

# RIGHT-OF-WAY PLAN OF DEVELOPMENT

## COMPRESSOR STATION, STORAGE YARD & ACCESS ROAD

- I. **APPLICANT:** Dudley & Associates, LLC  
1776 Lincoln Street, Room 904  
Denver, Colorado 80203-1026  
303-861-0800
- II. **PROJECT NAME:** Seminole Road CBM Pilot Project Compressor Station, Storage Yard & Access Road Right-Of-Way
- III. **LEGAL DESCRIPTION OF LANDS TO BE CROSSED:**  
T23N-R85W Sec. 10: E<sup>2</sup>NW<sup>4</sup> ROW WYW-147569

### 1.0 PURPOSE AND NEED FOR THE FACILITY

The purpose of the Seminole Road CBM Pilot Project Compressor Station, Storage Yard & Access Road Right-Of-Way ("**PROPOSED PROJECT**") is to compress and dehydrate natural gas produced from the Seminole Road CBM Pilot Project ("**PILOT PROJECT**") wells, located north of Sinclair, in Carbon County, Wyoming. Once treated, produced natural gas will be distributed for sale by pipeline delivery to the CIG interstate transmission facility near Sinclair, Wyoming. A right-of-way ("**ROW**") application will follow shortly for construction of this pipeline.

U.S. demand for natural gas continues to steadily rise and official Energy Information Administration estimates project a 30% increase in domestic consumption by 2010. Natural gas is an essential part of the present and future U.S. energy supply due to its general availability across a well developed transmission infrastructure and its unusually clean combustion properties as compared with other fuels. Moreover, the development of abundant domestic reserves of natural gas reduces this country's dependence on foreign sources of energy, thereby improving the U.S. international balance of payments and contributing to the economic stability required for industrial production, efficient power generation and national security. The environmental advantages of natural gas combustion versus other conventional fuels are set out in the Clean Air Act Amendments of 1990.

Dudley & Associates, LLC ("**DUDLEY**") anticipates that the **PILOT PROJECT** could reasonably begin producing natural gas by the end of 2001. The **PROPOSED PROJECT** will therefore be needed to compress and dehydrate this produced natural gas before it can enter a pipeline for delivery to the CIG interstate transmission facility near Sinclair, Wyoming, about 20 miles south of the project site. Presently there are no natural gas compression, dehydration or transportation facilities at or near the vicinity of the project site.

### 2.0 FACILITY DESIGN FACTORS

**DUDLEY** proposes construction of a compressor station, storage yard and access road on or across approximately 11 acres of Federal land. See Exhibit I for a map of the proposed compressor station, storage yard, and access road. Equipment associated with the compressor station includes:

1. two (2) natural gas powered compressors with 1000 hp Caterpillar engines; and
2. one (1) dehydrating unit.

The equipment will be housed in a metal building to be fabricated on site. Its dimensions have yet to be determined, however, **DUDLEY** anticipates that the height will not exceed ~25 feet above ground level.

The storage yard will contain pipe racks for storage of casing, tubing, and rods. Additional storage will be available for pumping units, motors, separators and miscellaneous valves, fittings, poly pipe and other general oil field equipment.

**DUDLEY** is requesting a 520' wide x 820' long permanent (i.e. 30 year) **ROW** for the compressor station and storage yard; and a 30' wide by 275' long permanent (i.e. 30 year) road **ROW** for the access road to the compressor station and storage yard. These proposed **ROWS** will result in approximately 11 acres of disturbance during construction and operation (10 acres associated with the compressor station and storage yard, and 1 acre associated with the access road). The proposed **ROW** sites were selected in order to avoid unnecessary disturbance to archaeological sites, visual resources and other resources protected by **NEPA** (see detailed discussion below).

