MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline

Environmental Impact Statement
Volume Two: Final

July 1980

Department of Interior
Bureau of Land Management

NOTICE

This is Volume Two of the Environmental Impact Statement (EIS) for MAPCO's Rocky Mountain Liquid Hydrocarbons (LHC) Pipeline. Volume One of the EIS is the Draft Environmental Impact Statement (DEIS) (Int. DES 80-25) which was filed with the Environmental Protection Agency on April 21, 1980. The comment period for the DEIS ended June 16, 1980.

Since responses to comments received on the DEIS did not require significant changes in data or analyses, Volume One was not reprinted in its entirety. This Final EIS (Volume Two) consists of written comments received during the public review process, substantive comments presented at public hearings, and the responses to the comments. Additions and corrections to pages of Volume One are also included.

A limited number of copies of Volume One of the EIS are available on request from the Bureau of Land Management, New Mexico State Office, P.O. Box 1449, Santa Fe, New Mexico, 87501.

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
NEW MEXICO STATE OFFICE
P.O. BOX 1449
SANTA FE, NEW MEXICO 87501

IN REPLY REFER TO

1792 (922)

Dear Reader:

Enclosed is the Final Environmental Impact Statement for MAPCO's proposed Rocky Mountain Liquid Hydrocarbons Pipeline. This Final Environmental Impact Statement includes a Summary of the Draft Statement, changes to the Draft resulting from public review and comment, a record of the public comments on the Draft, and responses to those comments. The Draft Environmental Impact Statement and this volume together constitute the Final Environmental Impact Statement.

The Final Environmental Impact Statement is not the decision document. The decision on the proposal will be based on the analysis contained in the Final Environmental Impact Statement and public concerns and comments. No action can be taken for at least thirty (30) days following filing of the final statement with the Environmental Protection Agency and distribution to the public. A record of decision that outlines the decision and rationale will be prepared and made available as soon as a decision is reached.

Many thanks to all those individuals and organizations who provided suggestions and comments on the draft. Your help has been invaluable in the preparation of a Final Environmental Impact Statement which will assist us to more efficiently and effectively manage the public lands.

Sincerely yours,

William A. Zimmerman

State Director

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

IN COOPERATION WITH
U.S. DEPARTMENT OF AGRICULTURE,
FOREST SERVICE,
ROCKY MOUNTAIN AND INTERMOUNTAIN REGIONS

FINAL ENVIRONMENTAL IMPACT STATEMENT ON MAPCO'S ROCKY MOUNTAIN LIQUID HYDROCARBONS PIPELINE

MAPCO INC., (the applicant), formerly known as Mid-America Pipeline Company, proposes to construct 1172 miles of common carrier pipeline and related facilities from its Hobbs Station in Gaines County, Texas, through New Mexico, Colorado, and Utah to the Rock Springs, Wyoming area to transport liquid hydrocarbons. The proposed pipeline would connect various gas processing plants in New Mexico, Colorado, Utah, and Wyoming to the distribution system at Hobbs station (through the applicant's pipeline). From Hobbs station the liquids can be transported either through the applicant's system to the Upper Midwest area of the United States or to connections in the Gulf Coast Region. The goal is to collect and transport, through a system of gathering lines and main pipeline, up to 65,000 barrels per day (BPD) of mixed stream liquid hydrocarbons.

Alternatives Analyzed:
a. Douglas Pass, CO
b. Little Mountain, UT and WY
c. Pine Mountain, UT and WY
d. No Action
e. Delay of Project

Type of Action (X) Administrative ( ) Legislative

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FTS 476-1468

Date Filed with EPA: Draft: April 21, 1980

Final:

Arthur A. Zimmerman
STATE DIRECTOR, NEW MEXICO

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LIST OF TABLES

MAPCO FEIS ERRATA SHEET

1. Page 82, letter 29, Response should read: "Stipulations are now being developed to mitigate potential paleontological impacts."

2. Page 157, letter 72, Response should read: "Please see response to letter 39."

3. Page 245, Biological Assessment Summary Table, Remarks column, last entry. Last sentence should read: "Recent surveys of potential habitat in northeast Utah revealed no population along the route in that area."

4. Page 3-13 of the DEIS was not included in the FEIS section on changes to the text. DEIS page 3-13 should have the following paragraph added to the end of the section on Land Use Controls and Constraints: "The proposed action (West leg) would cross Davis Bottom at the Flaming Gorge NRA. Site-specific stipulations would be developed by the Forest Service to mitigate impacts."

SUMMARY

MAPCO INC. (the applicant), formerly known as Mid-America Pipline Company, proposes to construct 1172 miles of common carrier pipeline and related facilities from its Hobbs Station in Gaines County, Texas through New Mexico, Colorado and Utah to the Rocky Mountain Overthrust Area of Wyoming to transport liquid hydrocarbons (LHC). The proposed pipeline would connect various gas processing plants in New Mexico, Colorado, Utah and Wyoming to the existing distribution system at Hobbs Station. From Hobbs Station the liquids could be transported either through MAPCO's system to the Upper Midwest area of the United States or through pipeline connections to the Gulf Coast.

In response to MAPCO's right-of-way (ROW) grant application to the Bureau of Land Management (BLM), New Mexico State Office (NMSO) (Application Number NM36230, filed April 18, 1979), the NMSO assumed the function of lead agency. The application is being processed under the authority of Section 28 of the Mineral Leasing Act of 1920, as amended (30 USC 185). This Final Environmental Impact Statement (FEIS) was prepared by the BLM NMSO Non-Bureau Energy Initiatives (NBEI) team under an Interagency Cooperative Agreement (Number CA-NMSO-128) with the U.S. Department of Agriculture (USDA), Forest Service, Rocky Mountain and Intermountain Regions.

The purpose of the proposed action is to transport up to 65,000 barrels per day of mixed stream hydrocarbons. The mixed stream would consist of butane, ethane, iso-butane, natural gasoline and propane. Ethane is used in the manufacture of polyethylene materials. Propane is used for space heating, cooling, fuel and peak industrial loads. The butanes and natural gasoline are used by refineries for the manufacture of motor fuels. Characteristically, the hydrocarbons are gaseous under atmospheric conditions. In storage and in the pipeline these products are handled and transported under pressure (ranging from 350 to 1835 pounds per square inch) in a liquid state.

In compliance with regulations implementing the procedural provisions of the National Environmental Policy Act (40 CFR, Part 1501.7), a public scoping process was conducted in the early stages of preparing the Draft Environmental Impact Statement (DEIS). The scoping process consisted of 18 public meetings and numerous contacts with affected agencies. During this process, the scope of issues to be analyzed and significant issues related to the proposed action were identified.

Eighteen alternatives were identified and considered in the DEIS. A screening procedure was used to select reasonable alternatives to the proposed action. Of those considered, 5 alternatives were selected for detailed analysis. They consisted of the "no action" alternative, the "delay of project" alternative and 3 route segment alternatives.

The Douglas Pass (CO) alternative (72 miles) was selected as an optional route segment to the 74-mile Baxter Pass (CO) segment of the proposed action. Two route segment alternatives were selected for the proposed segment reaching from northeastern Utah into southern Wyoming. The proposed action segment, called East of Little Mountain (63 miles), begins at Diamond Mountain (UT). The route would then traverse Rye Grass and Jesse Ewing canyons into Clay Basin (UT) and on to East of Little Mountain (at Highway 373, WY). The Little Mountain alternative (56 miles) departs the proposed action at Diamond Mountain, proceeds to Little Hole (UT), in the Flaming Gorge National Recreation Area (NRA). The alternative turns north to and over Little Mountain (WY), and then rejoins the proposed action. The Pine Mountain alternative (68 miles) follows the proposed action through Rye Grass and Jesse Ewing canyons (UT) where it departs the proposed action in a northeasterly direction to and over Pine Mountain (WY).

Construction, operation and maintenance of the following project components were considered in the impact analysis:

1. electrically operated injection pumps in various gas processing plants
2. main pipeline
3. gathering lines and spurs to processing plants
4. pump stations
   - electric service
   - telephone line
   - one microwave tower
5. above-ground gate valves and check valves
6. above-ground scraper traps with check valves
7. cathodic protection system
8. right-of-way markers

The DEIS (Volume One) consisted of 4 chapters, a glossary of terms, references and an index. Chapter One described the Purpose and Need, Authorizing Actions and the Proposed Action. The process of identifying and screening the 18 alternatives for selection for detailed analysis was also described.

A fundamental approach to the DEIS was reflected in Chapter One (Proposed Action and Alternatives). Numerous construction methods and resource considerations were incorporated as a part of the proposal. Implementation of these procedures for construction, operation and maintenance was assumed for the purpose of impact analysis. Inclusion of these applicant-proposed considerations and practices, in part, accounts for the relatively low number and magnitude of significant environmental impacts, which were summarized at the end of Chapter One.

As Chapter Two indicated, detailed impact analyses were conducted for the following resources and topics:

Climate
Air Quality
Geology (geologic hazards)
Mineral Resources
Paleontology
Soils
Water Resources (including 100-year Floodplains)
Vegetation (including Threatened and Endangered Species)
Wildlife (including Threatened and Endangered Species)
Cultural Resources
Visual Resources
Noise
Land Uses
  Agriculture (including Prime and Unique Farmlands)
  Forests
  Livestock Grazing
  Recreation
  Wilderness
Land Use Controls and Constraints
Transportation Networks
Social and Economic Conditions

Information on resource topics for which significant impacts were either determined to be likely or were unknown were included in the DEIS. They are Paleontology, Threatened or Endangered Species, Cultural Resources, Visual Resources, Land Use Controls and Constraints and Social and Economic Conditions.

For each potentially affected resource, Chapter Three of the DEIS presented analytic criteria by which the determination of significant impacts was made. Significant impacts were described for Visual Resources in 7 locations. Four other resources were described as having the potential to be significantly impacted (Paleontology, Threatened or Endangered Species, Cultural Resources and Social and Economic Conditions). In compliance with various requirements, negative declarations (no significant impacts) were made, including 100-year Floodplains, Prime and Unique Farmlands and Wilderness Resources. An energy-use analysis was also provided.

Throughout the majority of the route, no route segment alternatives were analyzed in

detail. Other alternatives were considered and screened because they did not meet criteria as discussed in the DEIS, Chapter 1, Alternatives. Two areas had route alternatives identified and analyzed in detail; (1) Baxter Pass versus Douglas Pass and (2) Little Mountain, Proposed Action (East of Little Mountain) and Pine Mountain in the tri-state area of Utah, Colorado, and Wyoming.

Based on environmental impact analysis, no significant differences were found between the route alternatives. Slight differences in site-specific requirements for mitigation or resource recovery potential were identified. Based on these differences, as identified in Chapter 3 of the DEIS, the BLM has selected preferred alternatives.

Analysis has led to the identification of Baxter Pass as the preferred alternative. This decision was based on the narrowness and crowded corridor of Douglas Pass and adverse effects anticipated in Canyon Pintado National Historic District.

In the tri-state area (that portion of the route between MP 800-863) the preferred alternative is the delay of the project. The Little Mountain Alternative is the least desirable because of problems associated with crossing through the Flaming Gorge NRA at Little Hole and adverse visual impacts which would occur on Goslin Mountain. Only slight environmental differences exist between the remaining two alternatives (Proposed Action and Pine Mountain). If the BLM New Mexico State Director makes the decision to issue a ROW, a delay would be necessary in selecting a route through this area in order to allow resolution of the wilderness inventory in the Red Creek Badlands area of the Proposed Action and to evaluate public concerns which have arisen concerning the Pine Mountain alternative. The Red Creek Badlands-Tepee Mountain Wilderness Study Unit (WSU) was expanded since publication of the DEIS and now includes an area through which one mile of the proposed action (East of Little Mountain alternative) would cross. Selection of the Pine Mountain alternative or the proposed action would be made following resolution of the wilderness questions and assessment of the issues raised regarding the Pine Mountain alternative and all other relevant information.

Chapter Four of the DEIS summarized the results of the scoping process. Lists of preparers, contributers and agencies consulted were also presented.

This Final Environmental Impact Statement (FEIS) contains additional information related to Consultation and Coordination, including:

- A Summary of public participation on the DEIS.
- A summary of the public hearings and meetings held during public review of the DEIS.
- A list of agencies who were sent copies of the DEIS and who were consulted during preparation of the draft statement.
- Oral and written comments received during public review of the DEIS, and the responses to those comments.
- Changes to the DEIS text resulting from public comments.

CONSULTATION AND COORDINATION

THE SCOPING PROCESS

Regulations for implementing the National Environmental Policy Act (40 CFR, Part 1501.7) require an early and open scoping process. During this process, the scope of issues to be analyzed and significant issues related to the proposed action were identified. Information obtained during the scoping process was one of the sources used to determine significant impacts to be addressed in detail in the Draft Environmental Impact Statement (DEIS).

Additional purposes of the scoping process were to inform affected federal, state and local agencies and other interested persons about the proposal, and to identify existing environmental reports and information related to the proposal. Related consultation and review requirements were also identified and addressed in the DEIS (Chapter One, Authorizing Actions). The purpose of the scoping process is to enhance better decisions through the achievement of these purposes. By emphasizing significant issues, the magnitude of paper work and the length of the statement are also reduced.

The scoping process involved discussions with the public, resource specialists and managers of BLM, and other relevant agencies. Written comments were received and compiled as a result of A-95 Clearing House distribution, Federal Register announcements, news releases, and articles about the proposal. Comments were also solicited during public scoping meetings.

Scoping Meetings

The regulations direct that the lead agency invite participation of affected federal, state and local agencies and other interested persons to join in the scoping process. Eighteen public meetings were held, as indicated in Table 1. A summary of each meeting, attendance lists, written comments solicited during the meetings, and public announcements are on file with BLM, NMSO.

A brief summary of each meeting follows:

Santa Fe, NM

Two scoping meetings were held in Santa Fe, New Mexico. The target groups for the first meeting were state and federal agencies. Thirteen individuals attended. The comments dealt primarily with routing along existing rights-of-way (ROW), coordination with the Fish and Wildlife Service and the Army Corps of Engineers. The second meeting was open to the general public and nine persons attended. The comments received were all of a general nature.

Denver, CO

Two scoping meetings were held in Denver, Colorado. The target groups for the first meeting were state and federal agencies. Nine individuals representing 8 different agencies attended. Comments included the suggested use of brush-beaters by the Colorado Division of Wildlife to clear brush in order to facilitate vehicle movement instead of blading the ROW. The National Park Service indicated that approval of an alternative through Arches National Park is unlikely, and the Environmental Protection Agency expressed concerns on river, stream and wetland area crossings.

The second meeting was open to the public and 9 individuals attended. Concerns regarding wilderness conflicts and impacts to farmlands were voiced as well as comments of a general nature.

