

**ENVIRONMENTAL ASSESSMENT TITLE PAGE
RAWLINS FIELD OFFICE**

EA No. WY-030-EA2-229

Name or Title of Action: Dudley & Associates, LLC Seminole Road Natural Gas Gathering Pipeline/Access Road and Compressor Station/Storage Yard/Access Road Project

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|------------------------------|---|-------------------------|
| File Name and Number: | <u>Gas Pipeline Right-of-Way (ROW):</u> | <u>WYW-155296</u> |
| | <u>Pipeline Access Road #1 ROW:</u> | <u>WYW-147569</u> |
| | <u>Pipeline Access Road #2 ROW:</u> | <u>WYW-155297</u> |
| | <u>Pipeline Access Road #3 ROW:</u> | <u>WYW-155297</u> |
| | <u>Pipeline Access Road #4 ROW:</u> | <u>All Private Land</u> |
| | <u>Compressor Station/Storage Yard Site ROW:</u> | <u>WYW-153853</u> |
| | <u>Compressor Station/Storage Yard Access Road ROW:</u> | <u>WYW-147569</u> |

Location:

Gas Pipeline ROW Public Lands: T21N, R84W:

Sec. 6, Lots 3, 4, 6, 7, 10, 11, NE1/4SW1/4, SE1/4

Sec. 8, Lots 4, 8, NE1/4 SW1/4, W1/2 SE1/4

Sec. 16, W1/2 NW1/4, SE1/4 NW1/4, NE1/4 SW1/4, W1/2 SE1/4, SE1/4 SE1/4

Sec. 22, W1/2 NW1/4, SE1/4 NW1/4, E1/2 SW1/4

Sec. 34, N1/2 NE1/4, NE1/4 NW1/4

T22N, R85W:

Sec. 4, Lot 4, SW1/4 NW1/4, N1/2 SW1/4, SE1/4 SW1/4, SW1/4 SE1/4

Sec. 14, SW1/4

Sec. 16, NE1/4 NE1/4

Sec. 24, SW1/4 SW1/4

T23N, R85W:

Sec. 10, NW1/4

Sec. 16, W1/2 W1/2

Sec. 28, W1/2 W1/2

Gas Pipeline ROW Private/State Lands: T21N, R84W:

Sec. 7, NE1/4 NE1/4

Sec. 8, NW1/4

Sec. 17, NE1/4 NE1/4

Sec. 21, NE1/4 NE1/4

Sec. 27, E1/2 W1/2

Sec. 35, N1/2 NW1/4

T22N, R84W:

Sec. 31, SW1/4 SW1/4

T22N, R85W:

Sec. 9, E1/2

Sec. 15, NE1/4, N1/2 NW1/4, NE1/4 SE1/4

Sec. 23, SW1/4 NE1/4, E1/2 NW1/4, N1/2 SE1/4, SE1/4 SE1/4

Sec. 25, W1/2

Sec. 36, W1/2 NE1/4, E1/2 NW1/4, SE1/4

T23N, R85W:

Sec. 9, S1/2 NE1/4, N1/2 S1/2, SW1/4 SW1/4

Sec. 21, W1/2 W1/2

Sec. 33, W1/2 W1/2

Location (continued):

Pipeline Access Road #1 ROW Public Lands: T23N, R85W:

Sec. 4, S1/2 SE1/4

Sec. 8, NE1/4 NE1/4

Sec. 10, NW1/4

Pipeline Access Road #1 ROW Private/State Lands: T23N, R85W:

Sec. 9, N1/2 N1/2

Pipeline Access Road #2 ROW Public Lands: T22N, R85W:

Sec. 4, SW1/4 NW1/4

T23N, R85W:

Sec. 32, SW1/4 SW1/4

Pipeline Access Road #2 ROW Private/State Lands: T22N, R85W:

Sec. 5, Lots 2, 3, 4, S1/2 NE1/4

T23N, R85W:

Sec. 31, SE1/4 SW1/4, S1/2 SE1/4

Pipeline Access Road #3 ROW Public Lands: T21N, R84W:

Sec. 6, Lot 14, SE1/4 SW1/4

Sec. 8, SW1/4, SW1/4 SE1/4

Sec. 16, S1/2 NW1/4, NE1/4 SW1/4, SE1/4

Sec. 22, SE1/4, NW1/4, NE1/4 SW1/4

Sec. 26, NW1/4 NW1/4, NW1/4 SW1/4

Pipeline Access Road #3 ROW Private/State Lands: T21N, R84W:

Sec. 7, W1/2 NE1/4, SE1/4 NE1/4, NE1/4 NW1/4

Sec. 17, Lots 1, 2, 5, 6, NW1/4 NE1/4

Sec. 21, NE1/4 NE1/4

Sec. 26, SW1/4 NW1/4

Sec. 27, NE1/4 NE1/4

T21N, R85W:

Sec. 1, Lot 3, SW1/4 NE1/4, SE1/4 NW1/4, N1/2 SE1/4, SE1/4 SE1/4

T22N, R85W:

Sec. 25, E1/2 SW1/4

Sec. 36, E1/2 W1/2

Pipeline Access Road #4 ROW Private/State Lands: T21N, R84W:

Sec. 35, SW1/4 NE1/4, E1/2 NW1/4

Compressor Station/Storage Yard Site ROW Public Lands: T23N, R85W:

Sec. 10, E1/2 NW1/4

Applicant: Dudley & Associates, LLC (Dudley)

Field Office: Rawlins

INTRODUCTION

NEED FOR THE PROPOSED ACTION

The Proposed Action described in this Environmental Assessment (EA) is necessary to compress, dehydrate, and transport to market natural gas resources. Additional details of the Proposed Project can be found in the two ROW Plans of Development (PODs) for the Proposed Project (i.e., the gathering pipeline and access road POD, and compressor station, storage yard, and access road POD), which are incorporated by reference in this EA.