The **PROPOSED PROJECT** will be excavated with customary earth moving equipment to conform to the general design characteristics presented in Exhibits II through V. The entire 11-acre location will be fully **CROWNED** for drainage with perimeter ditching to channel away rain and snow melt. The compressor station and storage yard will be fenced with four-strand barbed wire on the interior of the ditches, fitted with "H" braces where necessary, and equipped with a locked gate. Veg-

etation and topsoil will be stripped from the entire location and stockpiled along the edge of the pad and access road (see Exhibit II).

The compressor station pad and access road will be appropriately surfaced in accordance with Appendices C and D of the **DECISION RECORD AND FONSI** for the **PILOT PROJECT** (see Section 3.0 below). An enclosed building, typically used for such purposes, will protect the compression equipment. **DUDLEY** anticipates that this building and stack will not exceed ~25 feet above ground level. It will be painted to blend with the surrounding landscape, per BLM specifications identified in the Appendices C and D of the **DECISION RECORD AND FONSI** (see Section 3.0 below).

### 3.0 ADDITIONAL COMPONENTS

This **PROPOSED PROJECT** contains no additional components. **ROW** applications will follow shortly for the associated pipeline and fiber optic cable (including access roads) to be co-located in the same trench/boring. Natural gas produced for compression and dehydrating will be developed from the **PILOT PROJECT**, as described and authorized by BLM in two documents:

1. Environmental Assessment for the Seminole Road Coalbed Methane Pilot Project, Carbon County, Wyoming ("**EA**") and;
2. Decision Record and Finding of No Significant Impact For the Seminole Road Coalbed Methane Pilot Project Carbon County, Wyoming ("**DECISION RECORD AND FONSI**").

### 4.0 GOVERNMENT AGENCY AND DUDLEY PERSONNEL INVOLVEMENT

BLM issues **ROW** grants for compressor stations under the authority of the Mineral Leasing Act of 1920. The **ROW** grant application for the **PROPOSED PROJECT** will be subject to the standard approval procedures as outlined in **ROW** grant regulations (43 CFR 2800). The **PROPOSED PROJECT** lies within areas covered by the BLM Great Divide Resource Management Plan ("**RMP**"). This plan provides for the development of compressor stations and associated facilities with stipulations to protect natural resources.

The contacts at **DUDLEY** for this **ROW** application are:

- |    |               |  |              |
|----|---------------|--|--------------|
| 1. | Kate Fay      | Environmental & Regulatory Specialist      | 303-910-2830 |
| 2. | Ken Morr      | Operations & Compliance Specialist         | 303-863-4488 |
| 3. | Don Schroeder | Land Manager                               | 303-863-4483 |
| 4. | David Jensen  | Operating Manager/Chief Operating Officer  | 816-842-5671 |
| 5. | David Dudley  | Operating Manager/Chief Executive Officer. | 303-863-4480 |

If Kate Fay cannot be reached by telephone, please contact Don Schroeder.

BLM Rawlins Field Office staff who have offered guidance with this **ROW** application and the related pre-application site visit are:

- |    |                 |                             |
|----|-----------------|-----------------------------|
| 1. | Gay Seay        | Pipeline ROW Team Leader    |
| 2. | Krystal Clair   | Recreation/Visual Resources |
| 3. | Janelle Wrigley | Realty                      |
| 4. | Frank Blomquist | Wildlife and T&E            |
| 5. | Ken Peacock     | Water Resources             |
| 6. | Larry Jackson   | Project Inspector           |
| 7. | Brenda Newman   | EA Team Leader.             |

The Rawlins Field Office staff can be reached at 307-328-4200.

Construction and operation of the proposed compressor station, storage yard and access road will also require authorizations from several federal, state, and local agencies. **DUDLEY** will obtain applicable authorizations and comply with all applicable rules and regulations contained in them.

As mentioned in Section 3.0 above, environmental documents relevant to the **PROPOSED PROJECT** include the **EA** and the **DECISION RECORD AND FONSI**. These documents were prepared by BLM in accordance with the National Environmental Protection Act ("**NEPA**") and comply with all subsequently passed applicable regulations and laws.

