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Information Bulletin To All Federal and Indian Oil and Gas  
Lessee/Operators

Prevention of potential bird and bat mortalities  
caused by production equipment design

**Purpose:**

To encourage oil and gas operators to prevent potential and unnecessary losses that could result to birds and bats. Colorado BLM is notifying all oil and gas operators under a federal lease of this potential mortality situation that exists with open exhaust stacks on their production equipment (dehydrators and heat treaters).

**Background:**

Mortality of birds and bats associated with open exhaust stacks on production equipment is of concern to the Colorado Bureau of Land Management. Within the last year, BLM has been working with several oil and gas production companies as well as requiring our petroleum inspectors to conduct informal inspection of production units to determine the extent of these potential losses. At this time, our Colorado information is nonconclusive as to the extent of bird and bat mortalities from these open exhaust stacks. A few on-site samples (14) were conducted in the Rifle and Rangely areas by removing gas well exhaust stacks. In the Rifle area, bone remains of a bluebird were found in one unit. In addition, on-site visual inspections were made of gas well facilities over the state by petroleum engineering technicians. From these inspections (approximately 200 units), no bird or bat carcasses were documented.

However, reports from different sources in New Mexico conclude that a problem does exist and is one of great concern. Different sources from BLM offices in New Mexico have reported losses from birds trapped inside fired units of gas wells. Cavity nesting birds such as mountain bluebirds and flickers, along with finches and shrikes were most often found in exhaust stacks. Results of volunteer surveys by industry and random sampling by BLM have shown that bird loss was occurring. Information provided by different gas companies varied greatly. Bird mortality reported varied from a small percentage of well locations to finding several birds at a single location. The information gathered did show that losses were generally occurring throughout the San Juan Basin and in

Southeastern New Mexico. Equipment on a total of 2,500 wells was examined and results reported to BLM were that 252 birds and bats were found. Bird losses were more concentrated towards equipment that was fired intermittently.

**Recommended Action:**

Because many uncontrollable factors are contributing to the decline of several species of migratory birds, there is one factor that BLM and oil and gas industry can control through discouraging birds and bats from entering exhaust stacks. This can be accomplished by covering the exhaust stack with a screen or other excluder devices to discourage birds and bats from entering, perching, and nesting on stacks. These preventative measures by industry would improve the environment for birds and bats.

**Responsibility:**

BLM is mandated to prevent unnecessary loss of wildlife including birds and bats through actions implementing resource programs. Owners of production equipment operating with a federal lease are responsible for preventing loss of birds and bats. Irresponsible parties could be in violation of the Migratory Bird Treaty Act subject to financial penalties enforced by the U.S. Fish and Wildlife Service. Under the Migratory Bird Treaty Act, any take of birds (causing death) is considered a violation of the Act and enforced by US Fish and Wildlife Service. Migratory birds protected by the Migratory Bird Treaty Act are listed in 50 C.F.R. § 10.13.

**Future Action:**

BLM will continue to evaluate the potential mortality problem through our routine oil and gas inspection program of facilities. Any escalation of this potential problem may result in requiring operators to provide protective measures on exhaust stacks.

If you need additional information or have questions, please contact your local BLM Office managers.

/S/David H. Strunk