According to the Energy Information Administration in May 2001, U.S. demand for natural gas continues to rise and official Energy Information Administration estimates project a 52% increase in domestic consumption by 2020. 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 fossil 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 anticipates that commercial production of natural gas from the Seminole Road Coalbed Methane Pilot Project (see WY-030-EA00-288) would begin in late 2002. The Proposed Project will be constructed with new materials, with a special emphasis on safety, and located to avoid sensitive areas, where practical. Presently there are no natural gas compression, dehydration, or transportation facilities at or near the vicinity of the project site.

CONFORMANCE WITH LAND USE PLAN

Natural gas development, including gas processing and transportation, is covered by the Great Divide Resource Management Plan (RMP). The RMP, which was approved on November 8, 1990 in a Record of Decision, indicates that "all Bureau of Land Management (BLM) -administered public lands will be open to consideration for placement of utility/transportation systems". Development of the Proposed Project as described in the Proposed Action is in conformance with RMP decisions.

RELATIONSHIP TO STATUTES, REGULATIONS, OR OTHER PLANS

The BLM issues ROW grants for pipelines and compressor stations under the authority of the *Mineral Leasing Act of 1920*; access road ROWs on public lands are granted under the authority of the *Federal Land Policy and Management Act of 1976* (FLPMA). ROW applications and associated PODs are subject to standard approval procedures as outlined in ROW grant regulations (43 *Code of Federal Regulations* [C.F.R.] 2800). The aforementioned PODs provide sufficient detail to appraise the technical adequacy of, and environmental effects associated with, the Proposed Project, including provisions for the safe operation and adequate protection of surface resources/land uses, and other environmental components. The PODs also include adequate measures for reclamation of disturbed lands.

The Proposed Action is consistent with the Decision Record and Finding of No Significant Impact (FONSI) (BLM/WY/PL-01/017+1310) for the Seminole Road Coalbed Methane Pilot Project (WY-030-EA00-288). The Pilot Project EA also identifies the need for this Proposed Project.

The Proposed Action involves the construction and operation of a natural gas compressor station for gas compression and dehydration, and an associated storage yard (approximately 10 acres of federal land disturbance); a 20.3-mi long, 16-inch diameter buried natural gas gathering pipeline (approximately 243 acres total disturbance, 108 acres federal land disturbance, and 54 acres of 30-year life-of-project [LOP] disturbance) for delivery and sale of processed and compressed gas to an existing interstate gas pipeline; and four associated access roads, two of which (Access Roads #2 and #3) will require new surface disturbance (approximately 51 acres total, 26 acres on federal lands).

The Proposed Action is consistent with state and local government programs, plans, zoning, and regulations that apply to the action. The State of Wyoming has primacy over air quality and associated emissions from the proposed compressor station. A copy of the Wyoming Department of Environmental Quality, Air Quality Division (WDEQ-AQD) permit (No. CT-2833) for the compressor station is included as Attachment 1 to this EA.

PROPOSED ACTION AND ALTERNATIVES

Several alternative locations and designs for the pipeline route, compressor station/storage yard, and access roads were considered during the development of the Proposed Action. The locations and designs proposed in the PODs were selected to minimize and/or eliminate potential adverse project impacts to wetlands/riparian areas, wildlife (including mountain plover), known cultural resource sites, visually sensitive areas, and important recreation areas. Additional impact reduction techniques provided in the PODs and current Proposed Action include pipeline routing parallel to existing linear features (i.e., roads, a petroleum products pipeline, two-track routes) where practical; use of boring/directional drilling techniques for perennial water and wetland crossings; use of existing access routes to limit road improvement actions; confinement of all road improvement actions within existing disturbed areas; and siting or routing facilities away from important recreation and visually sensitive areas.

Standard design features and management practices, applicable to pipeline and compressor station construction and operation are included in the Proposed Action, and are specified in the PODs. The PODs contain complete descriptions of the proposal.

The Proposed Action would occur on lands managed by the BLM as well as on private and State of Wyoming lands. Dudley has represented to the BLM that legal access agreements to both fee and state lands will be in place prior to commencing operations on these properties.

Dudley would comply with all applicable federal, state, and local laws and regulations as they relate to public health, safety, and environmental protection during construction, operation, and maintenance of the Proposed Project.

PROPOSED ACTION

The Proposed Action is to approve Dudley's ROW applications for the Proposed Project as described in the PODs. Dudley proposes to construct:

- a pipeline, two pigging stations (one pig launching and one pig receiving station), two block valves, and a cathodic protection system;
- a compressor station and storage yard; and
- various road improvements along two of four proposed access routes.

Total temporary project disturbance would be approximately 304 acres. Total LOP disturbance would be approximately 125 acres.

Gathering Pipeline. The pipeline would be constructed with the customary equipment to conform with standard pipeline construction practices. The proposed pipeline is designed for a maximum capacity of 200 million cubic feet per day (mmcf/d). The maximum allowable operating pressure of 1,170 pounds per square inch gauge (psig) is set to ensure mechanical integrity of the line and provide a physical limitation on the volume of gas which the receiving line can accommodate; however, day-to-day pipeline operating pressures would change commensurate with throughput. The pipeline would have an outside diameter of 16-inches, a wall thickness of 0.250 inch and would be made from Grade X-52 steel pipe. Total temporary disturbance from the proposed pipeline is anticipated to be approximately 243 acres (108 acres on federal land), and total LOP disturbance on federal lands would be 54 acres.