The **PROPOSED PROJECT** for which this **ROW** application is being submitted lies within the area evaluated by the **EA**. It represents part of the natural gas compression, dehydration and distribution system needed to support the **PILOT PROJECT**. Given the extensive investigations already completed for this **EA**, including the environmental practices and protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI**, no additional background data collection is required for this **ROW** application's site-specific **NEPA** investigation, with the exception of a cultural resources investiga-

tion of areas to be disturbed. Section 6.14 addresses additional cultural resources investigations undertaken for this proposed **ROW**.

## **5.0 COMPRESSOR STATION, STORAGE YARD AND ACCESS ROAD RIGHT-OF-WAY LOCATION**

The **PROPOSED PROJECT** will be accessed by traveling north from Sinclair, Wyoming, on County Road 351 for a distance of ~18 miles; from there, turn right (east) on an existing oilfield road and travel ~1 mile to the compressor station and storage yard access road. The **PROPOSED PROJECT** is not expected to be visible from County Road 351 because it will be located on a plateau hidden behind a knoll. The entire site embraces approximately 11 acres (see attached map) within the E<sup>2</sup>SE<sup>4</sup> of Section 4-23N-85W.

## **6.0 RESOURCE VALUES AND ENVIRONMENTAL CONCERNS**

This section addresses measures **DUDLEY** or its contractors will take to avoid, minimize, or mitigate potential impacts from development of the **PROPOSED PROJECT**. BLM may consider exceptions to these measures on a case-by-case basis if a thorough analysis determines the resource for which the measure was developed will not be affected by the **PROPOSED PROJECT**. **DUDLEY** or a designated contractor approved by BLM will ensure that qualified individuals will be available during project construction as needed to ensure that all mitigation measures discussed in this Plan of Development ("**POD**") are followed. BLM will be consulted on a case-by-case basis as necessary to establish alternative plans in the event unanticipated protection measures are necessary due to the discovery of protected resources.

As part of this **ROW** application, **DUDLEY** will fully adhere to all applicable environmental practices and protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI**. Any additional (completed or ongoing) environmental/resource investigations (e.g. cultural, biological, wetlands, etc.) described below are a result of recommendations made by BLM staff after conducting an investigation of the **PROPOSED PROJECT** site on May 31, 2001. These are referenced in the appropriate section below. BLM-approved consultants hired by **DUDLEY** are conducting all investigations and writing associated follow-up reports. These reports will be provided to BLM within 5 days of completion.

### **6.1 SURVEY MONUMENTS**

**DUDLEY** will protect all survey monuments, benchmarks, witness corners and other monuments within the **ROW** that exist to delineate property boundaries and characteristics. In the event any such monument is destroyed or damaged in the course of project construction or by its operations, **DUDLEY** will arrange for a registered land surveyor to restore it in accordance with the *Manual of Surveying Instruction for the Survey of Public Lands of the United States, 1973 Edition*. **DUDLEY** will record the survey with Carbon County and send a copy to the BLM Rawlins field office.

### **6.2 FIRE CONTROL**

**DUDLEY** will notify the BLM Rawlins Field Office of any fires observed during project construction and will comply with all rules and regulations administered by the BLM concerning the use, prevention, and suppression of fires. In the event of a fire, **DUDLEY** or its contractors will initiate fire suppression actions immediately until the fire is out or until relieved by an authorized representative of the agency or landowner on whose land the fire occurred. In the event heavy equipment is needed for fire suppression, it will be used beyond the **ROW** only after prior approval of the BLM or landowner unless there is imminent danger to life or property. **DUDLEY** will be responsible for all costs associated with the suppression (and subsequent rehabilitation) of fires resulting from its operations.

### **6.3 PERMITTING AND CONSTRUCTION**

**DUDLEY** and its contractors will adhere to all construction plans identified in this **POD**. All necessary permits and arrangements for access will be acquired prior to construction.