Grand Junction, CO

The scoping meeting in Grand Junction, Colorado was open to the general public and 9 individuals attended. Comments related to impacts to private land, Army Corps of Engineers Section 404 permits and issuance of non-exclusive ROWs in specific areas of the BLM Grand Junction District.

Table 1. PUBLIC SCOPING MEETINGS

Date (1979)	Location
August 15[a]	Santa Fe, NM
August 21[a]	Denver, CO
August 22	Grand Junction, CO
August 23	Durango, CO
August 28[a]	Salt Lake City, UT
August 28	Rock Springs, WY
August 29	Moab, UT
August 30	Vernal, UT
August 30[a]	Cheyenne, WY
November 6	Nageezi, NM (Navajo Tribe)
November 7	Ojo Encino, NM (Navajo Tribe)
November 13	Santa Ana Pueblo, NM
November 13	Zia Pueblo, NM
November 27	Ignacio, CO (So. Ute Tribe)

[a]Afternoon and evening sessions were held at these locations.

Durango, CO

The scoping meeting in Durango, Colorado was open to the general public and 10 individuals attended. Comments dealt with placing the proposed pipeline within Northwest Pipeline Company's existing ROW in the Mancos Ranger District and preliminary discussions to establish corridors by Dolores County. Other comments were of a general nature; however, the consensus was that the line had been well-routed.

Salt Lake City, UT

Two scoping meetings were held in Salt Lake City, Utah. The target groups for the first meeting were state and federal agencies. Ten individuals attended. The comments included the identification of a proposal to construct a new road in Browns Park, Utah to connect with Wyoming and Colorado, and concerns about destruction of riparian wildlife habitat in canyons. In addition, potential conflicts relating to development of oil shale, coal, road construction and water resource projects were discussed. The need for coordination between the U.S. Fish and Wildlife Service and the Utah Department of Natural Resources was stressed.

The second meeting was open to the public and 8 individuals attended. Comments received were of a general nature.

Rock Springs, WY

The scoping meeting in Rock Springs, Wyoming was open to the general public and 12 individuals attended. The primary concerns and comments involved the Little Mountain slide area, the Red Creek Badlands, and Flaming Gorge National Recreation Area (NRA). Industry representatives had general comments about the terminus point, available facilities, and conflicts with possible future proposals for other pipelines.

Moab, UT

The scoping meeting in Moab, Utah was open to the general public and 12 individuals attended. A concern was raised regarding the narrowness of Moab Canyon which is already used for several other ROWs. The principle comments related to water quality, the Moab wetlands and surface protection. Surface protection concerns included blading, stockpiling topsoil, double ditching in order to save topsoil, and construction practices to minimize erosion.

Vernal, UT

The scoping meeting in Vernal, Utah was open to the general public and 12 individuals attended. Comments received dealt with impacts to paleontological resources and existing studies of these were discussed. In addition, paralleling Northwest's pipeline across the Flaming Gorge NRA was discussed.

Cheyenne, WY

Two scoping meetings were held in Cheyenne, Wyoming. The target groups for the first meeting were state and federal agencies. Ten individuals attended the meeting. Many general comments were obtained. Specific concerns dealt with the U.S. Fish and Wildlife Service Threatened and Endangered Species Consultations for black-footed ferret, pipeline construction at Green River crossings, water rights and routing concerns. Cultural, historical and archeological concerns were also raised, specifically the suggestion of slip-boring under any existing historical sites in order to minimize surface disturbance.

The second meeting was open to the general public and 7 people attended. The need for a LHC pipeline was stressed and other general comments were received.

Nageezi and Ojo Encino, NM (Navajo Indian)

Scoping meetings were held with the Navajo Indian Tribe at Chapter Houses in Nageezi and Ojo Encino. Sixty people attended the meeting at Nageezi and 25-30 people attended at Ojo Encino. Concerns relating to easement consent and payment were of primary concern. Other comments dealt with historic and archeological concerns, the possibility of tapping into the line and revegetation practices.

Santa Ana Pueblo, NM

A scoping meeting was held for the Santa Ana Pueblo Indian Tribal government. The administrative officer of the Santa Ana Pueblo was present. The principle concerns were pipeline ruptures and potential resultant damage to livestock, crops and the health and safety of the pueblo residents.

Zia Pueblo, NM

A scoping meeting was held for the Zia Indian Pueblo Tribal government. The Pueblo administrator and assistant were present. The tribes principal comments related to historical

and archeological concerns, pipeline ruptures, reclamation, erosion control and relationship of the proposed pipeline to the proposed Shell CO_2 pipeline.

Ignacio, CO

A scoping meeting was held for the Southern Ute Indian Tribe in Ignacio, Colorado. The chairman and 8 councilmen were present. Reclamation was of primary concern. General concerns regarding wildlife and cultural resources were expressed. Other general comments were provided.

Tri-State Alternatives

Routing in the tri-state area (northwestern Colorado, northeastern Utah and southern Wyoming) was the most difficult problem identified during the scoping process. Six special meetings[a], numerous personal and telephone communications, and several on-ground and aerial reconnaisance trips were conducted in an effort to identify the most environmentally reasonable alternatives for detailed analysis.

In these areas, numerous potential resource and land use conflicts exist which inhibited the identification of a single alternative satisfactory to the many BLM and FS specialists and managers involved. The primary sources of potential conflict are:

- unstable and erosive soils (CO, UT, WY)
- Little Mountain mudslide (WY)
- potential Areas of Critical Environmental Concern (ACEC) due to fragile soils and critical watershed (Red Creek Badlands) (WY)
- crucial wildlife use areas (CO, UT, WY)
- Flaming Gorge Reservoir and National Recreation Area (WY)
- Visual Resource conflicts and easements (UT)
- Wild and Scenic River Study Area (Green River, UT)
- Cultural Resource conflicts (CO)
- Threatened or Endangered Species (CO, UT)
- ROW grant through Browns Park in Utah may provide further justification to a proposed road paving project (UT)
- potential increased sedimentation in the Green River may disturb a Blue Ribbon trout fishing area and may increase salinity of Green River water delivered to Mexico (UT)

Summary

In addition to the issues identified in the tri-state area, several other key issues of concern were identified during the scoping process:

- potential conflict with single-use purpose of Arches National Park in Utah
- narrowness of Moab Canyon (UT) with respect to present and future demand for ROW grants through the canyon
- potential disturbance of wildlife habitat due to the crossing of the Colorado River and the Moab Wetlands, UT
- potential landslide areas in Baxter and Douglas passes
- potential resource conflicts due to traversing Canon Pintado Historic District located north of Douglas Pass
- potential conflicts due to crossings of proposed or designated National Scenic and Historic Trails
- potential disturbance of riparian habitat
- potential cumulative impacts and conflicts with other proposed and existing projects
- potential disturbance of Indian grave sites
- concern for pipeline spill effects and safety
- potential conflict with paleontological resources
- concern that the EIS process would take longer than necessary and cause undue delay in getting a much needed transportation system operational
- Proposed water development projects (White River Dam, UT, Animas-La Plata Project, CO)
- Wild and Scenic River Study Areas (Dolores River, CO)
- potential conflicts with threatened or endangered species

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[a] Summaries of these meetings and numerous contact reports are on file at BLM, NMSO.

- potential impacts to crucial wildlife habitat (game species)

As a result of the scoping process, MAPCO revised its proposed action to reflect five changes in the original route:

1. Instead of skirting Arches National Park by the shortest feasible route, the applicant would continue north from Moab Canyon following a highway to just south of Thompson, Utah before turning east.

2. Instead of using Douglas Pass, the applicant proposes to traverse Baxter Pass.

3. Instead of using Sears Creek and Red Creek canyons as access through northeastern Utah, the applicant proposes the use of Rye Grass and Jesse Ewing canyons.

4. Instead of going through the proposed South Haystack strip mine (WY), the applicant proposes that the Northwest Gathering Line skirt the involved area to the south (Map 18, MP NWL 10).

5. Instead of crossing the Green River at the southern outskirts of the City of Green River (WY), which is in a crowded corridor near a developed recreation area, the applicant proposes crossing the river at Davis Bottom at the north end of Flaming Gorge National Recreation Area, above the reservoir level (Map 15, MP WL 10-11).

Since publication of the DEIS, MAPCO has revised its proposed action near Bloomfield, New Mexico (see Appendix A, Map A-1). In addition to this specific revision, MAPCO has proposed specific placement of the pipeline in both Moab and Jesse Ewing Canyons. These specific locations are shown in Maps A-2 and A-3 of Appendix A, respectively. Map A-3 also shows the proposed locations of the East of Little Mountain alternative (proposed action) and the Pine Mountain alternative.

SUMMARY OF PUBLIC PARTICIPATION ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The DEIS (Int DES-80-25) was filed with the Environmental Protection Agency on April 21, 1980 and notices appeared in Federal Register Vol. 45, No. 82 Friday, April 25, 1980 and Vol. 45, No. 87, Friday, May 2, 1980. Numerous public notices were distributed announcing issuance of the DEIS and notices of the public hearings. Approximately 1000 copies of the DEIS were distributed by mail to various individuals, organizations, and government agencies. In addition, there were copies available at 40 different public libraries and the BLM and FS offices along the route.

During the public comment period (April 21 to June 16, 1980) several public meetings and formal public hearings were conducted to solicit public advice and comments regarding the proposed action and alternatives. Summaries of meetings and presentations of comments and responses follow.

Public Hearings

Public hearings were held to gather public views about the adequacy of the DEIS and the alternatives presented therein. Particulars of the hearings are summarized below. Specific comments and responses are contained in the Comment and Response section.

Santa Fe, New Mexico - May 19, 1980

No written or oral comments were received.

Grand Junction, Colorado - May 20, 1980

No written or oral comments were received.

Vernal, Utah - May 21, 1980

No written or oral comments were received.

Rock Springs, Wyoming - May 22, 1980

Oral comments received from 6 individuals focused mainly on two issue; objection to the agencies preferred alternative of the Pine Mountain alternative and the lack of timely distribution of the DEIS in the Rock Springs area. Objections to the Pine Mountain alternative were based on the use of the forest and the opening of an otherwise virgin area containg important wildlife habitat. Questions were raised about the difficulty of repairing the pipeline during the winter in the event of a rupture. Requests were made for an extension of the comment period on the DEIS based on the fact that interested individuals and organizations which normally receive BLM EISs had not received this DEIS. A request was made to not cross the Green River in the Scott Bottom area near the town of Green River.

Farmington, New Mexico - May 29, 1980

Oral comments received from 9 individuals focused mainly on issues relating to the use of private lands. Affected landowners expressed concern that many of them had not yet been contacted by the applicant. Problems were raised about the BLM's practice of following existing ROWs with new ROW proposals. Requests were made for consideration of private lands in corridor planning. Concerns were expressed about restoration requirements and the consequences of ruptures. A desire for more information about the precise location of the proposal and a list of affected landowners was also expressed.

Rock Springs, Wyoming Meeting - June 3, 1980

An informal public meeting was held at the Rock Springs District Office on June 3, 1980. Approximately 60 individuals were in attendance. A description of the proposal and alternatives was presented by the district staff. Primarily, discussion centered around concerns regarding the selection of the agencies' preferred alternative of Pine Mountain in the DEIS. An alternative was

suggested which would cross the Green River at Browns Park (UT) and then follow Colorado Route 318 through Irish Canyon (CO) to the Wyoming border. After entering Wyoming, the route would follow Wyoming Highway 430. The relative merits of this alternative, the proposed action (East of Little Mountain) and the preferred alternative (Pine Mountain) were then discussed.

Agencies Consulted

Advisory Council on Historic Preservation

Colorado

- A-95 Clearing Houses
- Department of Health
- Department of Highways
- Department of Water Resources
  - Durango
  - Steamboat Springs
- Division of Wildlife Offices
  - Denver
  - Ft. Collins
  - Montrose
- Geological Survey
- Historical Society
- State Historic Preservation Officer

Department of Agriculture

- Forest Service Offices
  - Rocky Mountain Region, Denver, CO
  - Intermountain Region, Ogden, UT
  - Ashley National Forest, Vernal, UT
  - San Juan National Forest, Durango, CO
- Soil Conservation Service Offices
  - Albuquerque, NM
  - Casper, WY
  - Cheyenne, WY
  - Cortez, CO
  - Craig, CO
  - Denver, CO
  - Evanston, WY
  - Norwood, CO
  - Rock Springs, WY
  - Salt Lake City, UT
  - Temple, TX

Department of the Interior

- Bureau of Indian Affairs
- Bureau of Land Management
  - New Mexico State Office

Department of the Interior (continued)

- Roswell District
- Albuquerque District
  - Farmington Resource Area
  - Taos Resource Area
- Colorado State Office
  - Montrose District
    - Durango Resource Area
  - Grand Junction District
  - Craig District
    - White River Resource Area
- Utah State Office
  - Moab District
    - Monticello Resource Area
  - Vernal District
  - Salt Lake District
- Wyoming State Office
  - Rock Springs District
    - Kemmerer Resource Area
  - Rawlins District

Water and Power Resources Service
- Durango, CO
- Manila, UT
- Salt Lake City, UT

Heritage Conservation and Recreation Service
- Regional Office, Albuquerque, NM
- Regional Office, Denver, CO

National Park Service
- Denver Service Center, Denver, CO
- Rocky Mtn. Regional Office, Denver, CO
- Southwest Regional Office, Santa Fe, NM
- Arches National Park
- Canyonlands National Park
- Dinosaur National Monument
- Mesa Verde National Park

Office of Environmental Project Review, Washington, D.C.