A 100-ft wide temporary construction ROW and a 50-ft wide permanent (30-year) operating ROW would be required for the 20.3-mi pipeline route. The 100-ft temporary construction ROW width would be sufficient for all pipeline construction activities including boring and staging activities at the Union Pacific Railroad/Saint Mary's Creek crossing, where the pipeline would be bored underground for approximately 335 ft underground. However,

directional drilling operations designed to avoid disturbing wetlands, riparian areas, and cultural resources at the North Platte River would require additional temporary work space on both sides of the 100-ft construction ROW on both the north and south sides of the river. The pipeline would be drilled for approximately 1,500 ft underground at this crossing. A 150-ft wide by 250-ft long temporary (3-week) construction ROW on the south side of the river (50 x 250 ft outside the 100-ft pipeline construction ROW), and a 200-ft wide by 200-ft long temporary construction ROW on the north side of the river (100 x 200 ft outside the 100-ft pipeline construction ROW) would be required to allow for directional drilling operations and related storage and staging activities.

Two block valves, two pigging stations, a temporary (3-week) staging and equipment storage area near the North Platte River, a temporary (1-week) staging and storage area near the Union Pacific railroad crossing, surface equipment at the interconnect, pipeline markers along the pipeline route, and a cathodic protection system would also be constructed in association with the pipeline.

The two mainline block valves would be installed along the pipeline in accordance with U.S. Department of Transportation requirements. Each of the block valve stations would be contained entirely within the permanent pipeline ROW and located aboveground in such a way as to not be visible from the Seminole Road (Carbon County Road 351).

The two pigging stations, one for launching and one for receiving, would be constructed. Pigs would initially be run through the pipeline to remove any debris left from new construction. During service, pigs would be run periodically to remove free liquids from the line to maintain line efficiency and control corrosion. The pig launching station would likely be sited within the compressor station storage area at the northern terminus of the pipeline, whereas the pig receiving station would be sited within the existing interstate pipeline interconnect area at the southern terminus of the pipeline.

Additional surface equipment to be located at the interconnect location includes one or two storage tanks (approximately 100 barrel [bbl] capacity) to hold liquids captured during pipeline cleaning and one or two storage tanks (approximately 100 bbl capacity) to hold pigging sludge.

Once the pipeline is in place, the cathodic protection station would be designed, located, and constructed by a qualified corrosion contractor able to determine the best location and design for such a system. The system would be built entirely underground within the permanent pipeline ROW, likely at the northern or southern pipeline terminus.

After construction is completed, pipeline markers would be installed within the permanent ROW at a line-of-sight interval and at road crossings to identify the approximate pipeline location within the ROW.

Dudley would install the pipeline in one spread using approximately 50 workers, and pipeline construction is anticipated to occur at a rate of 1 to 2 mi per day in open country, with slower progress in areas with existing underground facilities. Additional field personnel may be working at the river directional drill and railroad bore sites.

Pipe would be brought to the area by rail or truck, and all pipe storage would occur on private lands or along already disturbed rail sidings. Pipe and other materials would be hauled by truck and strung along the ROW. The compressor site storage yard would also be used for pipeline construction staging and equipment storage.

Dudley would clear the construction corridor of vegetation and obstacles, ensuring that topsoil is segregated and preserved so that it can later be replaced. For the purposes of this EA, it is conservatively assumed that the entire 100-ft wide pipeline construction ROW would be disturbed. However, every effort would be made to disturb only that area actually necessary for safe and efficient pipeline construction. Blading and grading would be necessary to clear an adequate and safe working area along the pipeline ROW so that a 2- to 3- ft wide trench would be excavated with a trencher or backhoe. A bending machine would be used to bend the pipe to fit the trench. The pipe would be welded together and joints would be coated. Side-boom tractors would lower the pipe into the trench. The trench would be padded as necessary to prevent damage to pipe coating. After the pipe has been placed in the trench, it would be backfilled and compacted to prevent subsidence. Any excavated material that cannot be placed in the trench would be disposed of in compliance with landowner or government requirements (e.g., feathered out over the

disturbed area prior to topsoil replacement). The top of the pipeline generally would be buried to depths of 3.5 to 4.5 ft.

Portions of the trench would be open for no more than 20 days and the maximum unfilled trench length would be three miles. Trench bridges would be used to ensure wildlife and livestock movements are maintained. The open trench would be monitored regularly for trapped wildlife or livestock. Dudley would notify appropriate landowners when trenching occurs on their allotments or properties.

The pipeline would be bored under the Union Pacific Railroad/Saint Mary's Creek crossing at a depth of 16.6 ft using a horizontal bore for a length of approximately 335 ft to minimize disturbance and to ensure no wetlands, riparian areas, cultural resources, or railroad operations would be affected. The pipeline would be directionally drilled beneath the North Platte River for a distance of approximately 1,500 ft and at a maximum depth of 15 ft. The directional drill pads would be located far enough away from the river to ensure that no wetlands, riparian areas, or cultural resources are affected. Drill mud used at the directional drill site would be disposed of at approved off-site locations at the discretion of the BLM and/or landowner.

Dudley would use water as needed for dust control during construction. The pipeline would be pressure tested by filling the pipeline with water and pressurizing it to no less than 125% of its designated operating pressure for eight hours to verify mechanical integrity. Test and dust control water would be acquired either from the Sinclair municipality or from existing Pilot Project operations. A total of approximately 950,000 gal of water would be required for dust control and testing.

Dudley would discharge test water into ephemeral drainages at a rate commensurate with drainage capacity. Prior to discharge, Dudley would obtain all necessary discharge permits from the WDEQ, Water Quality Division (WQD) and would ensure that appropriate erosion control equipment (e.g., energy dissipaters) is installed.