**DUDLEY** will confine all construction and reclamation actions to a width that is practical and will not allow disturbance to occur beyond the authorized **ROW**.

### **6.4 AIR QUALITY, NOISE AND ODOR**

**DUDLEY** will adhere to all applicable WAAQS and NAAQS, and permit requirements including preconstruction compliance testing, operating permits and other regulations, as required by the WDEQ-AQD. **DUDLEY** has met with WDEQ-AQD and agreed to file permits to construct and operate the compressor station combustion equipment (two 1000 hp 4-stage reciprocating engines, de-rated for altitude and one 20 mm scf/day dehydration unit) in early August 2001. The compressors will be equipped with oxidation catalyst to reduce emissions and meet Best Available Control Technology requirements, as determined by the WDEQ-AQD. **DUDLEY** will also perform a dispersion modeling analysis to determine the air quality impacts of the **PROPOSED PROJECT**. **DUDLEY** will keep copies of the WDEQ-AQD air permits and supporting analysis at its office in Denver, Colorado and provide them to BLM upon request.

Dust suppression techniques will be used as necessary on all disturbed areas (e.g. access roads, cleared **ROW** and spoil piles).

**DUDLEY** will minimize noise and odor associated with the **PROPOSED PROJECT** by keeping all internal combustion engines muffled and maintained. In addition, the compressors will be housed in a building to further reduce noise and odor levels. Vehicle speeds will be restricted.

## **6.5 GEOLOGY AND GEOLOGIC HAZARDS**

The geology as well as the potential for geologic hazards in the area is assessed in detail in the **EA** for the **PILOT PROJECT**. The potential for seismic activity in the project area is low and there are no known or suspected active faults in the area. As such, geologic hazards are unlikely and not addressed further in this **ROW** application.

## **6.6 MINERAL RESOURCES**

Leasable and locatable mineral resources are assessed in detail in the **EA** for the **PILOT PROJECT**. Please refer to this document for a discussion of such resources. The treatment and compression of produced natural gas from the **PILOT PROJECT** would result in a depletion of CBM resources in the area, but would not interfere with the potential recovery of other minerals. CBM production will be a net addition to the economy of Carbon County, the state of Wyoming, and the U.S. through the creation of stable jobs and tax revenues associated with oil and gas production.

## **6.7 PALEONTOLOGY**

Paleontological resources were evaluated and discussed in detail in the **EA** for the **PILOT PROJECT**. No known significant fossil localities have been identified in the project area. Please refer to the **EA** and Appendices C and D of the **DECISION RECORD AND FONSI** for further discussion and the applicable environmental practices and protection measures **DUDLEY** will take to minimize impacts to paleontological resources.

If **DUDLEY** uncovers any paleontological resources during ground disturbing activities, **DUDLEY** will suspend all operations that may further disturb such materials and immediately contact the BLM. BLM would then arrange for a determination of significance and, if necessary, would recommend a recovery or avoidance plan. Mitigation of paleontological resources would be on a case-by-case basis and **DUDLEY** would incur all associated costs. Surface disturbing activities would not resume until BLM issues a Notice to Proceed.

## **6.8 SOILS**

Soils were assessed in detail in the **EA** for the **PILOT PROJECT**. **DUDLEY** will ensure that topsoil sufficient to facilitate revegetation will be segregated from subsoils during all construction operations and returned to the surface upon completion of operations. Topsoil stockpiles will be seeded with native vegetation protected to prevent erosion and protected to maintain soil microflora and microfauna.

**DUDLEY** will keep the area of disturbance to the minimum necessary for construction and operation of the **PROPOSED PROJECT**. Please refer to Appendices C and D of the **DECISION RECORD AND FONSI** for all applicable environmental practices and protection measures **DUDLEY** will take to minimize impacts to soils.

## **6.9 WATER RESOURCES**

Water resources, including streams and wetlands, were assessed in detail in the **EA** for the **PILOT PROJECT**. The site for this proposed **ROW** application is not located near any such resources. **DUDLEY** will fully adhere to all applicable environmental practices and protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI** to minimize impacts to water resources.