U.S. Fish and Wildlife Service
- Regional Office, Albuquerque, NM
- Regional Office, Denver, CO
- Denver Wildlife Research Center Field Station, Ft. Collins, CO
- Albuquerque Area Office
- Cheyenne Area Office
- Denver Area Office
- Pierre, SD Office
- Rapid City, SD Office
- Salt Lake City Area Office

U.S. Fish and Wildlife Service, Endangered Species Recovery Teams
- Bald Eagle Recovery Team (northern states), Fargo, ND
- Bald Eagle Recovery Team (southwest region), Phoenix, AZ
- Black-Footed Ferret Recovery Team, Brookings, SD
- Colorado River Fishes Recovery Team, Salt Lake City, UT

Department of the Interior (continued)

Rio Grande Fishes Recovery Team, Austin, TX
U.S. Geological Survey
Albuquerque, NM
Grand Junction, CO
Moab, UT
Vernal, UT

Department of Transportation

Federal Energy Regulatory Commission

Environmental Protection Agency

Region VI Office, Dallas, TX
Region VIII Office, Denver, CO

New Mexico

A-95 Clearing Houses
Department of Game and Fish, Santa Fe
Environmental Improvement Division
Natural Resources Department
State Archaeologist
State Heritage Program, Santa Fe
State Highway Department
State Historic Preservation Officer
State Land Office
Soil and Water Conservation Districts

Texas Parks and Wildlife Department State Historic Preservation Officer

U.S. Army Corps of Engineers

Albuquerque District, NM
Sacramento District, CA
Grand Junction Field Office

Universities and Colleges

Colorado College, Colorado Springs, CO
Colorado State University, Ft. Collins, CO
Eastern New Mexico University, Portales, NM
Ft. Lewis College, Durango, CO
Utah State University, Logan, UT

Utah

A-95 Clearing Houses
Bureau of Water Pollution Control

Utah (Continued)

- Department of Planning
- Division of Natural Resources
- Division of Oil and Gas Mining
- Division of Water Resources
- Division of Wildlife Resources Offices
  - Ogden
  - Price
  - Salt Lake City
  - Vernal
- S.E. Utah Association of Governments
- State Highway Department
- State Historic Preservation Officer
- Utah Council of Governments

Wyoming

- A-95 Clearing Houses
- Department of Environmental Quality, Cheyenne
- Game and Fish Department Offices
  - Cheyenne
  - Green River
  - Pinedale
- Recreational Commission
- State Conservation Commission
- State Engineer
- State Historic Preservation Officer
- Water Development Program

Comments and Responses

During the comment period (April 21 to June 16, 1980) 102 letters from the public and agencies were received. Individuals or organizations who sent letters are listed in Table 2. Table 3 lists the 15 speakers at the public hearings. All letters are reproduced here in their entirety. The responses are presented adjacent to the comments in each letter.

Responses have been made to all substantive comments presented in the letters and hearings transcripts. Substantive comments were considered to be those which addressed either the adequacy of the DEIS or the merits of the alternatives or both. Comments received after the deadline for inclusion in this FEIS will be responded to by letter and will receive full consideration in the final decision.

Table 2. COMMENT LETTERS RECEIVED

Assigned Number In Order of Receipt	Name of Commentor
1	Soil Conservation Service, Denver Colo.
2	Mountain Fuel Supply Company
3	State of Wyoming Oil and Gas Conservation Commission
4	American Quasar Petroleum Company
5	Craig Thompson - hearing request
6	Continental Divide Trail Society
7	Tooele County Wildlife Federation
8	Bureau of Indian Affairs, Window Rock, Arizona
9	Montezuma County, Colorado
10	Lloyd Pierson
11	Amoco
12	Craig Thompson
13	International Society for the Protection of Mustangs and Burros
14	Department of Housing and Urban Development Denver, Colorado
15	Colorado Clearing House a) Division of Disaster Emergency Services b) Colorado Historical Society c) Department of Local Affairs d) Colorado Division of Planning, Office of Energy Conservation e) Colorado State Department of Highways f) Division of Water Resources
16	Cities Service Company
17	Defenders of Wildlife, North Central, Rock Springs, Wyoming
18	U.S. Army Corps of Engineers, Sacramento, California
19	Heritage Conservation and Recreation Service, South Central Region
20	Environmental Protection Agency, Regions VIII and VI
21	Department of Health, Education and Welfare, Atlanta, Georgia

Table 2. COMMENT LETTERS RECEIVED (Continued)

Assigned Number In Order of Receipt	Name of Commentor
22	Department of Health and Human Services, Region VIII
23	William Baurley
24	Northwest Pipeline Corporation
25	Lee Roger Taylor, Jr.
26	Rev. Ken Wiener
27	Water and Power Resources Service, Upper Colorado Region
28	Chris E. Hanson
29	Barry S. Kues, University of New Mexico
30	U.S. Geological Survey, Reston, Virginia
31	Paul and Jean Thompson
32	State of Utah, Division of State History
33	Wilderness Workshop of the Colorado Open Space Council
34	Wyoming Wildlife Federation
35	U.S. Department of Commerce, Washington, D.C.
36	State of Wyoming, Commissioner of Public Lands and Farm Loans
37	Soil Conservation Service, Temple, Texas
38	National Wildlife Federation, Boulder Colorado
39	Tom Polk
40	Beth Walker
41	Sue Schock
42	Katharine B. Collins
43	Kaye Bamesberger
44	Randy Bamesberger
45	Pat Pulley
46	Jim Huyck
47	Olive Anne Freeman
48	John D. Collins
49	Barbara Thompson
50	Mary and Daniel LaPointe
51	Cheryl D. Sharma
52	Maribeth Harrison
53	Gordon Grant
54	Mr. and Mrs. Jerry Guille

Table 2. COMMENT LETTERS RECEIVED (Continued)

Assigned Number In Order of Receipt	Name of Commentor
55	Dale and Debbie Houghtoling
56	Mick Roich
57	Lucille Geargis
58	Lloyd A. Carrell
59	Paula Thompson
60	Jack Hansen
61	Patricia Ann Mathes
62	Office of Governor of Texas a) Texas Department of Water Resources b) State Department of Highways and Public Transportation c) Railroad Commission, Gas and Utilities Division d) Texas Forest Service e) Parks and Wildlife Department
63	Robert Wiza
64	Defenders of Wildlife, North Central
65	Craig Thompson
66	Ellen Gilbreth
67	Steven Greb
68	Colorado Clearing House a) Department of Health
69	Division of Wildlife, Colorado
70	Fish and Wildlife Service, Albuquerque, New Mexico
71	State of Utah, Department of Health
72	Mr. and Mrs. Asmo Ranta
73	Cheryl Confer
74	Donna Weber
75	Gil Marsh
76	Bowhunters of Wyoming, Inc.
77	Shari Hahn
78	Mrs. John Kowlok
79	Gregory T. Toth
80	James C. Aumiller, Western Wyoming College
81	David Kathka
82	Dennis and Beth Hurley-Freeman
83	Mrs. John W. Wallace
84	W. Michael Gear
85	Champlin Petroleum Co.
86	Anna Gazewood
87	Petition with 32 signatures
88	Petition with 47 signatures
89	Mountain Fuel Supply Company
90	Kathleen Schwartz, Wesly Harvey

Table 2. COMMENT LETTERS RECEIVED (Concluded)

Assigned Number In Order of Receipt	Name of Commentor
91	Julie and Leslie Farr
92	Carolyn Harrison Carollo
93	Kurt and Jeanette Jackman
94	Janice C. Newberry
95	Bertrand de Pajer
96	Stanley K. Costantino
97	Jo and Robert Larson
98	Soil Conservation Service, Salt Lake City, Utah
99	Sweetwater County Wildlife Association
100	Wyoming a) Wyoming State Highway Department b) Department of Environmental Quality
101	State of Utah a) Division of Wildlife Resources
102	D.W. King

Table 3. PUBLIC HEARING AND MEETING SPEAKERS

Speaker Index Number	Name	Meeting Location
1	Craig D. Thompson[a]	Rock Springs, Wyoming
2	Jack Pugh[a]	Rock Springs, Wyoming
3	John Borzea[a]	Rock Springs, Wyoming
4	Dick Randall[a]	Rock Springs, Wyoming
5	John Anselmi[a]	Rock Springs, Wyoming
6	Rex Headd[b]	Rock Springs, Wyoming
7	Jack Scott	Farmington, New Mexico
8	F.F. Montoya	Farmington, New Mexico
9	John Horvath	Farmington, New Mexico
10	Jack Ward	Farmington, New Mexico
11	Jack Curtis	Farmington, New Mexico
12	Bob Browning	Farmington, New Mexico
13	John Scott	Farmington, New Mexico
14	Edwin Kaime	Farmington, New Mexico
15	Stella Montoya	Farmington, New Mexico

[a] Responses to comments from the Rock Springs Hearing are contained in letters 12 and 17. All substantive comments from the speakers are responded to adjacent to those letters.

[b] Comments made by Mr. Headd were reiterated in letter 89 and are responded to after that letter.

1

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
P. O. Box 17107, Denver, Co 80217

April 29, 1980

Arthur W. Zimmerman
State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Zimmerman:

We have reviewed the Draft Environmental Impact Statement for the proposed MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline.

The statement appears to be concise and well prepared.

(1) We thought the rationale for determining that impacts to vegetation were insignificant was questionable. It appears that loss of vegetation for grazing use on over 7000 acres even for one or two years is significant and could have been recognized.

Thank you for the opportunity to review the EIS.

Sincerely,

Sheldon G. Boone
State Conservationist

cc: Norman Berg, Administrator, SCS, Washington DC
Director, Environmental Services Division, SCS, Washington D.C.
Kenneth L Williams, Director, WTSC, SCS, Portland, Oregon
Office of Environmental Review, EPA, Washington D.C.

(1) The criterion for determining the significance of impacts to livestock grazing is listed on page 3-4 of the DEIS. It states impacts to livestock grazing would have been considered significant if construction of the project would result in a concentrated loss of production within any single grazing unit.

The loss of an estimated total of 650 AUMs of production would result from project-related vegetation destruction over a period of 1 to 2 years following construction. Since this number of AUMs would be distributed over the length of 1172 miles, and the loss would not be concentrated in one allotment or area, the loss of AUMs was not considered a significant impact.

MOUNTAIN FUEL SUPPLY COMPANY

JOHN CRAWFORD JR.

May 8, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Gentlemen:

Re: MAPCO's Rocky Mountain Liquid Hydrocarbon Pipeline, Draft Environmental Impact Statement, April 1980

Mountain Fuel Supply Company would like to take this opportunity to comment on MAPCO's proposed Rocky Mountain liquid hydrocarbon pipeline.

In recognizing the great need for additional domestic supplies of liquid hydrocarbons and means of transporting those hydrocarbons from the Rocky Mountain region to better market areas, Mountain Fuel Supply Company supports MAPCO's liquid hydrocarbon pipeline proposal as presented to the Department of the Interior and the Bureau of Land Management.

The necessity for a pipeline in the Rocky Mountain area is readily apparent. Mountain Fuel Supply Company, in anticipation of MAPCO's proposed pipeline, has committed a portion of its hydrocarbon liquids to the planned pipeline project.

As indicated in the Draft Environmental Impact Statement, a majority of MAPCO's contemplated pipeline already runs within or adjacent to existing rights-of-way and would, therefore, have little or no additional environmental impact.

In light of the minimal environmental impact anticipated by the proposed pipeline and the need for a pipeline in the Rocky Mountain region, Mountain Fuel Supply Company urges the approval of MAPCO's pipeline project.

Very truly yours,

John Crawford

JCJ:kmt

CHAIRMAN
GOVERNOR ED HERSCHLER

COMMISSIONERS
OSCAR E. SWAN
BERN WHITTAKER
RICHARD S. CROSS
DANIEL M. MILLER JR.

The State of Wyoming

OFFICE OF
OIL AND GAS CONSERVATION COMMISSION
STATE OIL AND GAS SUPERVISOR
123 SOUTH DURBIN
P. O. BOX 2640
CASPER
82602

STATE OIL AND GAS SUPERVISOR
DONALD B. BASKO

EX OFFICIO DIRECTOR OF
OIL AND GAS CONSERVATION

May 9, 1980

State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, NM 87501

Re: The Mapco Rocky Mountain
Liquid Hydrocarbon Pipeline

Gentlemen:

I have had the opportunity to review the Bureau of Land Management's Environmental Impact Statement concerning the above-noted proposed pipeline, part of which will run through portions of Southwest Wyoming.

The pipeline was conceived as being necessary because of some of the significant oil and gas discoveries that have been made in that portion of our State. I think that there is little argument that buried pipelines are the safest, least expensive, and most environmentally acceptable means of moving large volumes of hydrocarbons from one point to another.

Amoco Production Company has made a discovery in what they are calling Whitney Canyon, and Chevron Oil Company has a discovery in Carter Creek. Both companies propose to build a tremendous gas processing facility which will generate thousands of tons of sulphur, millions of cubic feet of sweet gas for resale, and approximately 17,000 barrels per day of LNG liquids. The figure quoted above is initial production estimates, which could be increased significantly from the initial discoveries by further development in the fields mentioned. 17,000 barrels of LNG liquids would require 80 truck loads to move, creating a tremendous impact of dust, traffic, road hazards, and air pollution from the vehicle engines. As the field expands, this figure could easily double with the resultant increase in truck traffic.

In addition to the two fields already confirmed, there are numerous other prospects for which there is significant encouragement that may develop into producing areas and approximately 40 rigs operating in the Overthrust Belt right now searching for new reserves.

When all things are considered, I sincerely hope that the proposed project is approved.

Very truly yours,

Donald B. Basko

Donald B. Basko,
State Oil and Gas Supervisor

DBB:wal

cc: State Planning Coordinator's Office, Cheyenne, Wyoming

AMERICAN QUASAR PETROLEUM CO.
2500 FORT WORTH NATIONAL BANK BUILDING · FORT WORTH · TEXAS 76102 U.S.A.
Telephone (817) 335-4701

May 12, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

This has reference to the Draft Environmental Impact Statement on MAPCO'S Rocky Mountain Liquid Hydrocarbons Pipeline. As the holder of one of the largest acreage positions in the Overthrust area of Utah, Idaho, Montana, and Wyoming, as well as the discoverer of the Pineview Field (which was responsible for the current interest in exploration for oil and gas in this province), we wish to urge your early concurrence with MAPCO'S plans.

As is noted in the EIS, NGL production in this area will expand greatly within the next few years, overwhelming the ability of the local area to absorb the product produced. As producers we do not have the option of not removing most of the NGL's from the gas stream due to the contractual and operating requirements of the natural gas pipelines. If the pipeline is not built, then, we would have to move the products either by truck or rail, either of which would impact the environment to a much greater degree than the construction and operation of the proposed pipeline.

With regard to MAPCO, we have been involved with their operations for several years and have always found them to be very prudent in the construction and operation of their lines. We would expect nothing different on this line.

In closing, we again urge your early concurrence with MAPCO'S proposal.

Sincerely,

Gordon L. Cornell
Vice President

GLC/p

CC: Mr. Eugene G. Bell

State Director

Bureau of Land Management
Box 1449
Santa Fe, New Mexico
87501

Dear Sir:

I am currently reviewing the Mapco Rocky Mountain Liquid Hydrocarbons Pipeline Draft Environmental Impact Statement.

I wish to comment at the Rock Springs public meeting on May 22. Unfortunately, the meeting conflicts with another public lecture, a speech by one of the worlds foremost energy experts- Amory Lovinr. He will speak at Western Wyoming College and as I have been instrumental in arranging for his visit,I will be introducing him.

I would like to request that I be heard immediately after the meeting convenes or that the meeting be kept open until I am able to return, which I anticipate would be about 9.30 P.M.

I am a landowner in southern Sweetwater County and this is a matter of great concern to me.