Dudley would replace or repair all existing roads, fences, structures, or drainage facilities which may be damaged during construction to a reasonable standard of quality no less serviceable than that which existed before Dudley began pipeline construction. Fences crossed during construction would remain down during daylight hours while construction operations are occurring; however, when daily construction operations are concluded, fences would be reinstalled in a manner to prevent livestock passage.

Prior to placing the pipeline in service, Dudley would confirm to the BLM that the pipeline has been constructed and tested in accordance with the terms of the applicable ROW. Additionally, Dudley would submit surveyed construction detail plats to the BLM within 6 months of actual construction.

Dudley would routinely inspect the pipeline route for problems such as erosion, pipe exposure, ROW condition, unauthorized encroachment on the ROW, and any other conditions that may result in a safety hazard or require preventive maintenance. Dudley would notify the BLM prior to any non-emergency maintenance or repairs to the line to determine if there are resource concerns in those areas and to obtain the necessary approval. Inspections would be conducted on foot or by vehicle along the proposed ROW. Vehicles would be restricted to designated access roads and the ROW. If pipeline damage occurs from external sources, repair and/or replacement would be immediately completed. Dudley would develop an emergency response procedure stipulating that repair and replacement operations will begin immediately in the event of damage or failure of the mechanical integrity of the pipeline.

Access Roads. Four access roads would be developed and would require temporary construction and permanent ROWs of 50 ft. All access roads would be used during construction and permanent access needs would be as follows: Access Road #1--pigging station/launcher and compressor station access; Access Road #2--block valve access; Access Road #3--block valve access; and Access Road #4--pipeline interconnect and pigging station/receiver access. Travel frequency along Access Roads #2 and #3 would be notably less (monthly) than that for Access Roads #1 and #4, which may be used several times a week.

All access during pipeline construction and operations would be from existing improved routes or along the proposed pipeline ROW to minimize the amount of land disturbance for the Proposed Project. No new roads would be constructed, and all improvements to existing roads would occur within previously disturbed areas. No

improvements would be necessary for Access Roads #1 and #4. Access Road #2 would require approximately 1,500 ft of blading within an already disturbed area. Access Road #3 would require varying degrees of improvement occurring entirely within previously disturbed areas. The total mileage of all access roads would be 12.24 mi, with 4.29 mi of these roads requiring some level of improvement on previously disturbed federal lands. Total access road disturbance would be approximately 51 acres (26 acres on federal lands).

Access roads and the proposed pipeline ROW would be used to transport crews and equipment needed for project construction. All equipment and vehicular traffic would be confined to existing roads and established ROWs. Roads used for the project would be maintained and/or repaired as necessary to conditions equal to or better than those which existed before project-related use.

Compressor Station and Storage Yard. Equipment associated with the compressor station includes two natural gas powered compressors with 1,000 horsepower (hp) Caterpillar engines and one dehydrating unit. This equipment would be housed in a metal building (with a stack) anticipated to be less than 25 ft in height and painted to blend with the surrounding landscape per BLM specifications. The storage yard would contain a small maintenance building, pipe racks for casing, tubing, and rods as well as additional storage space for pumping units, motors, separators, and miscellaneous valves, fittings, poly pipe, and other equipment.

Dudley is requesting a 520-ft wide x 820-ft long permanent (i.e., 30-year) ROW for the compressor station and storage yard and a 30-ft wide by 275-ft long permanent (i.e., 30-year) road ROW for access, resulting in approximately 10 acres of disturbance during construction and operation.

Excavation would occur with customary earth moving equipment such that all locations will be fully crowned for drainage with perimeter ditching. The compressor station and storage yard would be fenced with four-strand barbed wire and equipped with a locked gate. Vegetation and topsoil would be stripped and stockpiled for use in reclamation. The compressor station pad and access road would be appropriately surfaced.

Construction Schedule. Pipeline construction is proposed to begin in August 2002 and end in November 2002. Dudley would notify BLM at least 5 days prior to the anticipated start of operations for construction and/or surface disturbing activities. The design, engineering, construction, maintenance, and inspection of the Proposed Project would be performed by Dudley and its contractors and subcontractors in accordance with safe and proven engineering practices, in compliance with the all applicable rules and regulations, and as directed by the BLM.

Termination/abandonment. At the end of the useful life of the pipeline (30 years), Dudley would obtain the necessary authorizations from the BLM to abandon the facilities. Dudley would contact the BLM to arrange a pre-termination conference and a joint inspection of the ROWs to agree on an acceptable plan.

Abandonment would be accomplished in accordance with the policies and standards employed by the BLM at the time of abandonment. The pipeline would be purged of all combustible materials and retired in place. All above ground facilities would be removed and unsalvageable materials would be disposed of at authorized sites. Regrading and revegetation of disturbed areas would be completed according to BLM or landowner standards, and the abandoned ROWs would revert to the control of the landowner.

Proposed Action Environmental Protection Measures. Dudley would obtain all applicable authorizations prior to project development and would comply with all applicable rules and regulations during project construction and operation. Dudley and its contractors would take appropriate measures to avoid, minimize, or mitigate potential impacts from development of the Proposed Project. The 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 would not be affected by the Proposed Project. Dudley or a designated contractor approved by the BLM would ensure that qualified individuals are available during project construction, as needed, so that all mitigation measures discussed in this EA are applied. The BLM would 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.

Dudley would protect all survey monuments, benchmarks, witness corners, and other monuments within the ROWs. In the event any such monument is destroyed or damaged during project construction or operations, Dudley would 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 would record the survey with Carbon County and send a copy to the BLM.