## **6.10 VEGETATION**

Vegetation resources were assessed in detail in the **EA**. **DUDLEY** will fully adhere to all applicable vegetation protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI**.

As part of this **PROPOSED PROJECT**, **DUDLEY** will control noxious weeds, apply herbicides, remove vegetation, and stabilize disturbed areas in accordance with all environmental practices and protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI**.

## **6.11 LIVESTOCK AND CROPLAND**

There is no cropland in the area of the **PROPOSED PROJECT**, although, as noted in the **EA**, livestock grazing does occur in the area. **DUDLEY** will coordinate project activities with the owner(s) of surface grazing permits to minimize conflicts with livestock movement or other ranch operations. **DUDLEY** will also build and maintain all fences, cattle guards, and other live-

stock-related structures required for their transportation network. In areas of high livestock use, **DUDLEY** will fence reclaimed land to ensure successful revegetation. Please refer to Appendices C and D of the **DECISION RECORD AND FONSI** for all applicable measures **DUDLEY** will take to ensure impacts to livestock and cropland are minimized.

## **6.12 WILDLIFE RESOURCES**

**DUDLEY** will implement all environmental practices and protection measures identified in Appendices C and D of the **DECISION RECORD AND FONSI** to ensure that impacts from the **PROPOSED PROJECT** on wildlife resources are reduced. These include minimizing impacts on wildlife access across the land (e.g. crucial big game winter range), raptors, sensitive species (see 6.13 below), economic species such as sage grouse, and fisheries.

## **6.13 THREATENED AND ENDANGERED SPECIES**

BLM completed a detailed Biological Assessment for the **PILOT PROJECT** that covers this proposed **ROW** application project site. At the request of BLM during the May 31, 2001 pre-**ROW** application site visit, **DUDLEY** engaged a BLM-approved consultant to complete a one-time mountain plover survey of all suitable mountain plover breeding and nesting habitats within 200 meters of the **PROPOSED PROJECT** site. An area of approximately 155 acres was investigated. No mountain plover were found and the July 5, 2001 letter from Mr. Peter Guernsey, TRC Mariah, to Ms. Gay Seay, BLM (with a copy sent to Mr. Frank Blomquist, BLM) provides further details of this investigation.

Appendices C and D of the **DECISION RECORD AND FONSI** contain extensive lists of commitments made by **DUDLEY** to mitigate impacts on a host of species. These include threatened and endangered species occurring or likely to occur in the area of the **PROPOSED PROJECT** (i.e., mountain plover, black-footed ferret, swift fox), and other species not considered threatened or endangered pursuant to the Endangered Species Act but protected by the BLM as "sensitive species" (i.e. white-tailed prairie dog and sage grouse). Please refer to Appendices C and D of the **DECISION RECORD AND FONSI** for lists of these measures. **DUDLEY** will adhere to these measures for this **PROPOSED PROJECT**.

Since the **PROPOSED PROJECT** lies within the project area assessed by the **EA** and will be implemented pursuant to the **DECISION RECORD AND FONSI**, no adverse effects to threatened species, endangered species or species proposed for listing are anticipated.

## **6.14 CULTURAL RESOURCES**

A BLM-approved archaeologist completed a Class III Cultural Resources Inventory and literature search on July 24, 2001 for all areas to be disturbed by the **PROPOSED PROJECT**. No cultural resources were discovered. **DUDLEY** anticipates receiving a report of this investigation by July 31, 2001, a copy of which will be simultaneously provided to BLM.

As discussed in detail in the **EA** and Appendices C and D of the **DECISION RECORD AND FONSI**, **DUDLEY** and its contractors will inform their employees about relevant federal regulations protecting cultural resources. If any cultural remains, monument sites, objects, or antiquities subject to The National Historic Preservation Act of 1966 or the Archeological Protection Act of 1979 are discovered during construction, activities shall immediately cease and the BLM will be notified. If this occurs, **DUDLEY** will comply with all resulting recommendations made by the BLM and WSHPO. Please refer to the Appendices C and D of the **DECISION RECORD AND FONSI** for the cultural resources protection measures.