Thank you for your consideration.

Sincereley,

Craig D. Thompson

1241 Palisades
Rock Springs, Wy.
82901

Continental Divide Trail Society

P.O. BOX 30002 WASHINGTON D.C. 20014

May 13, 1980

Mr. Arthur W. Zimmerman
State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Zimmerman:

We have reviewed the draft environmental statement for MAPCO's Rocky Mountain Liquid Hydrocarbone Pipeline, reference 1792 (922).

We regret that the EIS fails to take into account any possible impacts upon the Continental Divide National Scenic Trail. Nevertheless, in our judgment the proposed location of the pipeline, near Ojo Encino, as shown on Map 7, would in fact have minimal effects upon the Trail. We should like to have the opportunity to comment further, however, should there be any changes of location in proximity to the Continental Divide.

Very truly yours,

James R. Wolf
Director

Tooele County

16 May 1980

Wildlife Federation

BOX 223 PHONE 882 2345 TOOELE, UTAH 84074

State Director BLM
P.O. Box 1449
Santa Fe, New Mexico

Dear Sir:

I have reviewed the EIS draft on MAPCO's Rocky Mountain liquid Hydrocarbon Pipeline

I have no questions or adverse comments. The statement appears to be well drafted, comprehensive and detailed.

I do not believe the pipeline construction will have any significant measurable impact on wildlife habitat.

Chris Demetler
Sec'ty Tooele County
Wildlife Federation

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Navajo Area Office
Window Rock, Arizona 86515

IN REPLY REFER TO:
Environmental Quality

MAY 1 8 1986

State Director (922)
Bureau of Land Management
Post Office Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

The draft environmental impact statement for MPACO's Rocky Mountain Liquid Hydrocarbon Pipeline has been reviewed by our office.

We respectfully submit the following comments for your consideration.

(1) Page 1-2: Bureau of Indian Affairs (BIA). This section makes no mention of Navajo Indian Allotted Trust lands which the proposed project crosses.

(2) What considerations, if any, are made for crossing the main canal (section 35, T28N, R11W) which supplies irrigation water for the Navajo Indian Irrigation Project?

(3) Map 7 of 18: The W½ section 1, T28N, R8W is Navajo Allotted Trust land, not State land. (West of SR44 at Nageezi.)

(4) Map 6 of 18: The following Indian allotted Trust lands are indicated to be BLM or Private lands on this map.

S½ and NE¼, Section 19, T20N, R5W
Section 23, 24, 25, and 26, T20N, R5W
NW¼ Section 1, T18N, R4W
Section 17, T18N, R4W
W½ Section 20, T18N, R4W

If you have any questions regarding the land status in this area, please contact Mr. Tom Lynch, Area Real Property Management Officer, Window Rock, Arizona 86515, Telephone (602) 871-5151 Extension 5334.

Sincerely yours,

ACTING

Area Director

(1) The appropriate text change has been made.

(2) MAPCO proposes to bore underneath (tunnel) the canal. This would be similar to the technique used to cross railroads and highways (see DEIS page 1-20). Notification of construction is discussed on DEIS page 1-15.

(3) The strip maps contained in Appendix A of the DEIS only show the land status for lands that would be crossed by the proposed project. The W1/2 Section 1, T28N, R8W would not be crossed by the project.

(4) As stated in 3 above, status is only shown for those lands which would be crossed. After rechecking, only Sections 23, 24, 25 T20N, R5W would be crossed and these were shown as Navajo Indian Trust Lands in the DEIS.

MONTEZUMA COUNTY
Administrative Office
Montezuma County Courthouse Rm. 302
Cortez, Colorado 81321 *303-565-8317*

May 20, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Re:MAPCO'S Rocky Mountain
Liquid Hydrocarbons Pipeline
Draft Environmental Impact
Statement

Dear Sir:

Please find enclosed a Memorandum of response on the above named subject. The Boards of County Commissioners of both Dolores and Montezuma County have reviewed said response and approved same.

We note that no public hearing on the statement is scheduled for southwestern Colorado. When considering the amount of private land crossed and the interest being generated, a hearing in Cortez or Durango may be advisable. Our counties are not necessarily requesting such a hearing as our concerns will be addressed in our permit granting process which calls for a public hearing.

Very truly yours,

David M. Denton
Administrative Assistant

DMD/gb
Encl.

MEMORANDUM

Draft E.I.S. Response

SUBJECT: MAPCO'S Rocky Mountain
Liquid Hydrocarbons Pipeline
Draft E.I.S.

TO: Department of Interior
Bureau of Land Management

FROM: Montezuma and Dolores Counties, Colorado

The construction of this proposed facility in Montezuma and Dolores Counties will require a "Location and Construction" permit from each county. The Environmental Impact Statement should supply certain portions of the required supporting documents for consideration of an application for such permits.

(1) Our main concern is that the Socio-Economic impact of the pipeline is not adequately addressed. Some of the factors we believe to be necessarily covered are as follows:

1. Crop losses during construction and reclamation.

2. Tax Base.

3. Minerals and other natural resources lost.

4. The effects of the R.O.W. on mineral leasing.

5. O & M expenditures in various localities.

It would seem that the construction methods are not complete. However, that will not be of significant concern to Montezuma and Dolores Counties as it will be covered in their permit reviews.

(1) The concerns expressed by Montezuma and Dolores counties were analyzed in the environmental analysis process; pages 3-1 to 3-5 of the DEIS describe the criteria by which these analyses were guided. Exclusion of the analysis from the DEIS was based on the determination that these various impacts would not be significant. Explanation of why the impacts would be insignificant follows.

1. Crop losses resulting from construction and reclamation would be a matter of dollar negotiation between the applicant and private landowner.

2. Tax bases would not be significantly impacted because the ROW would only affect use, not ownership. Consequently, the tax base would not be changed. Estimated annual taxes for the project would be $750,000. Upon allocation to states and counties, the amount would not provide a significant increase to any jurisdiction.

3. No minerals would change ownership and the ROW would not affect claims or patents. The small amount of timber of commercial value would be sold after clearing, and the amount of grazing lost is not significant in any one area.

4. The ROW would have an effect on BLM leasing of minerals during the term of operation of the pipeline but only within the width of the ROW which would be no more than 50 feet.

5. Expenditures for operation and maintenance were examined. The yearly operation and maintenance budget for the pipeline project is estimated to be from about 1 million dollars the first year to about 8 million dollars a year after the 10 pump stations are operating. This would be divided among the four states and 28 counties involved. The yearly amounts, when compared to local area income and net expenditures, would be extremely small and, therefore, insignificant.

Box 621, Moab, Utah 84532
5/22/80

State Director, BLM
PO Box 1449
Santa Fe, New Mexico 87501

Sir:

I should like to comment on the draft EIS of MAPCO's Rocky Mountain pipeline.

(1) 1. A 50 foot ROW is indicated and it is stated that 90% of the lin e will parallel in place ROW pipeline. No where does it indicate the conformity of one pipeline to the other, whether they will be on one side of the other and if there is or not an overlap in the present and proposed ROW's. Inasmuch as there are other proposals to ~~k~~ use the corridor it would make the most sense to place the pipes within 15 feet of each other in the ground and overlap the ROW's, otherwise the next pipeline will have to go some other route or destroy important historic and scientific values in Spanish Valley and elsewhere.

(2) 2. Your statement on cultural resources on page 3-8 doesn't make too much sense. What will the MOA be? If you intend to allow the applicant to make your decisions you are avoiding your responsibilities and allowing the destruction of the cultural resources. Nothing here guarantees that these resources will not be adversely impacted.

(3) 3. Page 3-15 indicates you are going to sacrifice the somewhat impacted yet still highly important scenic area at Kane Springs. The Kane Springs and environs are a highly significant historical area. In the area are the ~~xxxx~~ remains of two historic roads, one of which may be on the route of the Spanish Trail dating back to 1765. Kane Springs itself was an important stop on that trail which was in use during the 18th, 19th and 20th centuries as the primary route from Spanish Valley to Santa Fe and the San Juan. As such no more impact should take place. Careful analysis by engineers and landscape architects will show you that a slight jog to the west over and around Bridger Jack Mesa and then down a somewhat hidden side canyon so the west of the present cut will help to hide the pipeline and provide as good access. The pipeline should trend westward at the top of Blue Hill and follow some present primitive road already in place causing little observable destruction and little loss of grass.

(4) 4. The proposal to use Baxter Pass instead of already impacted Douglas Pass is unacceptable. Much of the road in the Baxter Pass route is the road bed of the Uintah Railroad, an important part of our historic past in this area. In addition there are several ghost towns and historic gilsonite mines that will recieve both direct and indirect impacts from the use of this route. Further the crossing of the White River has an important historic site, the Ignacio Stage stop and there are many archeological sites in this area. With the loss of many sites ~~xxx~~ in the region due to oil shale development it is imperative that those remaining receive double protection.

(1) The Mineral Leasing Act of 1920, as amended, allows for a ROW "not to exceed fifty feet plus the ground occupied by the pipeline." At the discretion of the Authorized Officer, the right-of-way may be less than 50 feet. If the right-of-way is granted, BLM personnel would be involved in site-specific location under ideal conditions, 2 pipelines would not be placed closer than 10 feet from one another. It is also BLM's policy to avoid cultural resource sites whenever prudent and feasible.

(2) The narrative describing the MOA has been revised in the text for clarification. Basically, the MOA outlines procedures that the BLM would use to ensure compliance with 36 CFR 800, Protection of Historic and Cultural Properties. The BLM is, and will remain responsible for compliance and protection of cultural resources.

(3) In an effort to avoid the existing cut in the Kane Springs Area MAPCO has revised its proposed route to a location further west. BLM Moab District has concurred with this relocation.

(4) Numerous considerations entered into the decision to identify Baxter Pass as the preferred alternative. The avoidance of the Canyon Pintado National Historic District, along with the crowded conditions in Douglas Pass contributed to this decision.

Although the Uintah Railroad bed has lost its historic integrity with the construction of the road, the Whiskey Creek Trestle has been placed on the National Register of Historic Places, as representative of the Railroad. The proposal would avoid this site.

Other historic sites would be avoided if prudent and feasible. Data recovery would be accomplished where avoidance is not possible.

The protection of Cultural Resources is the policy of the BLM and required by law.

Refer to the response to comment 2 of this letter which addresses BLM's responsibility.

2.

(5) 4. In writing the MOA on cultural resources it must be kept in mind that many, if not most, historical sites must be avoided - they can not be salvaged nor will recording do much more than make the developer feel like they have done something. There are many minor but important sites along the pipeline and they are the few remnants that are left from many that have been destroyed in the past by other developments. We have very few historical sites in eastern Utah and western Colorado and New Mexicoc A major effort must be made to save these - important sites and visual resource jewels.

Lloyd M. Pierson
Private Consulting Cultural Resource Specialist.

(5) BLM policy is to avoid cultural resources whenever prudent and feasible. This policy has been incorporated into the proposed MOA described in Chapter 1, page 1-26 of the DEIS.

Amoco Oil Company
General Office
200 East Randolph Drive
Chicago, Illinois 60680
(312) 856 2202

L. O. Thomas
Executive Vice President

May 28, 1980

Staff Director (922)
Bureau of Land Management
Post Office Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

EIS for MAPCO's Pipeline

Amoco Oil Company, as a shipper of natural gas liquids (NGLs) from the Rocky Mountain Overthrust area, supports the timely construction and operation of MAPCO's proposed pipeline to Hobbs Station, Texas.

The discovery of significant reserves of natural gas and associated NGL's in the Rocky Mountain Overthrust area is a positive step in the President's goal to reduce our dependence on foreign sources of petroleum. The available NGL's exceed the local market demand; hence, an efficient, dependable transportation system to other U.S. markets is necessary for the nation to benefit from these new discoveries. Construction of the proposed MAPCO system will provide this critical NGL transportation link to those markets and result in a reduction in total U.S. imports of foreign crude oil.

Any delay or postponement of action on MAPCO's application will only delay the benefits to the nation and frustrate the President's stated goal. Moreover, the proposed MAPCO pipeline is the most energy efficient means of transporting NGL's to the U.S. markets.

In conclusion, we recommend that MAPCO's application for permits be granted without delay. Approval will have the positive impact of increasing the nation's domestic production and lessening our dependence on uncertain foreign sources of petroleum.

Sincerely yours,

L. O. Thomas

1241 Palisades Avenue
Rock Springs, Wyoming 82901
May 28, 1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodard:

Sweetwater County, Wyoming, has over six million acres of land of which only about six thousand are forested with pine, fir, and aspen. This represents around 0.1% of the total surface area. I find it inconceivable that the BLM could propose re-routing the MAPCO pipeline out of an existing pipeline right-of-way utility corridor and locating it over one or the other of the two forested mountains in our county.

I have reviewed the MAPCO EIS and have numerous comments and many questions. For purposes of clarification, I shall summarize my comments in five areas listed below and shall state my questions in the latter part of this letter.

I. The EIS did not address a sufficient number of alternatives.

II. The EIS is not consistent with the management framework plan.

III. The EIS did not take into full account operational problems particularly with regard to winter maintenance.

IV. The EIS did not support sufficiently the denial of consideration of alternative nos. 5 and 7 and the company's chosen route.

V. The EIS did not address the magnitude of environmental consequences of the preferred alternatives.

IV. Questions.

Please bear in mind that my comments will address primarily the routes and alternatives from milepost 800 northward—the tri-state alternatives. I do not believe that the MAPCO EIS addressed a sufficient number of alternatives in the tri-state area.

Mr. Larry Woodard
Page 2

(1) 1. The EIS did not consider in depth the alternative of following the existing Northwest Pipeline across the Flaming Gorge with another bridge or suspending the pipeline underneath the existing pipeline.

(2) 2. The EIS did not consider in depth following the company proposal (east of Little Mountain) and suspending the pipeline over the distressed areas on the south side of Little Mountain. Mountain Fuel personnel have informed me that their pipeline through this area has been in existence 30 years and must be periodically reset to account for the soils. I have personally taken the time to drive down and pace this area, and although more than one area seems to be slipping, the area of greatest concern could be bypassed by a suspension span of less than 500 yards in length. The highway engineer on the Little Mountain Highway Project agrees with me on this.

(3) 3. Proper consideration was not given to the alternative of following the canyon then following the BLM preferred alternative, Pine Mountain, but departing from it along the northeast slope of Teppe Mountain heading north along the western slope of Pine Mountain, then east up the northern slope of Pine Mountain joining the BLM proposed alternative at approximately milepost 934.

