted to E&B Natural Resources Management once approval has been received from the BLM Bakersfield Field Office.

#### Avoidance and Mitigation Measures for E&B Natural Resources Russell Ranch Unit Well Abandonment Program:

- Project employees and contractors will receive formal training prior to working on the proposed action including attending a sensitive species education program developed by trained biologists, focusing on the protected and sensitive species that may occur at the different well pad locations. At a minimum, the education program will cover species distribution, identification characteristics, sensitivity to human activities, legal protection, penalties for violation of state and federal laws, reporting requirements, and project mitigation measures.
- Habitat disturbance will be minimized and conducted in a manner that reduces, as much as possible, the potential for take of individuals of a listed species. Existing roads and routes of travel will be used, the greatest extent practicable. Natural drainage patterns will be maintained to the greatest extent practicable.
- To the extent possible, Project activities will be conducted during daylight hours to minimize encounters with listed animals that are typically most active during nighttime hours.
- Vehicles will use existing and/or designated roads and avoid any cross-country travel.
- Vehicles must observe a 20-mph speed limit in and around Project sites.
- To prevent attracting wildlife to the Project areas, trash and food items will be kept in closed containers and removed daily.
- Firearms and pets will be prohibited within the boundaries of the Project areas.
- Dust control (use of water trucks) will be implemented during project activities (plugging of wells, recontouring of the pads/roads, ripping in preparation of seeding) that create a substantial amount of dust.
- Spills of hazardous materials shall be immediately cleaned up to prevent exposure to wildlife.

- Topsoil that can potentially or is known to support sensitive plant species should be stockpiled and redistributed over portions of work areas that will be temporarily disturbed, where applicable.
- A **pre-activity survey** for listed species must be conducted by a qualified biologist within thirty (30) days prior to any ground disturbing activities. Any listed species, their sign, or sensitive habitat features observed must be noted and clearly marked (i.e., burrows, dens, nests etc.).
- On-site biological monitoring will be performed during initial ground disturbing activities (Plugging of wells recontouring pads/roads and ripping in preparation of seeding) to ensure that sensitive species are not impacted.
- To prevent entrapment of animals, any trenches or pits created during project activities (Plugging of wells, recontouring pads/roads and ripping in preparation of seeding) more than 2 feet deep must be either covered at night or earthen or wooden escape ramps must be provided. Before work continues in these areas, trenches and pits must be inspected to ensure that no animals are present.

To minimize the inadvertent capture or entrapment of listed animals, the following additional measures will be implemented:

**San Joaquin kit fox.** If kit fox dens are observed and can be avoided, then exclusion zones will be established for each kit fox den. Potential kit fox dens will be avoided by 50 feet (15.24 meters), known kit fox dens will be avoided by 100 feet (30.48 meters) and non-active pupping dens will be avoided by 200 feet (60.96 meters). If an active natal den is observed, the BLM and USFWS will be contacted before any activities occur. If a kit fox den cannot be avoided during the project activities (Plugging of wells, recontouring pads/roads and ripping in preparation of seeding), the den will be monitored for three consecutive nights to ensure it is not occupied. After establishing the den is unoccupied, and only if a take authorization/permit from the Service has been established, it must be excavated and backfilled according to USFWS guidelines. However, if a kit fox is observed using a den, it will be monitored for five consecutive nights to confirm the fox leaves the den, and then the den will be excavated. The BLM and USFWS must be notified prior to any excavation activities.

**Nesting birds.** Prior to construction, a qualified biologist will conduct avian nest surveys within the Project site and surrounding areas. Surveys will be conducted during the appropriate time of the breeding season (typically March 1 through August 1). If any protected species are found nesting in these areas, consultation with the BLM and US Fish and Wildlife Service (USFWS) will be initiated to determine any effects on active nests and how to avoid them as well as establishing an appropriate buffer zone around active nests during the breeding season. Project activities (Plugging of wells, recontouring pads/roads and ripping in preparation of seeding) shall avoid disturbance to active raptor nests within or near the Project. For ground disturbing activities with mechanized equipment, no

pre-construction surveys for nesting raptors shall be required if work is to occur during the non-breeding season (September 1 through January 31). If, however, ground disturbing activities are scheduled to occur during the breeding season (February 1 through August 31), pre-construction surveys of potentially active nest sites within 200 feet (60.96 meters) of the project site shall be conducted in areas that may potentially have nesting raptors, including ground nesting raptor species such as the northern harrier. If surveys indicate that nests are inactive or potential habitat is unoccupied during the life of the project, no further mitigation shall be required.

**Burrowing owl.** Pre-construction surveys for burrowing owls will be conducted according to the March 2012 CDFW *Staff Report on Burrowing Owl Mitigation* guidelines. If owls and/or burrows can be avoided using buffer zones, then the appropriate buffer areas will be implemented. If avoidance measures cannot be adhered to for burrowing owls located within the Project site, exclusion and burrow closures will be implemented. These activities will occur after consultation and CDFW and BLM approval has been obtained and in accordance with the 2012 CDFW *Staff Report on Burrowing Owl Mitigation*.

**California condor.**

- A Service-approved biologist familiar with the species will brief employees, contractors, and other workers about the potential presence of the California condor. Briefings include prohibitions on approaching, harming, harassing, or otherwise intentionally disturbing California condors.
- A Service-approved biologist familiar with the species will review all activities for potential adverse effects on the California condor before they are implemented. If impacts are recognized, the Service-approved biologist will immediately contact the BLM and the Service to determine the feasibility, to minimize impacts by altering or moving the activity or rescheduling it.
- To the extent practicable, avoid work within 0.25 mile of active nests during the fledging period, which extends from August 15 through December 31.
- No work generating sound levels > 90 decibels will occur within 0.25 mile of a known active nest site during the nesting season (year-round), unless there is a landscape feature that attenuates sound.
- During plugging and reclamation operations, the project proponent will notify the Service to report the sighting of a condor along with any identification information observed, such as wing tag number and color.
- All work activities (Plugging of wells, recontouring pads/roads and ripping in preparation of seeding) will be monitored by Service-approved biologist familiar with California condor biology. If the Service-approved biologist determines that a risk to California condors exists, work will halt until the risk has been mitigated or eliminated.
- All trash and food items will be kept in closed containers and removed from the site daily. Construction debris will be carefully managed and disposed of to avoid creation of "microtrash" that could be consumed by California condors within the project area until the maintenance work is completed.
- Any tanks should be covered with a welded steel grate, or welded wire mesh secured to a frame to avoid drowning risk to condors.

**CULTURAL RESOURCES-** In the event of inadvertent discovery of cultural resources during project implementation, the BLM Field Office Cultural Staff and Field Manager (661-391-6000) shall be immediately notified by personnel responsible for the project. All work at the site of discovery, and in any other locations where damage to the cultural resource could occur, shall also cease until written approval by the BLM.

If human remains are inadvertently discovered on BLM, all activity will immediately cease surrounding the unanticipated discovery. The holder will ensure that the discovery is secured and protected and will immediately notify the BLM Field Manager (661-391-6000). The BLM will adhere to current regulations regarding the treatment of human remains (Native American Graves Protection and Repatriation Act, 43 CFR 10). Access and use of the area can proceed with written approval from the Field Manager once the appropriate level of review has been determined and completed.

Prior to all new ground disturbance activities as part of the reclamation process, E&B will contact the BLM Archaeologist Zachary Day (email: [zday@blm.gov](mailto:zday@blm.gov), phone: 661-428-7509) and Tribal monitors, previously identified through Tribal coordination letters, so that spot check monitoring of the newly disturbed areas can be planned and coordinated.

[OBJ]