## **6.15 VISUAL RESOURCES**

The project location is located within a Visual Resource Management Area ("**VRM**") Class III area. In a Class III area, changes in the basic elements of the characteristic landscape may be evident while remaining subordinate to the visual strength of the existing character of the landscape.

**DUDLEY** has designed all surface facilities associated with this **PROPOSED PROJECT** to minimize disturbance, to preserve protected viewsheds and to conform to the standards for the applicable **VRM** Class. The **PROPOSED PROJECT** will be located behind a knoll and it is anticipated that it will be concealed from view of the Seminole Road (approximately one mile to the West) and the Seminole Reservoir (its closest point being approximately four miles to the north). **DUDLEY** will paint facilities with the colors prescribed by BLM in Appendices C and D of the **DECISION RECORD AND FONSI**, to blend with the surrounding landscape.

## **6.16 SANITATION**

**DUDLEY** will maintain all construction and operations sites in a sanitary condition at all times. Waste materials, including human waste, trash, garbage, refuse, etc., will be disposed of promptly at an appropriate waste disposal site and in accordance with the **DECISION RECORD AND FONSI** for the **PILOT PROJECT**.

## **6.17 POWER, ELECTRIFICATION AND COMMUNICATIONS**

Any decision to electrify the **PROPOSED PROJECT** will be made after the **PILOT PROJECT** is determined to be commercially feasible. At that point, electric power may be utilized on the **PROPOSED PROJECT** site for which this **ROW** application is being submitted, for which **DUDLEY** will secure a **ROW** on public lands from the BLM. Until then, power for the **PROPOSED PROJECT** will be provided by two reciprocating engines (see Section 6.4 for description and discussion of air quality measures **DUDLEY** will undertake). Please refer to the **EA** for further discussion. **DUDLEY** will also file a **ROW** application, along with the pipeline **ROW** application referred to earlier in this **POD** for a fiber optic line for the sole purpose of two-way communication, command and control for automation of field operations.

## **6.18 FLOODPLAINS AND COASTAL ZONES**

The **PROPOSED PROJECT** site is not located near any floodplain or a coastal zone.

## **6.19 PROXIMITY TO HAZARDOUS WASTE SITES**

The **PROPOSED PROJECT** site is not located near any known hazardous waste site.

## **6.20 MISCELLANEOUS**

**DUDLEY** will adhere to all environmental practices and protection measures contained in Appendices C and D of the **DECISION RECORD AND FONSI**. They include those applying to ditches and culverts, litter, spill prevention, control and counter-measures, stormwater prevention (including development of a stormwater pollution prevention plan) and traffic and public safety. Please refer to the **DECISION RECORD AND FONSI** for specific measures.

## **7.0 PROJECT CONSTRUCTION**

### **7.1 PLANS AND SPECIFICATIONS**

Detailed surveys and drawings for the **PROPOSED PROJECT** are attached. Additional details will be provided to BLM as they become available. The design, engineering, maintenance, and inspection of the **PROPOSED PROJECT** will be performed by **DUDLEY** and its contractors in accordance with safe and proven engineering practices, in compliance with the **DECISION RECORD AND FONSI**.

### **7.2 CONSTRUCTION**

Construction will begin with BLM authorization, anticipated for September 2001. The goal is to complete the **PROPOSED PROJECT** by the end of November 2001, so that produced natural gas from the **PILOT PROJECT** can be treated and transported by pipeline (the **ROW** application for which will be submitted to BLM for consideration in two weeks) to the CIG interstate transmission facility near Sinclair. **DUDLEY** will oversee all aspects of construction by its contractors. **DUDLEY** will notify BLM at least five days prior to the anticipated start of construction and/or any surface-disturbing activities.