(4) 4. As recognized in the statement, page 4-4, this area is indeed the most difficult problem identified during the scoping process. I believe proper consideration was not given to crossing the Green River at Brown's Park Bridge above the water—thus mitigating visual impact because of an existing bridge and sparing the Green River increased sedimentation and decreasing the possibility of a small leak spelling disaster in the winter to an entire section of the river—then following an existing highway northeast out of the valley, heading north along highway 430 through Irish Canyon and north to milepost 50 where it intersects an existing Mountain Fuel Hiawatha pipeline right-of-way and then northwest along said right-of-way joining the Pine Mountain alternate at milepost 938 and following the alternative to South Baxter.

This alternative would not endanger the Green River trout fishery, would not affect Jeane Ewing Canyon, would follow an existing road or right-of-way allowing easy winter access and maintenance, would comply with the management framework plan and not compromise Sweetwater County's forests, and would steer clear of the slide area on Little Mountain.

(5) As for the soils instability in the Vermillion Cliffs and canyon creek area, I believe that the route Highway 430 takes through that area has experienced little if any slippage and even if it had, I feel it better to deal with an existing problem than to create the potential for a new one.

(1) The alternative of following the existing Northwest Pipeline across Flaming Gorge with another bridge or suspended from the existing bridge was considered and is identified in Table 1-10 on DEIS page 1-33 and discussed in the narrative on DEIS pages 1-36 and 37 under the heading "Dutch John, UT." This alternative was screened from detailed analysis based on Criterion 3 (DEIS p.1-32) and the following considerations:

a) The Flaming Gorge National Recreation Area (NRA) is a Congressionally established and mandated management area. The land within is dedicated primarily to recreation use and to conservation of scenic and other values. It is stated in the management plan that "conflicts between recreational or scenic values and land uses will be resolved in favor of the former."

b) Resource conflicts associated with crossing a wide span of Flaming Gorge NRA.

c) Associated rough terrain would make mitigation of impacts difficult.

d) There are technical and construction problems associated with the suspension of pipelines carrying pressurized liquids.

e) Additional length is associated with this alternative.

(2) The company had originally proposed to follow the Mountain Fuels pipeline route east of Little Mountain, but instead rerouted to avoid the area of known and active soil slippage on Little Mountain. Placing the pipeline on supports across the hazardous area would not solve the problem as the supporting pylons would also be subject to slippage. In addition, locating the pipeline above ground makes it more susceptible to vandalism which could result in ruptures.

(3) At the time of identifying and selecting reasonable alternatives to the proposed action, the primary objective was to identify a route which would avoid the fragile soils in the area. The alternative described is located in a highly erosive formation known as the Red Creek badlands. Due to the poor soils and delicate watershed, this area is being proposed as an Area of Critical Environmental Concern (ACEC).

(4) The alternative to burying the pipeline at river crossings would be to place the pipeline above the water. Placing the pipeline above water would increase the chances of a rupture as the line would be more susceptible to vandalism, ice, flood and equipment damage.

The suggested route following Highway 430 was screened from detailed analysis based on Criterion 3 (DEIS, pp 1-32 to 1-36). The following resource considerations contributed to the screening of this route.

a) Irish Canyon is a highly traveled route connecting Wyoming and Colorado, having high recreation use, including one undeveloped recreation site. The steep walled talus slopes are highly erosive and active slippage has occurred within the last 5 years. Construction through the southern portions of the canyon would be extremely difficult due to the horseshoe curves and bedrock base. Extreme concerns have been expressed about the visual impact of constructing a pipeline within the narrow canyon.

b) A route following Highway 430 would be approximately 30 miles longer than the proposed action. This would result in 182 additional acres of surface disturbance and an additional cost of approximately 2 million dollars. An additional 30 miles of disturbance would be undesirable.

c) Colorado route 318 in the area of Irish Canyon is the boundary between 2 Wilderness Inventory Units (WIUs). The Little Snake Area Manager indicated that there is considerable public interest in these units.

d) The Morrison Formation, a major fossiliferous formation, is common in the area surrounding Dinosaur National Monument. A route following Highway 430 would cross this area of known and high potential for vertebrate fossils.

e) There are indications that early inhabitants of Northern Colorado used Irish Canyon as a major migration route into southern Wyoming. This area is high in cultural and archaeological site occurrences. In addition, there are known petroglyphs found in the southern areas of Irish Canyon. Given the narrow width of the canyon, cultural resources would be difficult to avoid.

f) The BLM Craig District has implemented (through MFP decisions) a moratorium on surface disturbance and surface occupancy related to oil and gas activity in the area of Irish Canyon due to recreation values.

g) Erosive soils would make mitigation of impacts difficult, particularly north of Irish Canyon in Colorado and adjacent to Salt Wells Creek in Wyoming.

h) A route following Highway 430 would cross through the Brown's Park National Wildlife Refuge.

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(5) cont. The proposed Pine Mountain alternative could certainly create a soils slide on the south side of Pine Mountain and my consultation with a professional civil engineer verifies that the only way to anticipate this problem would be a comprehensive drill study to verify or deny the existence of a slip plane.

(6) 11. The MAPCO EIS is not consistent with the management framework plan. It is my understanding that the management framework plan is a directive to developers and to the BLM to route utilities into existing corridors whenever possible.

(7) 1. It is possible to route the MAPCO line either up highway 430 as in point no. 4 above or by using the company's proposal. The BLM preferred alternative will take the pipeline out of an existing utility corridor.

(8) 2. The Pine Mountain-Little Mountain alternatives are not existing utility corridors. The utility lines on Little Mountain consist of a single power line running almost due east-west, and the one pipeline on Pine Mountain is an abandoned, 30-year old, above ground, 4-inch Mountain Fuel line.

(9) 3. The BLM alternatives would create a new corridor through which future pipelines, power lines, coal slurry lines, etc. could be routed. This would effectively split the forested areas with little hope for a one-time impact and speedy recovery.

(10) 111. The MAPCO EIS did not take into full account operational problems particularly with regard to winter maintenance.

(11) 1. The statement on page 1-10 refers to right-of-way maintenance without defining maintenance. I assume that the right-of-way is to be restored to its original condition. If this is the case, then what maintenance is required? If this isn't the case, does the right-of-way or parts of it become roads? In an area such as Pine and Little Mountains that are heavily used for firewood gathering, hunting and camping, you cannot guarantee that parts will not become roads out of convention. We certainly don't need new roads on these mountains to disturb and intrude upon wildlife habitat.

(12) 2. No address was made as to how to maintain or fix breaks on the pipeline during winter. These mountains are very high and receive considerable snowfall. The only way to get at a break during the winter would be to use tracked vehicles, and unless special winter restoration procedures were used, I can conceive of a situation where caterpillars would scrape the right-of-way free for miles to find and fix a break, stack up large mounds of snow, which during spring run-off would melt and undo all restoration and create severe erosion problems on the right-of-way.

(5) Soil instability in the Vermillion Creek and Canyon Creek areas (as discussed on p. 1-36 of the DEIS) contributed to the screening of this alternative from detailed analysis.

The soils on the Pine Mountain route are erosive and have a potential for sliding; however, Rock Springs District personnel have indicated that the slip plume is an obtuse angle of slippage, minimizing the likelihood of severe soil movement.

(6) The MAPCO proposal and the alternatives are consistent with the BLM Rock Springs District management framework plan.

(7) The route following Highway 430 was screened from detailed analysis for the reasons mentioned in the response to Comment 4 of this letter. In addition, to minimize surface disturbance in new areas two criteria were used for routing the proposed pipeline (DEIS, page 1-7). These were to follow existing pipelines or other existing ROWs. Approximately 85 percent of the East of Little Mountain alternative (proposed action) is near existing rights-of-way; the equivalent figure for the Pine Mountain alternative is 86 percent.

(8) The phrase "existing ROW" was not meant to be confused with the concept of planning corridors for utilities. The BLM Rock Springs District has not yet designated utility corridors in this area. The Mountain Fuels pipeline on top of Pine Mountain is still used for transporting natural gas to drilling operations located on top of Pine Mountain as well as removing products from these wells.

(9) This proposal is for one pipeline and does not provide for corridors, multiple pipelines or any other utility. Each subsequent proposal will be analyzed on a case-by-case basis on the anticipated environmental impacts and the merits of the proposal at that time. For this proposal, the alternatives were sited to avoid forested areas. In the case of the Pine Mountain alternative, 2 to 5 acres (depending on ROW width) of forest would be lost to construction.

(10) This comment is addressed in the following responses to comments 11-15.

(11) The ROW would be rehabilitated after construction as discussed in the DEIS, page 1-22. Rehabilitation efforts may have to be repeated.

Maintenance is defined as keeping the pipeline system in a state of repair and efficiency. The emphasis in pipeline maintenance is on the prevention of damage and deterioration. Improvements in materials, construction methods and operating procedures have eliminated or greatly reduced many of the common causes of pipe failure and deterioration. CFR 49 Part 195.400 requires maintaining current maps, operation records, repair records, line markers. Surface facilities must also be inspected at intervals not exceeding two weeks. Inspection of navigable waterway crossings is required every 5 years. The cathodic protection systems must be inspected every 12 months, but the rectifiers must be checked at intervals not exceeding 2 months. Each mainline valve and all pressure control equipment must be checked at intervals not exceeding 6 months.

The inspection of surface facilities would be conducted at 2 week intervals by aircraft. Valves, rectifiers and pressure control equipment would be maintained from existing roads. MAPCO would use vehicles on the ROW only to make repairs, a low frequency event. Access points on public lands where the potential exists for use by off-road vehicles have been identified, and site-specific measures would be developed to discourage access. In spite of these efforts it is recognized that off-road vehicles may gain access at some points along the route. Problem areas would have to be dealt with on a case-by-case basis by the land management agencies or private landowners.

(12) Although the frequency of pipeline ruptures is low, and the majority are caused by external forces (especially unlikely in winter), if a break occurred in the pipeline during the winter, equipment able to negotiate the terrain and conditions would be used to find and fix the break. If it is necessary to repair a leak in the pipeline in an area of deep snow cover access to the leak would be made by use of snow cats or helicopters. It would not be necessary to remove snow from miles of ROW. Surface disturbance would be confined to the immediate areas of the leak and possibly to two small areas (20 feet x 20 feet) 200-300 feet on either side of the leak. Depending upon the conditions, terrain, and site specific problems, a break in the pipeline may be repaired on a temporary basis and permanent repairs made during more favorable seasons. In either case, rehabilitation would be required.

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(13) 3. The practise of burying a pipeline under the river does not seem applicable to Wyoming winters. As the rivers freeze over, nature creates a containment atructure that would trap a slow hydrocarbon leak under the ice. A slow leak would poison the flora and fauna of the river as far up or down river as it is frozen. This aquatic life is in a delicate balance during the winter and is dependant on small ice breaks and fizzures for oxygenation. To replace the dissolved oxygen with hydrocarbons in the case of a slow leak would be a disaster.

(14) 4. Little attention was given in the EIS for cathodic protection facilities and their impacts.

(15) 5. No ground water quality impacts were identified. Again, I assert that you could indeed have a situation where the frost line could hold natural gasses and gasoline in contact with ground water long enough to pollute them. The solubilities of unrefined crude products such as phenols and other polar hydrocarbons could constitute a serious ground water pollutant.

(16) IV. The EIS did not support sufficiently the denial of alternative nos. 5 and 7 and the company's chosen route.

(17) 1. A claim is made on page xi that "slight differences in site specific requirements for mitigation or recovery potential were identified." I do not believe that if "slight differences" exist there is justification for carving a right-of-way through virgin territory over the top of a 9700 foot mountain.

(18) 2. The denial of alternative number 1, based on it not following an existing right-of-way and a reasonable option was available that did, is not consistent with the BLM preferred Pine Mountain alternative.

(19) 3. I have read the reasons for denial of alternative nos. 5 and 7 and the MAPCO route and still am not clear as to why these alternatives were denied. Vague statements are made on page 1-36, without reference to any individual alternative, concerning soils instability, but I am still unable to identify specific reasons as to why alternatives 5, 7 and East Little Mountain were not considered in detail.

(20) V. The EIS did not address the magnitude of environmental consequences of the preferred alternative.

(21) 1. From the outset it seems as if BLM lands, particularyly BLM forests, take second place. Page I-15 addresses Forest Service safeguards involving construction plans, fire plans, landscape plans, and maintenance plans, but does not say anything about

(13) The alternative to burying the pipeline at river crossings is to place the pipeline above the water. Placing the pipeline above water would increase the chance of a rupture as the line would be more susceptible to damage from vandalism, ice, and floods. Adverse visual impacts would also be greater.

At river crossings a more conservative pipeline design criteria is used. A greater pipe wall thickness is required and all welds are radiographically inspected, so that a leak would be extremely rare, as discussed on page 1-30 of the DEIS. If a leak occurred during ice cover the product (which is generally immiscible in water and lighter than water) would rise to the surface below the ice and move downriver with the current. Vapor would be released upon contact with area of ice free river, while the balance of liquids would remain at the water surface until they evaporate. Ruptures and spills have a low frequency of occurrence and the majority of those that do occur are very small. MAPCO's proposed precautions to minimize such an occurrence (special attention at river crossings) have been considered adequate, especially in light of their past record of no spills at river crossings. Further reference can be made to the MAPCO EIS background file available for review at the BLM-NMSO. Based on the analysis of effects of spills to the aquatic environment during winter, impacts would be confined to a small localized area.

(14) Cathodic protection systems are discussed in the DEIS on page 1-7 and 1-10. Cathodic protection is a means of corrosion control supplementary to the protective coatings applied to the pipe. Cathodic protection is required by CFR 49, Part 195.414. Without cathodic protection, background or stray electrical currents flowing in the soil could result in corrosion in sections of pipe. The cathodic protection system maintains a negative charge with respect to the soil.

(15) Historically, the major cause of ruptures is external forces such as bulldozers, graders and ditching machines, as discussed in the DEIS page 1-29.

If a rupture did occur, the hydrocarbons having more than four carbon atoms generally would be in a liquid state. This would comprise approximately 40 percent of the product by volume. A pipeline leak would tend to surface as the liquids are lighter and not miscible with water, so pollution of groundwater is unlikely. Due to the pressure behind the leak, a path of least resistance would be taken which is likely to be through a crack or fissure in the frozen ground. Phenols and polar hydrocarbons are not present in the liquids being transported.

(16) A decision as to the denial of any alternative is not made during the environmental analysis process. Decisions at this point are only made regarding the level of analysis required for the identified alternatives.

Reasons for eliminating alternative 5 (a route following Highway 430) are discussed in the response to letter 12 comment 4 and in the DEIS, pages 1-32 and 1-36.

The primary reasons for screening alternative 7, (Dutch John across Flaming Gorge Reservoir) are discussed in the DEIS, pages 1-36 and 1-37.