Dudley would notify the BLM of any fires observed during project construction, would comply with all rules and regulations administered by the BLM concerning the use, prevention, and suppression of fires, and would adhere to a project-specific Fire Management Plan (see Attachment 2). In the event of a fire, Dudley or its contractors would 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 would be used outside of authorized ROWs only after prior approval of the BLM or private landowner unless there is imminent danger to life or property. Dudley would be responsible for all costs associated with the suppression (and subsequent rehabilitation) of fires resulting from its operations.

Dudley and its contractors would adhere to all construction plans identified in the ROW application PODs, and all necessary permits, plans, and arrangements for access would be acquired prior to construction. Furthermore, Dudley would confine all construction and reclamation actions to ROWs, and would not allow disturbance to occur beyond authorized ROW limits.

Dudley would use dust suppression techniques on disturbed areas (e.g., access roads, cleared pipeline ROW, spoil piles). Dudley would also reclaim all disturbed areas as soon as practical to facilitate soil stabilization, dust control, and to minimize wind erosion.

Dudley would minimize noise by keeping all internal combustion engines muffled and well maintained. Vehicle speeds also will be restricted to 35 mph to minimize noise and dust on project-required ROWs. Furthermore, compressors would be housed in a building to further reduce noise and odor.

Dudley would monitor construction activities for paleontological resources and if these resources are uncovered, Dudley would immediately suspend all operations that may further disturb such materials and contact the BLM. Dudley would not resume surface disturbing activities until the BLM determines the significance of the resource and recommends appropriate action. Mitigation for paleontological resources would be on a case-by-case basis as identified by the BLM. Dudley would incur all associated costs.

Dudley would ensure that topsoil sufficient to facilitate revegetation is segregated from subsoils during all construction operations and returned to the surface upon completion of operations. Dudley would keep the area of disturbance to the minimum necessary for safe project construction and operation by utilizing previously disturbed areas for project construction and access, and by clearly designating ROW boundaries and associated equipment/materials storage yards and staging areas. Dudley would further protect soils by avoiding construction activity during particularly muddy times and by using the practices identified in the project-specific Stormwater Pollution Prevention Plan (SWPPP) (see Attachment 3).

All disturbed ROW areas would be reseeded to landowner or BLM specifications. Seeding would take place as soon as practical after completion of construction, most likely during the spring of 2003. If conditions permit, seeding may occur immediately after construction in fall 2002. Seeding would be repeated until a satisfactory stand is established as determined by the BLM or landowner.

Dudley would control noxious weeds and other weedy species along the ROWs by using BLM- and/or county-specified control techniques identified following BLM inspection of reclaimed and other areas following project construction. Herbicide applications, if required, would be kept at least 500 ft from known special status plant populations. Efforts would be made to avoid disturbing areas with existing populations of noxious weeds. Furthermore, the BLM may require that all construction equipment be adequately cleaned prior to use on this project and/or throughout project construction to ensure noxious weed seeds are not spread by construction equipment.

Seeding and stabilizing of disturbed areas would be conducted in accordance with BLM-approved reclamation guidance and would include: initiating revegetation operations in the first appropriate season after completion of construction activities; recontouring and use of BLM-approved native species during revegetation to aid in soil stabilization; restricting project-related travel to designated ROWs unless there is an emergency; avoiding areas with high erosion potential and/or rugged topography, where practical; employing environmental protection measures

identified in the SWPPP; ensuring that reclamation activities include the use of fencing when wildlife and/or livestock are impeding successful vegetation growth; and minimizing the removal or disturbance of vegetation by developing and implementing reclamation protocol as described in Appendices C, D, and F of the Decision Record and FONSI for the Pilot Project (BLM/WY/PL-01/017+1310).

Dudley would coordinate project activities with local ranching operations to minimize conflicts with livestock movement or other ranch operations and will maintain all fences, cattle guards, and other livestock-related structures required for their transportation network. In areas of high livestock use and where practical, Dudley may fence reclaimed federal lands to ensure successful revegetation. During pipeline construction, Dudley would employ trench bridges at appropriate intervals to facilitate safe and easy access by livestock and wildlife across open trenches. Dudley would also regularly monitor and, in the unlikely event livestock or wildlife become trapped in the trench, remove the animals as soon as practical.

Dudley would implement general wildlife protection measures which include: implementing and communicating to field staff policies designed to control poaching and littering and convey that any intentional poaching or littering may result in dismissal; enforcing existing drug, alcohol, and firearms policies; installing trench bridges at appropriate intervals over open trenches during construction to facilitate wildlife crossings and prevent wildlife from becoming trapped in the open trench; regular monitoring of open trenches for trapped wildlife; advising project personnel of appropriate speed limits (35 mph) on project access roads; informing project personnel about wildlife laws; netting and/or fencing areas potentially hazardous to wildlife, where appropriate; and using erosion control techniques that minimize impacts to fisheries.

Dudley would apply the following protection measures to reduce the potential for adverse effects to threatened, endangered, proposed, and BLM-sensitive species. Dudley would comply with all existing (see Appendices C, D, and E of the Decision Record and FONSI for the Pilot Project [BLM/WY/PL-01/017+1310]), and any future decisions regarding threatened, endangered, proposed, and BLM-sensitive species reached during consultations between BLM, Dudley, and the U.S. Fish and Wildlife Service (USFWS). Furthermore, Dudley would implement additional surveys for these species as required by BLM, and if found, further consultations would be initiated, as necessary, and construction activities relocated or curtailed until the BLM, USFWS, and Dudley concur on appropriate actions to avoid adverse effects. Dudley also would have a BLM-approved biologist on-site during construction, as deemed appropriate by the BLM.