The construction effort will utilize earth-moving equipment to remove and store vegetation and topsoil in a manner that will minimize erosion and sedimentation. Ditches will be cut and the overburden used for crowning of **PROPOSED PROJECT**. The access road will be appropriately surfaced and graded, which construction will take 2 workers approximately 3 days. After final grading, a roustabout crew of 3 will need approximately 2 days to erect the fence and gate. No additional land will be necessary for staging or storage of the construction equipment. Next, a concrete foundation for the compressor and compressor site building will be poured and cured, and compressor station equipment will be delivered by truck to be set in place on the concrete foundation.

### **7.3 HAZARDOUS MATERIALS**

Hazardous and extremely hazardous materials are identified in the EPA's Consolidated List of Chemicals Subject to Reporting under Title III of the Superfund Amendments and Reauthorization Act of 1986. **DUDLEY** will take all measures necessary and appropriate to prevent and contain accidental discharges of any listed materials. Refueling and fuel storage will not occur within 500' of stream channels. Any unused or used engine oil or other lubricants will be stored in appropriately labeled containers and disposed of at an approved site. Lubricants will not be stored within 500 feet of stream channels.

**DUDLEY** will conform with provisions of the Toxic Substances Control Act of 1976. As such, any toxic substances that are used, generated by, or stored on the **ROW** or at facilities under the **ROW** grant will be handled in accordance with this law and its implementing regulations. Any release of toxic substances in excess of the reportable quantity as established in the Code of Federal Regulations (40 CFR 117.3) will be reported as required. **DUDLEY** will furnish copies of required reports to BLM within 5 working days of occurrence. Appropriate safety guides and emergency response procedures will

be adhered to for this project. Copies of emergency response plans are available for review at **DUDLEY**'s office in Denver, Colorado.

#### **8.0 ACCESS ROADS**

One new access road will be required as part of this **PROPOSED PROJECT**. The construction phase of the **PROPOSED PROJECT** will require no new roads. All equipment and vehicular access to the compressor station, storage yard and associated access road will be confined to existing roads and established **ROWS**. Upon approval of this **ROW** application, BLM would issue a **ROW** grant under the authority of FLPMA for the access road, located in Sec. 4-23N-85W. This road will be 275' long and be crowned and ditched for drainage. One 18' x 32' culvert will be installed on the access road at the entry to the compressor site.

#### **9.0 RECLAMATION, REHABILITATION AND STABILIZATION**

Reclamation and rehabilitation of the compressor station, storage yard and access road will take place immediately following project abandonment. This effort will include site stabilization. **DUDLEY** will be responsible for weed control on the disturbed areas within the **ROW** and will consult with BLM and/or local authorities for acceptable weed control methods. Disturbed areas not needed for the entire life of the project will be reclaimed, rehabilitated and stabilized in accordance with BLM guidance.

**DUDLEY** will create a post-project abandonment plan in accordance with BLM abandonment guidance in effect at the time of abandonment. It will include immediate removal and recycling (where practical) of all surface structures and reseeded all disturbed areas to regulatory agency specifications (See Appendix F of the **DECISION RECORD AND FONSI**).

#### **10.0 OPERATION AND MAINTENANCE**

**DUDLEY** will perform daily checks of all equipment at the **PROPOSED PROJECT** site, including compression and dehydration equipment. Periodic maintenance will be performed on the equipment to insure mechanical reliability. The equipment will have a remote notification system installed to automatically alert the operator of equipment failure.

#### **11.0 TERMINATION**

The compressors and yard will be in operation 365 days per year. The estimated duration for this project is 30 years. At the end of the useful life of the project, **DUDLEY** will obtain necessary authorizations from the BLM to abandon the facility (see Section 9.0, above). **DUDLEY** will contact BLM to arrange a pre-termination conference and a joint inspection of the **ROW** to agree on a mutually acceptable abandonment plan.