Additionally, the existing Northwest pipeline was constructed prior to the area being designated as a National Recreation Area (NRA). This designation means the management objectives of the area are primarily related to the preservation of recreation and scenic values. As evidenced by the existing pipeline in the NRA, the disturbances would be difficult to mitigate and reclaim, and still meet the management objectives.

(17) Environmental analysis indicated that there would be no significant differences in impacts between the alternatives. Therefore, the selection of the preferred alternative was based on the routes' overall potential for mitigation and recovery and agency and public preferences known at the time.

(18) Alternative 1, through Arches National Park, was not a reasonable alternative because of Congress' single-purpose designation of the Park. An existing ROW does cross the park; however, the pipeline was in place prior to a major expansion of the area designated as a Park. Screening of this alternative from detailed analysis is not analogous to the case of the Pine Mountain alternative.

(19) The East of Little Mountain Alternative (proposed action) was analyzed in detail as indicated in Map 1-6 on DEIS page 1-39 and throughout the statement. Discussion of the reasons for screening Alternatives 5 (a route following Highway 430) and 7 (Dutch John across Flaming Gorge Reservoir) from detailed analysis is found on DEIS pages 1-32 to 1-37. Further discussion of the bases for screening a route following Highway 430 from detailed analysis is presented in the response to letter 12, comment 4.

(20) Specific concerns with the "magnitude of environmental consequences of the preferred alternative" are addressed in the following responses (comments 21-23).

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(21) cont. BLM forests. This implies that BLM forests are inherently less valuable than Forest Service forests.

(22) I do not believe this to be the case. The BLM should play second fiddle to no one. I urge you to include all mitigation measures and reclamation plans--construction plans, fire plans, landscape and maintenance plans--in the statement. These plans would otherwise become part of reclamation and mitigation without being included in the statement. This is very critical. No one can assess or evaluate the environmental impact without the stipulation surrounding a plan that itself becomes part of the impact. The stipulations surrounding the Right of Way grant are crucial to the impact.

(23) The statement on 1-18 regarding excavation and grading is a prefect case in point. I should hope that the BLM would never allow the southern slope of Little Mountain to be graded to an angle that would completely change the character of the mountain. This statement on page 1-18 gives MAFCO the license to do this. I have received assurances that this would be prevented in the right-of-way grant, however, these stipulations must be included in the statement to guarantee this will not be done and to properly evaluate the impact.

(24-27) 2. Criteria listed on page 3-4 under visual resources defines "contrasts between existing situation and the situation created by the proposed action or alternative" to be of "long term significance" if they constitute "contrasts of five or more years".

Criteria on the same page under operation defines long term significance if it would "lessen the quality of the recreational experience for users over the long term".

The same section on page 3-20 under visual resources (Pine Mountain OEC) discusses the marked contrast between exposed soils and surrounding vegetation. I simply do not agree that the slot created through the forest would revegetate in the 3 to 5 years, indicating the most term significance as outlined in table 3-6 on page3-19. The impacts created on Pine Mountain thirty years ago by oil exploration are still with us and have not revegetated any noticeable amount in the interim.

The short term impact classification of Jesse Ewing Canyon-Pine Mountain is absurd. Discounting divine intervention or technological innovation, I am not familiar with, there is just no way anyone can accomplish this. My point is further strengthened by reviewing page 3-9 where it is stated "Contrasts to landforms frequently occur in rocky and/or steep sloping terrain and are difficult to mitigate. This condition results in significant adverse impact to visual resources."

(21) Requirements of the BLM and FS regarding the proposal are basically the same. Discussion of plans and other requirements of the two agencies on DEIS pages 1-15 and throughout the document were not intended to imply otherwise.

(22) The construction measures which have been presented and discussed in detail in Chapter One of the DEIS incorporate many standard mitigation and resultant stipulations which would be applied on a case-by-case basis as well as some site-specific mitigation for critical problem areas. All practices and commitments to preserve resources made in Chapter One would be required by stipulation in the ROW grant.

The proposed project has been reviewed at the district level (BLM and FS). Based on District level recommendations, and impact analysis, specific mitigation measures would be included as stipulations in a ROW grant.

(23) The statement on DEIS page 1-18 to which the comment refers does not mean that the applicant would be given license to construct or operate the proposed project without strict adherence to stipulations developed as part of the ROW grant. (See the response to letter 12, comment 22).

(24-27) The following is a combined response to comments 24 through 27.

Assessments of impacts to visual resources was done using the BLM's Visual Resource Management System. Determinations of the duration of a significant contrast was determined by expected revegetation which would minimize color and texture contrasts. On page 3-20 of the DEIS it is stated that the visual contrast on Pine Mountain would take from 3-5 years to be reduced and up to 30 years to be restored to near its original condition. Proper rehabilitation techniques would mitigate potential impacts.

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(28) I submit to you that Jease Ewing Canyon and Pine Mountain are both rocky and steep in direct contradiction to the classification on page 3-19. The BLM right-of-way grant will decide by opening a new utility corridor whether this area, particularly Pine Mountain, will become an area of intensive impact surrounded by a few trees or remain a healthy hunting and recreational area for Sweetwater County.

(29) 3. No address was made to the fact that this area contains one of only two major elk herds not associated with a major mountain range. Critical winter habitat was defined in table 1-11 and dates were set for construction avoidance. Sir, I am no wildlife biologist but am a native of over twenty years in this area and I submit to you if there is any time the elk and deer would not be on Pine Mountain, it is the period mentioned (Nov. or Dec. 15 - April 1). There is simply too much snow. Any hunter I know would verify this.

(30) A logical and common sense approach would say that it is exactly the opposite. If there is a period to be avoided because of crucial wildlife use, it is the period June 1 - Nov. 30. This would allow construction to take place only in the dead of winter.

Sir, I do not wish to appear argumentive. I feel I must express my criticism of this EIS and bring to your attention several questions I have that I feel deserve answers.

I do not question the fact that our nation needs the pipeline. I hope that my comments and questions can bring about a solution to routing this pipeline using maximum common sense and minimum impact.

(31) I would appreciate answers to the following questions by number.

1. Why did the BLM and not MAPCO write the EIS?
2. What taxpayer dollars supported MAPCO in this statement, and if none, what fees were assessed against MAPCO?
3. What is the review process and dates from this point forward?
4. Does the BLM write, review, evaluate and approve its own statement?
5. Would you please supply dates and sources of publication of notices of the first scoping meeting and first hearing?
6. I received my EIS May 7. Isn't there a 30 day review period before the first hearing?
7. Are written comments as valid as oral comments expressed during the hearing?

(28) The route through Jesse Ewing Canyon has been revised to further mitigate any potential adverse effect by using the existing road bed (see Map A-3). The discussion on DEIS page 3-19 was limited to the proposed action. Visual impacts associated with the Pine Mountain alternative are discussed on page 3-20 of the DEIS.

The contention that a ROW grant would open a corridor assumes that any future construction would be adjacent to the MAPCO line if it is constructed. Approval of this ROW would not establish a corridor for future utilities nor would it preclude future environmental analysis of any proposed utility along the same route.

(29) (30) The following is a combined response to comments 29 and 30.

The information concerning the crucial elk and deer use on and near Pine Mountain was obtained from the Salt Wells Unit Resource Analysis (URA) data and supplied by the BLM Rock Springs District Office in a letter dated July 12, 1979. This information was confirmed by a Wyoming Game and Fish Department representative at the June 3rd public meeting held in Rock Springs, WY.

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(31) cont.

8. Testimony is to be included in the FEIS. Are written comments included?

9. I am very upset that archaeological surveys are taking place on the BLM preferred alternative route. Isn't this hearing process a process in which the public has input into the route and impact mitigation?

10. Has the final route decision already been made?

11. Why was the local BLM technical staff contacted after the EIS was written to comment?

12. Will their comments become part of the FEIS?

13. If not, why not?

14. Can we obtain copies of the comments by Soil Scientist, Wildlife Biologist, Hydrologist, Fisheries Biologist, Archaeologist, and Forester?

15. Six special meetings were held. As there is little evidence of the considerable thought behind the chosen route in the EIS, could we get minutes of those meetings?

16. How can we get access to more exact maps of the area to be impacted?

17. Why on page 4-5 has MAPCO not accepted the Pine Mountain alternative?

Again, I would like to state my intention of hopefully generating a solution acceptable to all concerned. I am not a technical specialist in any field within the BLM structure, however, I do feel qualified to comment on an area in which I am a native and which I love dearly. I beseech you to treat this area as if it were your own, for it is.

I would like to cordially invite you and your NREI team to tour with me this area whose future is dependant on your action.

Thank you.

Sincerely,

Craig Thompson

(31)

United States Department of the Interior

IN REPLY REFER TO
3162 (922)

BUREAU OF LAND MANAGEMENT
NEW MEXICO STATE OFFICE
P.O. BOX 1449
SANTA FE, NEW MEXICO 87501

JUN 23 1980

Mr. Craig F. Thompson
1241 Palisades
Rock Springs, WY 82901

Dear Mr. Thompson:

In response to the questions about the MAPCO DEIS which you raised in your letter of May 18, 1980, the following information is provided. Comments which you provided in the initial 5½ pages of the letter will be addressed in the FEIS. This letter focuses on the specific questions you asked us to respond to, numbered 1 through 17. The questions were largely procedural.

1. Why did the BLM and not MAPCO write the EIS?

BLM is writing the EIS because it is our responsibility under the National Environmental Policy Act (NEPA), and the federal responsibility cannot be delegated to an applicant.

2. What taxpayer dollars supported MAPCO in this statement, and if none, what fees were assessed against MAPCO?

The initiative for this proposal came from outside the BLM structure and the applicant must reimburse the Government for all expenses. Additionally, if the right-of-way is granted, MAPCO will be assessed fair market value for use of the right-of-way.

3. What is the review process and dates from this point forward?

The public comment period on the DEIS ended on June 16, 1980. After receiving, analyzing, and responding to comments received, a final EIS (FEIS) will be prepared incorporating appropriate changes. It is planned that a FEIS will be filed with the Environmental Protection Agency (EPA) and released to the public in July, 1980. Following the filing, a 30 day waiting period is mandated before a final decision can be made concerning the application.

4. Does the BLM write, review, evaluate, and approve its own statement

The BLM has the authority and responsibility to prepare the statement.

The Non-Bureau Energy Initiatives Team (NBEI) of the New Mexico State Office had primary responsibility for the preparation of the DEIS. They were assisted by a Coordinator assigned to the project from each affected BLM State Office. In addition, numerous specialists in each of the BLM State and District Offices were involved in the process.

The initial task of the RBEI team was the development of a Preparation Plan which was concurred in by each State, the Washington Office, and the Secretary of the Interior's Office of Environmental Project Review (OEPR).

Following approval of the Preparation Plan, a Preliminary Draft Environmental Impact Statement (PDEIS) was developed. This was reviewed and revised in accordance with comments received from each BLM State Office (and the Districts, through their State Offices), and the Forest Service as a cooperating agency. The actual writing of the document was done by a private contractor under the guidance and direction of BLM.

Review of the PDEIS was also solicited from numerous other Federal agencies, including the EPA, National Park Service, and the Bureau of Indian Affairs.

The circulation of the DEIS for public and agency comment is the major review and evaluation mechanism of the process. Comments and suggestions on the DEIS provide the basis of the Final Environmental Impact Statement (FEIS).

Before the FEIS is released it will be reviewed by the RBEI team and the other State Offices and the Forest Service.

5. Would you please supply dates and sources of publication of notices of the first scoping meeting and first hearing?

Notice of Intent to prepare an EIS was published in the Federal Register, Vol. 44, No. 134, on Wednesday, July 11, 1979. This also mentions the intent to hold scoping meetings.

Scoping meeting announcements were mailed out the first of August. The announcement identified time, date and location of all scoping meetings planned. The announcement was sent to 576 different government agencies and private individuals and organizations, as well as 519 different media, including 146 and 87 respectively, in Wyoming.

In addition to the announcement on August 4, 1979, the Rock Springs Rocket-Miner published an article about the upcoming August 28, 1979, Rock Springs scoping meeting. The Green River Star also gave coverage to the meeting on August 2., 1979. The Rocket-Miner had a follow-up article on August 29, 1979.

The MAPCO DEIS was filed with EPA on April 21, 1980, and notice of filing with EPA appeared in the Federal Register, Vol. 45, No. 87, Friday, May 2, 1980. Notice of MAPCO DEIS availability was published in the Federal Register, Vol. 45, No. 82, Friday, April 25, 1980. This notice included identification of places where review copies were available and cities where public hearings were held (stating that time, date and location would be publicized locally).

On April 23, 1980, the BLM (New Mexico State Office) issued a news release. This news release contained the same information published in the Federal Register Notice of Availability, as well as specifying the time, date, and location of public hearings. This news release was sent to the Wyoming State Office for distribution to local media. The news release was also sent to the Colorado and Utah State Offices for release at the same time.

On April 25, 1980, the BLM (Washington Office) issued a news release. This news release included the same information publicized in the Federal Register Notice of Availability.

Approximately 1,000 copies of the MAFCO DEIS were distributed by mail to various individuals, organizations, and government agencies. In addition, there were copies available at 40 different public libraries and the BLM and Forest Service Offices along the route, including the libraries at Rock Springs, Green River, Rawlins, and Kemmerer, Wyoming.

The public hearing article was published on May 6, 1980, in the Rocket-Miner. Although the article did not provide the time, date, and location of the public hearings it did announce DEIS availability and that specific information was available at each BLM and Forest Service Office along the route. Each copy of the DEIS available for public review contained a listing of the time, date, and location of the public hearings. The public hearing article was also published in the May 16, 1980, issue of High Country News. This article identified the time, date and location of the public hearings.

On May 22, 1980, the public hearing was held at 7:00 p.m. at the Outlaw Inn in Rock Springs, Wyoming. It came to our attention at this hearing that some interested parties had not received a copy of the DEIS. Actions were immediately taken to rectify this problem. A limited number of copies of the MAFCO DEIS was exhausted at the hearing; however, requests for copies were honored the following day either by mail or hand-delivery. All subsequent requests for a copy have also been honored, and copies have been available at the Rock Springs District Office since the May 28, 1980 hearing.

As a result of concerns raised at the public hearing, the Rock Springs BLM District also held, on June 3, 1980, at 7:00 p.m., an additional information/workshop meeting, open to the public, to discuss the proposed MAFCO route and alternatives. This meeting was announced in the Rocket-Miner on June 3, 1980, and had approximately 50 people in attendance. A follow-up article was published in the Rocket-Miner on June 5, 1980.

6. I received my EIS May 7. Isn't there a 30 day review period before the first hearing?

Section 1506.6(c)(2) of the Council on Environmental Quality Regulations states that "If a Draft Environmental Impact Statement is to be considered at a public hearing, the agency should make the statement available to the public at least 15 days in advance." The statement was made available to the public on April 21, 1980, public hearings began on May 19, 1980, in Santa Fe, New Mexico.