To minimize potential impacts to cultural resources, Dudley and its contractors would inform 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, construction activities would immediately cease, and the BLM would be notified. If this occurs, Dudley would comply with all resulting recommendations made by the BLM and Wyoming State Historical Preservation Office.

The BLM VRM specialist would pick the colors that Dudley would paint facilities. Conflicts with those using the area would be minimized by posting appropriate warning signs and speed limits, by conducting Operator safety training, and by requiring project vehicles to adhere to speed limits (35 mph).

Dudley would maintain all construction and operation sites in a sanitary condition at all times. Waste materials, including human waste, trash, garbage, refuse, etc., would be disposed of promptly at an appropriate off-site waste disposal facility in accordance with all applicable BLM rules and regulations. Dudley and their contractors would be responsible for having on site the proper Material Safety Data Sheets (MSDS) for materials used during project construction and operation. All measures appropriate for the prevention and containment of accidental discharges would be taken. Fuel storage would not occur within 500 ft of stream channels, wetlands, and open water areas. Dudley would also adhere to its Spill Prevention and Control Countermeasure (SPCC) Plan. All chemicals would be handled in an appropriate manner to minimize the potential for leaks or spills to the environment. Management of accidental releases, spills, and fires involving hazardous materials would be handled in accordance to Dudley's SPCC Plan and Dudley would abide by all applicable federal, state, and local laws or regulations as regards hazardous materials.

All overflow and roadway ditches crossed by the pipeline will be cleared of any material, which could obstruct water flow. Work would be accomplished so that reasonable conformance to the previous line, grade, and cross section is achieved. If any culverts clog due to project activities, the culvert would be cleared to provide unobstructed flow. All applicable road design and maintenance requirements, sewage and garbage disposal requirements, the SWPPP, appropriate speed limits, and noise and odor control requirements would be implemented.

NO ACTION ALTERNATIVE

Under the No Action Alternative, the BLM would deny construction of the pipeline and compressor station on federal lands as currently proposed, while allowing existing land uses to continue. No ground would be disturbed and no impacts to the existing physical and biological environment would occur. However, demand for natural gas would eventually necessitate some alternative means of product supply (e.g., alternate routing). The analysis of a No Action Alternative provides a benchmark, enabling decision-makers to compare the magnitude of environmental effects of the Proposed Action.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

The following critical elements of the human environment were considered during preparation of this EA. These elements either do not occur in the area or are adequately mitigated by the Proposed Action.

- Areas of critical environmental concern (none present)
- Floodplains (avoided by boring/drilling)
- Wetlands and riparian zones (avoided by boring/drilling)
- Prime or unique farmlands (none present)
- Native American religious concerns (none identified)
- Threatened or endangered species (adequately protected)
- Water quality (surface [avoided by boring/drilling] and ground [not affected])
- Wild and scenic rivers (none present)
- Wilderness values (no wilderness or wilderness study areas present)
- Environmental justice (not affected)
- Invasive nonnative species (adequately mitigated)
- Wastes (hazardous and solid) (adequately mitigated)
- Cultural resources (adequately avoided/mitigated)

In addition to the critical elements referenced above, reviews for impacts to air quality, wildlife, socioeconomics, livestock, noise, paleontology, recreation, soils, subsurface resources, vegetation, and visual resources were also conducted.

This EA impact assessment was written considering the PODs as part of the Proposed Action. No mitigation measures beyond those identified in the PODs are recommended.

Air Quality. Air quality in the project vicinity is generally considered good. Pollutant emissions from the Proposed Project would occur in two phases, the first occurring during construction (primarily from fugitive dust and construction vehicle exhaust), with the second being primarily from compressor station operations. Of the two phases, the construction phase would emit the most visible air pollutants, due to dust from construction vehicle traffic. Visibility would be affected near roads and construction sites primarily during construction. Due to the short duration of construction operations, these emissions would be minimal. Airborne pollutant concentrations resulting from compressor station emissions, which include oxides of nitrogen (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and formaldehyde, would be in compliance with existing WDEQ-AQD permit CT-2833 (see Attachment 1). Dudley would adhere to all applicable Wyoming Ambient Air Quality Standards (WAAQS) and National Ambient Air Quality Standards (NAAQS) as directed by the BLM and/or WDEQ-AQD.

Noise and Odor. Like pollutant emissions, noise and odors associated with the Proposed Project would occur in two phases--during construction and operation. Short-term noises and odors would occur proximal to construction areas

during construction, whereas long-term noise increases and odors would occur near the compressor station site. The Proposed Action would increase noise levels in the immediate area due to construction and compressor station operation. Wildlife in the area may be adversely affected; however, only temporary wildlife displacement would occur during construction activities, and it is anticipated that most wildlife would adapt to the long-term increased noise levels associated with the compressor station. Furthermore, because of the remoteness of the area and considerable availability of adjacent areas with few human noise sources, project-produced noise would likely have a negligible affect on the human environment

Geology and Geologic Hazards. Given the nature of the Proposed Project and the terrain it crosses, no extensive geologic investigation was conducted. However, extensive investigations completed for the nearby Pilot Project (WY-030-EA00-288) indicate the potential for seismic activity in the region to be low. There are no known active faults in the area. Furthermore, no geological concerns were identified during multiple project-specific reviews implemented by the BLM Geologist.

Mineral Resources. While the Proposed Project does not directly involve leasing and locating mineral resources, it is designed to process and transport such resources. Some loss of access to mineral resources could occur from areas beneath project-required features (e.g., compressor station, pipeline); however, no mineral development operations are currently proposed and most potential future operations could still occur. No oil and gas conflicts were noted during a BLM project-specific review of the area. The Proposed Project would result in a net gain for the economy of Carbon County, the State of Wyoming, and the U.S. due to the creation of stable jobs and tax revenues associated with natural gas processing and transportation.