7. Are written comments as valid as oral comments expressed during the hearing?

Yes, written comments received during the comment period are published in the FEIS and comments individually responded to, with changes in the text as appropriate.

8. Testimony is to be included in the FEIS. Are written comments included?

Written comments received during the comment period will be included, in their entirety, in the FEIS.

9. I am very upset that archaeological surveys are taking place on the ELM preferred alternative route. Isn't this hearing process a process in which the public has input into the route and impact mitigation?

Yes, the hearing process is designed to solicit public input.

The process required for Cultural Resource compliance for the National Historic Preservation Act is time consuming. MAPCO is aware of the requirements for on the ground survey, and avoidance, if prudent and feasible, of cultural sites. MAPCO is undertaking the surveys at some risk that BLM will select a different route or disapprove the proposal, however, the economics of construction delays versus the cost of cultural surveys makes the risk worthwhile, in their estimation.

10. Has the final route decision already been made?

No, the decision to grant a right-of-way and if so, routing decisions will be made after completion and consideration of the FEIS and any other relevant information.

11. Why was the local BLM technical staff contacted after the EIS was written to comment?

The Rock Springs District, through the Wyoming State Office has been involved in the development of the EIS since its inception.

The Wyoming State Coordinator has been responsible to insure coordination within Wyoming. In earlier efforts to resolve difficulties in the three state area, the Rock Springs District has been involved in numerous meetings and telephone conversations.

12. Will their comments become part of the FEIS?

The Rock Springs District, as with all the other BLM Districts affected by any of the alternatives, were participants in the development of the DEIS. Various specialists provided information, comments, etc., throughout the process. This material was consolidated and coordinated by each State Office coordinator and supplied to the NEEI team.

No comments from BLM Offices will be reproduced separately and responded to in the FEIS as is done with public comments. Internal comment from BLM and Forest Service Offices are considered and appropriate revisions are made in the EIS.

13. If not, why not?

See response to questions number 4 and 12 above.

14. Can we obtain copies of the comments by Soil Scientist, Wildlife Biologist, Hydrologist, Fisheries Biologist, Archaeologist, and Forester?

As mentioned earlier, we have utilized information and comments, from numerous Soil Scientists, Wildlife Biologists, etc. Much of this material was in the form of notes, oral input, and a consolidation of several viewpoints. Specific comments from particular BLM specialists would have to be requested from them.

15. Six special meetings were held. As there is little evidence of the considerable thought behind the chosen route in the EIS, could we get the minutes of the meetings?

Brief summaries of the meetings are enclosed.

16. How can we get access to more exact maps of the area to be impacted?

Better maps of the route are available to use at the Cheyenne BLM State Office. The maps (plats) are center line surveys of the existing staked line only and are a part of MAFCO's official application file.

Maps at a scale of 4" = 1 mile for areas of special concern i.e., Pine Mountain will be included in the FEIS.

17. Why on page 4-5 has MAFCO not accepted the Pine Mountain alternative?

MAFCO prefers their proposed action because it is shorter and, therefore, less costly. The Pine Mountain route was developed as the preferred route in response to environmental concerns of BLM staff and specialists.

In light of the public comments on the DEIS relating to the Pine Mountain alternative, the BLM is reevaluating both this and the Proposed Action alternative.

Your interest and concern about the proposal is appreciated.

Sincerely yours,

Larry L. Woodard

Associate State Director

Enclosures

13

INTERNATIONAL SOCIETY FOR THE PROTECTION OF MUSTANGS & BURROS

11790 Dipodar Way • Reno, Nevada 89506
Telephone: (702) 972-1989

June 2, 1980
1306 Kimberly
Rock Springs, Wyoming

State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

Will you please make this statement part of the hearing record on Mapco/s Rocky Mountain Liquid Hydrocarbons Pipeline.

(1) We are opposed to the pipeline going under the Green River. It should cross over the River. The pipeline should follow existing corridors and the Hiwy to Rock Springs and then go South along Hiway 430 to the Colorado line.

(2) The proposed action East of Little Mountain and the Pine Mountain Alternate are both very poor choices for a pipeline due to heavy snow and limited access to the area in winter months. They are both too close to the Flaming Gorge Recreation Area. The area is also a very good range for wild horses and contains many fine herds. Any further human activity in this area would be detrimental to wild horse herds and wildlife in the area.

(3) You mentaon the use of vehicle barriers to keep vehicles out of an area. We have seen these used many times and they have yet to keep vehicles out of an area once it is opened up. You also do not have the personnel to patrol these areas.

In conclusion and for the above mentioned reasons we favor the pipeline route to go South of Rock Springs along Hiway 430 to the Colorado Line.

Sincerely,

John C. Borzea

John C. Borzea, Executive Vice Pres.

(1) Refer to the response to letter 12, comment 4.

(2) Discussion of winter access is in the response to letter 12, comments 11-15. The management plan for the Flaming Gorge NRA does not preclude projects of this kind. The impacts to wild horses and their range were assessed during the preparation of the DEIS. The information used to evaluate the potential of impacts on wild horses was provided by the BLM Rock Springs District. Personnel in that office concurred with assessment findings which did not indicate any significant impacts to wild horses and their range. The analysis is available in the BLM MMSO background file.

(3) Vehicle barriers would not entirely mitigate the potential of impacts caused by increased access, and in some areas District personnel may recommend other measures to reduce the potential impacts which may be more effective.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL/AREA OFFICE
EXECUTIVE TOWER 1405 CURTIS STREET
DENVER, COLORADO 80203

REGION VIII

June 3, 1980

IN REPLY REFER TO
8SOQ

Mr. Arthur W. Zimmerman
State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Zimmerman:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (EIS) for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline. This proposed pipeline originates in Gaine County, Texas through New Mexico, Colorado and Utah to the Rock Springs, Wyoming area, a distance of approximately 1,172 miles.

Your draft EIS has been reviewed with specific consideration for the areas of responsibility assigned the Department of Housing and Urban Development (HUD). The review was coordinated on June 2, 1980 between HUD's Regional Offices in Denver and Fort Worth. The review considered the proposal's compatibility with local and regional comprehensive planning and impacts on urbanized areas. Within these areas the document is adequate.

If you have any questions regarding these comments, please contact Mr. Carroll F. Goodwin, Area Environmental Clearance Officer, at FTS 327-3102. To insure future coordination, please send a copy of the Final EIS not only to us but to Mr. Otis Trimble, Regional Environmental Clearance Officer, Fort Worth Region VI Office, P. O. Box 2905, Fort Worth, Texas 76113.

Sincerely,

Raymond D. McKinney

Raymond D. McKinney
Director
Program Planning and Evaluation

AREA OFFICE
Denver, Colorado

Department of Local Affairs
Colorado Division of Planning

Philip H. Schnuck, Director

Richard D. Lamm, Governor

June 3, 1980

Mr. Arthur W. Zimmerman
State Director
Bureau of Land Management
New Mexico State Office
P. O. Box 1449
Santa Fe, New Mexico 87501

SUBJECT: MAPCO Liquid Hydrocarbon Pipeline
Draft Environmental Impact Statement

Dear Mr. Zimmerman:

The Colorado Clearinghouse has received the above-referenced draft Environmental Impact Statement and has distributed it to interested state agencies. Comments received from Division of Disaster Emergency Services, Colorado Historical Society, Division of Planning, Office of Energy Conservation, Department of Highways and the Division of Water Resources are enclosed for your information.

Thank you for the opportunity to review this matter.

Sincerely,

Stephen O. Ellis
Chief Planner

SE/PN/vt
Enclosures

cc: Office of the Governor
Department of Natural Resources
Department of Highways
Office of Energy Conservation
Colorado Historical Society
Department of Military Affairs
Department of Local Affairs

520 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80203 (303) 892-2251

MEMORANDUM

Department of Military Affairs
DIVISION OF DISASTER EMERGENCY SERVICES

Richard D. Lamm
Governor

Brig. Gen. John I. Hunter
The Adjutant General

John F. Byrne
Director

TO: Stephen O. Ellis, Colorado Clearing House

FROM: Colorado Division of Disaster Emergency Services, Jack Gruby

SUBJECT: MAPCO Liquid Hydrocarbon Pipeline

DATE: Notification of Application
Radio equipment for Volunteer Fire Department

Notification of Application
Fire Station Sites

DATE: 27 May 1980

The Colorado Division of Disaster Emergency Services concurs in the environmental statement subject Mapco liquid hydrocarbon pipeline, Action #79139, and in the two (2) notifications of applications listed in the subject stated above.

JOT:bjl

MAY 28 1980
DIV. OF PLANNING

15b

COLORADO
HISTORICAL
SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

April 6, 1980

Mr. Stephen O. Ellis
Principal Planner
A-95 Clearinghouse
520 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203

MAY 09 1980
DIV. OF PLANNING

Dear Mr. Ellis,

This is to acknowledge receipt of the environmental impact statement for the MAPCO Liquid Hydrocarbon Pipeline, #79-139.

DATE RECEIVED May 2, 1980 DATE DUE May 30, 1980

The federal agency has outlined certain provisions in this document for cultural resources management to comply with Executive Order 11593 and the National Historic Preservation Act as amended.

Once these conditions have been adhered to, in consultation with this office, in accordance with 36 CFR 800, compliance will be achieved.

Thank you for the opportunity to comment on the proposed project.

If this office can be of further assistance, please do not hesitate to call upon the Compliance Section at 839-3391.

Sincerely,

Arthur C. Townsend
State Historic Preservation Officer

Compliance
Form No. 518

15c

Department of Local Affairs
Colorado Division of Planning

Philip H. Schmuck, Director

Richard D. Lamm, Governor

MEMORANDUM

DATE : May 28, 1980

TO : Steve Ellis
Colorado Clearinghouse

MAY 29 1980
DIV. OF PLANNING

FROM : Philip H. Schmuck

SUBJECT : MAPCO Liquid Hydrocarbon Pipeline
DEIS # 79-139

MAPCO proposes to construct a pipeline from Wyoming to Texas in order to transport mixed stream hydrocarbons to a common distribution center. Part of the pipeline will be located along the western edge of Colorado, affecting the areas around Rangely, Grand Junction, Durango and Cortez. The Division of Planning has reviewed those sections of the EIS which address expected social, economic and land use impacts.

(1) Our conclusion is that the project's socio-economic impacts will be minor, and that land use plans, where they exist, will be adhered to. We would suggest, however, that the proponent work closely with the community of Rangely since the housing availability situation in that community may change rapidly in view of several other construction projects proposed for the area. Otherwise, the Division has not identified any additional concerns to be addressed in the final EIS.

PHS/amm

520 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80203 (303) 892-2251

(1) This suggestion will be forwarded to MAPCO.

STATE OF COLORADO

OFFICE OF ENERGY CONSERVATION
Office of the Governor
1600 Downing Street, 2nd Floor
Denver, Colorado 80218
Phone (303) 839-2507, 839-2186

Richard D. Lamm, Governor
M. Buie Seawell, Executive Director

MEMORANDUM

MAY 29 1980
DIV. OF PLANNING

DATE: May 27, 1980

TO: Colorado Clearinghouse

FROM: Office of Energy Conservation

SUBJECT: MAPCO Liquid Hydrocarbon Pipeline. BLM. #79-139

The Office of Energy Conservation has reviewed the MAPCO Liquid Hydrocarbon Pipeline Draft EIS and offers the following comments.

The Draft EIS contains a fairly comprehensive energy use analysis for both the construction and operation phases of the project. The energy balance estimate calculates that 1.53% - 1.79% of the potential Btu's transported by the pipeline would be required to construct and operate the proposed action during its 30 year life. This appears to be a relatively energy efficient method of transporting various liquid hydrocarbons.

(1) OEC is concerned, however, that the need for construction of the proposed pipeline is based on anticipated short-term production increases of liquid hydrocarbons in the Rocky Mountain Overthrust Area. Will this additional infrastructure supporting non-renewable resource utilization mean a delay in the development of renewable energy sources?

DF:KS:pl

(1) The past history of capital investment by the fossil fuel industry makes it extremely unlikely that any of the financial capital available for this project would be diverted to development of renewable energy sources if this project were not approved.

COLORADO STATE DEPARTMENT OF HIGHWAYS 15e

May 28, 1980

Mr. Philip H. Schmuck
Director
Colorado Division of Planning
520 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203

Dear Mr. Schmuck:

The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement for the MAPCO Liquid Hydrocarbons Pipeline and has the following comments:

(1) The maps in the document show that several highways will be affected by this project, including US 160, US 550, US 666, SH 145 and SH 139. It appears that the pipeline will be within the right of way of US 160 and SH 139 for several miles. This work will require close coordination with this Department. Utility permits will also be required.

Thank you for the opportunity to review this document.

Very truly yours,

Harvey R. Atchison
Director
Division of Transportation Planning

By Barbara L.S. Chocol
Barbara L.S. Chocol
Manager
Impact Evaluation Branch

BG

MAY 30 1980
DIV. OF PLANNING

4201 EAST ARKANSAS AVENUE DENVER, CO 80222 (303) 757-9011

(1) This suggestion will be forwarded to MAPCO.

RICHARD D. LAMM
Governor

J. A. DAVIDSON
State Engineer

DIVISION OF WATER RESOURCES

Department of Natural Resources
1313 Sherman Street - Room 818
Denver, Colorado 80203
Administration (303) 839-3581
Ground Water (303) 839-3587

JUN 03 1980
DIV. OF PLANNING

May 30, 1980

MEMORANDUM

TO: STEPHEN O. ELLIS, STATE CLEARINGHOUSE

FROM: HAL D. SIMPSON, CHIEF, WATER MANAGEMENT BRANCH

SUBJECT: MAPCO LIQUID HYDROCARBON PIPELINE, DRAFT ENVIRONMENTAL IMPACT STATEMENT

We have reviewed the subject document for water resources interests. Our concern is to minimize the impact of construction on streams and man-made hydraulic structures. Other than this general concern, we have no comments or preference of alternatives.

Hal D. Simpson

Hal D. Simpson

HDS/WWB:mvf

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

June 5, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, NM 87501

Reference: MAPCO Environmental Impact Statement
Rocky Mountain Liquids Hydrocarbon Pipeline

Gentlemen:

Cities Service Company, as a major producer, purchaser and supplier of natural gas liquids is vitally interested in the proposed MAPCO Rocky Mountain Liquid Hydrocarbons Pipeline (hereinafter referred to as "MAPCO Pipeline"). Accordingly, we are pleased to have this opportunity to make the following comments concerning the Draft Environmental Impact Statement on said MAPCO Pipeline.