Paleontology. No significant fossil localities are known to occur in the area of the Proposed Project, nor were any identified during multiple project-specific reviews implemented by the BLM geologist.

Soils and Vegetation, Reclamation, Rehabilitation, and Stabilization. Soils in the area are generally shallow to deep loams to sandy clay loams, with wind erosion hazard potentials being moderate and water erosion hazard potentials being moderate to severe as identified during BLM project-specific reviews. Potential impacts would include mixing of soil horizons, soil compaction, loss of topsoil productivity, an increase in wind and water erosion, and a slight potential for contamination through accidental materials spills.

Vegetation in the area, as described in Appendices C and D of the Pipeline and Access Roads POD and verified during BLM project-specific reviews, consists of eight community types, all of which are common to the region. These types are: mixed grass/shrubland; sagebrush/shadscale shrubland; mixed grass/low shrub; cushion plant; greasewood shrub; riparian; rock outcrop; and disturbed. Noxious weeds observed in the area include leafy spurge (along the North Platte River), Russian knapweed (near the railroad crossing), and whitetop (at several existing disturbed areas). Other weedy species known from the area include halogeton, Russian thistle, cheatgrass, curlycup gumweed, goatsbeard, and goosefoot, which all primarily occur on existing disturbed areas.

Project construction would result in the disturbance of soils and removal of vegetation from approximately 304 acres of land; however, all but the approximately 10 acres at the compressor site would be reclaimed immediately following construction. Direct impacts would include short-term loss of vegetation on construction-required areas and long-term impacts on areas required for project operations (these areas would be devoid of vegetation for the LOP). Indirect impacts would include the long- and short-term potential for exposure of soil to increased wind and water erosion, an increased potential for undesirable and/or noxious weed invasion/spread, changes in vegetative species abundance and cover, reduction of wildlife habitat and livestock forage availability, and changes in visual aesthetics.

Water Resources. Ground water would not be affected by the Proposed Project. Surface water in the area occurs in the North Platte River and Saint Marys Creek; however impacts to these resources would be minimized by: avoiding surface waters through the use of boring and directional drilling techniques; adhering to the mitigation measures identified in the SWPPP (see Attachment 3); and complying with the *Clean Water Act*, recommendations specified in the *Jurisdictional Wetlands and Other Waters of the U.S. Report* (see Appendix C of the Pipeline and Access Road POD), and associated U.S. Army Corps of Engineers 404 Permit requirements. No wetlands and less than 0.1 acre of waters of the U.S. would be affected by the Proposed Project.

Livestock Grazing. Livestock grazing does occur on project-required lands and the Proposed Action would not preclude livestock grazing. Livestock may be temporarily displaced during construction; however, they would return to most areas after completion of construction. Impacts to livestock grazing because of the presence of long-term project features would be minimal. It is estimated that the general livestock carrying capacity of the area is between 7 and 9 acres per animal unit month (AUM); therefore, temporary forage loss is estimated to be approximately 34 to 44 AUMs and LOP loss is estimated to be approximately 14 to 18 AUMs.

Wildlife Resources. Key wildlife resources on project-required lands include sage grouse, raptors, and big game species, and these resources are described in detail in Appendix D of the Pipeline and Access Road ROW Application POD, and are further assessed in BLM project-specific wildlife reviews. The primary impacts to wildlife occurring in the area would be direct loss of habitat until areas are adequately reclaimed and indirect loss of habitat due to increased human presence and noise.

Three sage grouse leks are known to occur within 2 mi of project-affected lands, and of these, one lek located in NENW of Section 5, T22N, R85W, occurs within 0.25 mi of proposed Access Road #2. However, no surface disturbance activities are proposed for this road segment, nor is any other surface disturbance proposed within 0.25 mi of any known leks. Approximately 8.3 mi of the proposed pipeline route would be constructed within 2.0 mi of known sage grouse leks, and this area as well as other sagebrush-dominated areas are likely used for sage grouse nesting, brood rearing, and wintering. However, since project construction is proposed for August–November (i.e., outside of important sage grouse nesting, brood rearing, and wintering periods), Proposed Project impacts would be negligible.

A search of the BLM database (i.e., overlay information) revealed numerous raptor nests within 1.0 mi of Proposed Project features. The activity status of many of these nests is unknown. Since project construction is proposed for August–November (i.e., outside of the raptor nesting season [February 1–July 31]), Proposed Project impacts would be minimal.

Wyoming Game and Fish Department (WGFD) data reveal the presence of crucial winter yearlong range for pronghorn antelope and mule deer along portions of the proposed pipeline and access road corridors. Construction activities in these crucial winter ranges would not occur during crucial winter periods (i.e., November 15–April 30), unless granted an exception by the BLM.

Threatened, Endangered, Proposed, and BLM-sensitive Species. Federally listed threatened, endangered, and proposed species potentially affected by the Proposed Project are black-footed ferret, Ute ladies' tresses, blowout penstemon, bald eagle, mountain plover, and North Platte River species. These resources are described in detail in Appendix D of the Pipeline and Access Road ROW application POD, and are further assessed in BLM project-specific wildlife reviews. With the implementation of protection measures as described in the ROW application POD, no adverse effects to threatened, endangered, proposed, or BLM-sensitive species are anticipated.

Surveys for black-footed ferret were completed as directed by the BLM and USFWS on potentially affected black-footed ferret habitat (i.e., suitable prairie dog colonies) during 2002, and no ferret or sign indicating the presence of ferret was observed. Therefore, the Proposed Project is not likely to adversely affect the endangered black-footed ferret.

All potential Ute ladies' tresses habitat would be avoided by boring or directional drilling; therefore, this species would not be affected.

No suitable habitat (active sand dunes) for blowout penstemon would be affected; therefore, the Proposed Project would not affect the species.

Although bald eagle observations have been made on and adjacent to project-required lands, no known bald eagle nests or winter roosts are known to occur within 1.0 mi of the area. Migrating eagles and those wintering at locations sufficiently close to the Proposed Project may occasionally fly over or forage on the area. However, since no known nests or roosts occur near the Proposed Project, nor are nests or roosts likely to be established, the Proposed Project is not likely to adversely affect bald eagle.

While no suitable mountain plover nesting habitat occurs at the proposed compressor station site, suitable nesting habitat does occur along proposed access road and pipeline corridors. However, since project construction is scheduled for August-November, outside of the mountain plover breeding season (i.e., April 10-July 10), the Proposed Project is not likely to adversely affect this species.

Since 1978, the USFWS has consistently taken the position in its Section 7 consultations that federal agency actions resulting in water depletions to the North Platte River system may affect the endangered whooping crane, interior least tern, pallid sturgeon, and eskimo curlew, as well as the threatened piping plover, bald eagle, and western prairie fringed orchid. Since no North Platte River depletions would occur from this project, the project would not adversely affect these species.

Cultural Resources. Class III cultural resources inventories and file searches have been completed for all proposed disturbance areas associated with the Proposed Project. Where cultural resources were located during these inventories, Proposed Project features were relocated to avoid any known cultural resources. Therefore, the proposed project could have a minimal affect on cultural resources.

Visual Resources. The Proposed Project is located within a Visual Resource Management (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. Project activities may attract attention, but should not dominate the view of the casual observer. Project related changes should repeat the basic elements of form, line, color, and texture found in the predominant natural landscape features. With the implementation of mitigation measures as described in ROW application PODs the Proposed Project would not violate VRM Class III standards.

There would be both short-term and long-term impacts to visual resources. During construction, dust plumes from traffic may be apparent in the vicinity of access roads and construction sites. However, this visual impairment would only occur during construction. The compressor station and other aboveground features would remain visible for the LOP.

Dudley, working with the BLM VRM Specialist to reduce long-term impacts and visual intrusions to the Seminole Road Scenic Byway have sited project facilities on both public and private lands behind hills and ridges. With the exception of the compressor station, roads, block valves, pipeline markers, pigging stations, and storage tanks there are no permanent surface facilities associated the Proposed Project, and Dudley has designed these facilities to minimize disturbance, preserve viewsheds, and conform to the standards for VRM Class III areas.

Recreation. Primary recreational activities in the area include: hunting for pronghorn antelope, mule deer, upland game birds, coyotes, and other small game; camping; hiking; wildlife and wild horse viewing; off-road vehicle use; and general sightseeing. Construction operations would have an impact on recreational opportunities in the immediate vicinity of construction areas during construction by temporarily displacing people who would normally use these area for recreational purposes. Furthermore, person wishing to use the area may be displaced from the compressor station site for the LOP. Easier area access may also allow more people to use the area while discouraging other users. People that want a more primitive recreational experience would be less likely to use the area.

Hazardous Materials. The Proposed Project is not located near any known hazardous waste sites. Certain materials identified by the EPA as hazardous materials may be used for or produced by the Proposed Project. Since project operations would comply with all applicable federal and state laws concerning hazardous materials and the Operator's SPCC Plan, no impacts are anticipated.

Transportation. Construction may cause minor transportation-related impacts such as increased truck traffic to and from the area; however, most impacts would be temporary and limited. Construction, operation, and maintenance are not expected to cause safety hazards or to notably inconvenience motorists or other area users. Construction traffic would be limited to approved access routes.

Socioeconomics. Project construction and operation would have a benefit on the local economy through increased revenues from production royalties and other taxes as well as through potential employment opportunities.

Residual Impacts. Residual impacts for the LOP include:

- loss of vegetation/soil productivity, direct wildlife habitat, and livestock forage from approximately 10 acres;
- wildlife and persons wishing to use area in the vicinity of the compressor site;
- Some air quality impairment from emissions from the compressor station, consistent with the WDEQ air quality permit.
- visual impairment within viewsheds containing visible project features.

Cumulative Impacts. Cumulative impacts would primarily result from those of this Proposed Action in combination with those resulting from the Pilot Project (WY-030-EA00-288), and can be considered minimal provided the Proposed Project including appropriate environmental protection measures as specified in this EA and in ROW application PODs are implemented. Cumulative impacts to wildlife include direct and indirect habitat loss through displacement from Proposed Project disturbed areas, areas disturbed during development of the Pilot Project, areas disturbed during road improvement actions along the Seminole Road, and adjacent undisturbed areas due to increased human presence and noise. There is a potential for the Proposed Project to have increased adverse effects on recreational opportunities on public lands within the immediate proximity of the compressor station and construction areas during construction. However, due to the low level of development in adjacent areas, the mix of public and private lands throughout the area, and the limited level of recreation known to occur on most the area, the recreationists that may use the area could conduct their activities in adjacent areas that provide the levels of isolation and solitude often desired. The visual quality of the area would be reduced by the Proposed Project primarily during construction, but construction activities would be temporary and most impacts would occur only during project construction and would be undetectable upon reclamation. The more permanent project features (i.e., compressor station, access roads) would not dominate the landscape and would be compatible with existing VRM classifications. Air emissions from the proposed project would contribute to regional declines in visibility.

No additional developments other than the ongoing work to improve the Seminole Road are currently proposed for the area. However, additional developments for oil and gas resources may occur in the area. Any cumulative impacts associated with any new development actions would be analyzed in consideration of this project, other existing projects, and other reasonably foreseeable actions

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