The MAPCO Pipeline would be of great benefit in assisting our nation's attempt to meet the energy needs of our country from domestic sources as the Pipeline would move considerable quantities of liquid hydrocarbons from the Rocky Mountain area to major consuming markets. At the same time, the Draft Environmental Impact Statement makes clear the fact that local markets would continue to be served.

The following is a summary of what we believe are the most important points stated in the Draft Environmental Impact Statement and which can result in no other conclusion but that the MAPCO Pipeline is a most worthwhile and viable project deserving the complete support of the Department of the Interior.

(1) The projected increase in the total production of light liquid hydrocarbons in the Rocky Mountain Overthrust Area from 18,000 BPD in 1979 to 110,000 BPD by 1990 clearly indicates that supply demand in local markets can be easily satisfied while allowing this much needed energy source to be carried by pipeline to other major consuming markets. (Page 1-7)

(2) The MAPCO Pipeline would be buried, would be near existing pipelines or other existing rights-of-way, and would not cross any lands under the jurisdiction of the National Park Service or existing or proposed Rare II or Wilderness Study Areas. (Page 1-7)

(3) The construction of the MAPCO Pipeline would not disturb any more land than is absolutely necessary and completed construction areas, including right-of-way and roads, would be returned as nearly as practical to their original condition. Extensive reseeding and erosion control operations would be undertaken as well. (Pages 1-21 and 1-22)

(4) Care would be taken so that the pipeline project would not adversely affect the tourist and recreational use of the area of construction during the summer months. Similarly, the scenic values of such area have been pledged to be protected by MAPCO. (Pages 1-24 and 1-26)

(5) By meeting the certain criteria described in Chapter Three of the Draft Environmental Impact Statement, it is clear that there would be "insignificant" impacts to climate, air quality, geologic hazards, soils, vegetation, wild life, land uses, transportation networks and social and economic conditions. (Pages 3-1 et seq.)

It is apparent from the above summary that any short-term use of the environment in the construction of the MAPCO Pipeline is more than offset by the long-term productivity to the nation resulting from the proposed project. Cities Service Company urges prompt governmental review and approval of the proposed MAPCO Pipeline.

Respectfully submitted,

CITIES SERVICE COMPANY

By J. Michael Geer
J. Michael Geer

JMG/ncs
E4/D/L1-3

cc: Mr. Eugene G. Bell
Mapco, Inc.

Defenders OF WILDLIFE

June 4, 1980

Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodard

Defenders Of Wildlife requests that the written comment deadline of June 16, 1980, for evaluation of the DEIS on the proposed MAPCO Rocky Mountain Liquid Hydrocarbons Pipeline be extended for at least 60 days, for the following reasons:

1) In my position as North Central Representative for Defenders Of Wildlife, a major national wildlife conservation organization, I am most always notified by appropriate agencies of impending impacts on wildlife and wildlife habitat in the Rocky Mountain area, and especially when those impacts are going to occur in my back yard.

I was provided with a copy of this DEIS about three-hours before the public hearing convened in Rock Springs, Wyoming, May 22.

2) I am on the Board of Directors of Izaak Walton League, Vice President of Sweetwater Wildlife Association, Secretary of Saedakadee Audubon Society, organizations whose members are very concerned about the future of Wyoming's wild-places and wildlife. None of these organizations received a copy of this DEIS nor were they notified that one copy of this document was available for review at the Rock Springs BLM office.

3) Copies of this document were not made available to state and local organizations such as Wyoming Outdoor Council, International Association for the Protection of Mustangs and Burros, Green River City Council, President of the Wyoming Game and Fish Commission, and many other groups and agencies. Neither were these people notified this DEIS could be reviewed at the BLM office.

4) Because of the unavailibility of this DEIS, people attending the public hearing at Rock Springs learned of BLM's proposal to route this pipeline over Pine Mountain, through Sweetwater County's tiny bit of forest, through a critical elk wintering area, only by word of mouth. Further, your representative from New Mexico did not outline areas of concern, discuss alternative routes, or point out impacts. And yet we were supposed to evaluate this DEIS (which most of us had never seen) for the record. It's amazing the way a bureaucracy can load a horse backward, into the wagon, and tell it to get-up.

5) Either through gross negligence or deliberate neglect, copies of this DEIS were not made available to the very spectrum of people who are most interested and who would have evaluated and commented on this proposal.

1244 NINETEENTH STREET, NW * WASHINGTON, DC 20036 * (202) 659-9510

60

IN REPLY REFER TO:
1792 (922)

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
NEW MEXICO STATE OFFICE
P.O. BOX 1449
SANTA FE, NEW MEXICO 87501

JUN 17 1980

Mr. Dick Randall
North Central Representative
Defenders of Wildlife
P.O. Box 507
Rock Springs, WY 82901

Dear Mr. Randall:

In response to your June 4, 1980, request for an extension of the comment period on the MAPCO Rocky Mountain Liquid Hydrocarbons Pipeline DEIS, I have reviewed the steps taken to obtain public input. On the basis of this review, I am denying your request for an extension of the comment period. The following explains my rationale.

1. Notice of Intent to prepare an EIS was published in the Federal Register, Vol. 44, No. 134, on Wednesday, July 11, 1979. This also mentions the intent to hold scoping meetings.

2. Scoping meeting announcements were mailed out the first of August. The announcement identified time, date and location of all scoping meetings planned. The Announcement was sent to 574 different government agencies and private individuals and organizations, as well as 519 different media, including 164 and 81 respectively, in Wyoming. The mailing list used for disseminating this announcement included the individuals and organizations mentioned in your June 4, 1980, letter. None of these individuals or organizations attended or participated in any of the scoping meetings.

3. In addition to the announcement on August 4, 1979, the Rock Springs Rocket-Miner published an article about the upcoming August 28, 1979, Rock Springs scoping meeting. The Green River Star also gave coverage to the meeting on August 27, 1979. The Rocket-Miner had a follow-up article on August 29, 1979.

4. The MAPCO DEIS was filed with EPA on April 21, 1980, and notice of filing with EPA appeared in the Federal Register, Vol. 45, No. 87, Friday, May 2, 1980. Notice of MAPCO DEIS availability was published in the Federal Register, Vol. 45, No. 82, Friday, April 25, 1980. This notice included identification of places where review copies were available and cities where public hearings were held stating that time, date and location would be publicized locally.

5. On April 23, 1980, the BLM (New Mexico State Office) issued a news release. This news release contained the same information published in the Federal Register Notice of Availability, as well as specifying the time, date, and location of public hearings. This news release was sent to the Wyoming State Office for distribution to local media. The news release was also sent to the Colorado and Utah State Offices for release at the same time.

6. On April 25, 1980, the BLM (Washington Office) issued a news release. This news release included the same information publicized in the Federal Register Notice of Availability.

7. Approximately 1,000 copies of the MAPCO DEIS were distributed by mail to various individuals, organizations, and government agencies. In addition, there were copies available at 40 different public libraries and the BLM and Forest Service offices along the route, including the libraries at Rock Springs, Green River, Rawlins, and Kemmerer, Wyoming.

Larry Woodard
Page 2

6) For all of the above reasons; under the intent of the National Environmental Policy Act, I doubt that the May 22, hearing at Rock Springs can be construed as a legal public hearing.

After considerable bloodhounding I have tracked the list of Wyoming people who were supposed to receive a copy of this DEIS to the Cheyenne BLM office. From there, a computerized list was mailed to your New Mexico office - twice! Someone in your own office in the bottleneck. The DEIS was never mailed to people on the Wyoming list.

Last evening Rock Springs BLM conducted a public meeting to apprise some very disgruntled people of alternative routes. Dean Foragren, area resource manager, offered to phone your office and have copies of the DEIS mailed to agencies and organizations I could identify. Most of the people who would be evaluating this document are volunteers. Only a few are paid professionals. By the time the documents arrived these people would have less than a week to evaluate, comment, on a complicated impact that will thrust right through the heart of some of the finest wildlife habitat in the West. Surely, Wyoming people whose quality of life will be affected by this pipeline should be allowed time to assess and comment.

I hope you will agree, the comment period should be extended and copies of the DEIS should be made available to interested parties.

Very truly yours,

Dick Randall
North Central Representative
Defenders Of Wildlife
Box 507
Rock Springs, Wyoming 82901

DR:dr

copies to:

BLM, Rock Springs
BLM, Cheyenne
Frank Gregg, Director, BLM
Toby Cooper.

8. The public hearing article was published on May 6, 1980, in the Rocket-Miner. Although the article did not provide the time, date, and location of the public hearings, it did announce DEIS availability and that specific information was available at each BLM and Forest Service office along the route. Each copy of the DEIS available for public review contained a listing of the time, date, and location of the public hearings. The public hearing article was also published in the May 16, 1980, issue of High Country News. This article identified the time, date and location of the public hearings.

9. On May 22, 1980, the public hearing was held at 7:00 p.m. at the Outlaw Inn in Rock Springs, Wyoming. It came to our attention at this hearing that some interested parties had not received a copy of the DEIS. Actions were immediately taken to rectify this problem. A limited number of copies of the NAFCO DEIS was exhausted at the hearing; however, requests for copies were honored the following day either by mail or hand-delivery. All subsequent requests for a copy have also been honored, and copies have been available at the Rock Springs District Office since the May 28, 1980, hearing.

10. As a result of concerns raised at the public hearing, the Rock Springs BLM District also held, on June 3, 1980, at 7:00 p.m., an additional information/workshop meeting, open to the public, to discuss the proposed NAFCO route and alternatives. This meeting was announced in the Rocket-Miner on June 3, 1980, and had approximately 50 people in attendance. A follow-up article was published in the Rocket-Miner on June 5, 1980.

In light of the above, I feel adequate notice of DEIS availability was provided and there has been ample means for interested persons to obtain a copy of the NAFCO DEIS. Although all persons may not be able to submit their comments by June 16, 1980, for inclusion in the Final EIS, their comments will not go unnoticed. There is a required waiting period of thirty (30) days from the filing of the Final EIS before a decision can be made. Any information received during that time will be considered in the decision-making process.

Since you are concerned about the Pine Mountain area specifically, you may be interested in our evaluation of comments relating to that alternative. We have received numerous written and oral comments objecting to the Pine Mountain alternative. As pointed out in the DEIS, we found no significant environmental differences between Pine Mountain Alternative and the Proposed Action (East of Little Mountain). Our selection of Pine Mountain was based on slight site specific differences and agency and public preferences known at that time.

Our analysis of public comments and further discussion with BLM personnel and the applicant indicates that, except for the wilderness inventory situation in the vicinity of the Red Creek Badlands, the Proposed Action represents the better of the two routes. We are continuing to analyze this problem and will not make a final decision until the question of the wilderness inventory is resolved. Therefore, the Final EIS will show the Agency's Preferred Alternative as the "Draft of the Project" Alternative for the portion of the route from mile post 800 to mile post 861.

The BLM will continue to evaluate both Pine Mountain and the Proposed Action Alternatives, with a final decision to be made based on the outcome of the wilderness inventory question and all other information received at that time.

Your interest concerning this project is appreciated.

Sincerely yours,

Larry L. Woodard
Associate State Director

DEPARTMENT OF THE ARMY
SACRAMENTO DISTRICT, CORPS OF ENGINEERS
650 CAPITOL MALL
SACRAMENTO, CALIFORNIA 95814

REPLY TO ATTENTION OF SPKCO-O

30 May 1980

State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

We have reviewed Mapco's "Rocky Mountain Liquid Hydrocarbons Pipeline" Environmental Impact Statement and offer the following comments:

a. The proposed project will not conflict with flood control projects or investigations within our jurisdiction.

(1) b. Pipeline crossings on the Green and Colorado Rivers will require a Section 10 Permit as indicated on Page I-2 of the draft EIS. The EIS also states that other river crossings meet the conditions of a Nationwide Section 404 Permit. This statement may be correct; however, the crossing of adjacent wetlands, like the Moab Marsh, may require an individual permit under Section 404 of the Clean Water Act, depending on the method used in crossing the wetland.

c. A Department of the Army permit cannot be issued for the project until the final EIS has been on file with EPA for 30 days.

It is suggested that you contact Mr. Rodney Woods of our Grand Junction office at telephone (FTS) 322-0333 concerning the need for a Section 404 permit for pipeline crossings through adjacent wetlands.

Sincerely,

PAUL P. KANAMASU
Colonel, CE
District Engineer

(1) MAPCO has initiated the permitting process with the Corps of Engineers.

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
SOUTH CENTRAL REGION
5000 MARBLE AVENUE, N.E., ROOM 211
ALBUQUERQUE, NEW MEXICO 87110

IN REPLY REFER TO
DES-80/25

JUN 06 1980

Memorandum

To: State Director, Bureau of Land Management
Santa Fe, New Mexico

From: Regional Director, South Central Region

Subject: Review of MAPCO's Rocky Mountain Liquid Hydrocarbons Draft Environmental Impact Statement

This responds to your request for our review and comments concerning the subject draft statement.

(1) The proposed route crosses an area southwest of Durango which has been acquired by the Colorado Division of Wildlife with matching assistance from the Land and Water Conservation Fund. The area is known as the Perins Peak Wildlife Area and includes about 7,550 acres roughly bounded by U.S. 160 on the north and east, Wildcat Canyon Road on the northwest, and the Southern Ute Indian Reservation on the south. Park and recreation areas receiving monies from the Fund are subject (in their entirety) to the provisions of Section 6(f) of the Land and Water Conservation Fund Act, as amended. This section of the Act requires that changes from the recreational use of the land be approved by the Secretary of the Interior. Any request for a change in land use at the Perins Peak Wildlife Area must be initiated by the Colorado Division of Wildlife through Mr. George T. O'Malley, Jr., Director, Division of Parks and Outdoor Recreation, Department of Natural Resources, 1313 Sherman Street, Room 618, Denver, Colorado 80203.

We suggest that consideration be given to other routes in the Durango area to avoid the Wildlife Area. However, we also suggest that you consult with the Water and Power Resources Service (WPRS), since the Animas-LaPlata project being considered by that agency would involve taking all or a large portion of the Perins Peak Wildlife Area for a reservoir. If this occurs, arrangements might be made to avoid the application of Section 6(f) to any right-of-way needed for the pipeline.

President Carter's August 2, 1979, "Memorandum for the Heads of Departments or Agencies" directs that:

(1) MAPCO has been in contact with the Colorado Division of Wildlife concerning these lands, and they are exploring the question of involvement of the provisions of Section 6(f) lands. Alternate routing through this area would be difficult due to topographic constraints.

(2) Each Federal agency shall, as part of its normal planning and environmental review process, take care to avoid or mitigate adverse effects on rivers identified in the Nationwide Inventory prepared by the Heritage Conservation and Recreation Service in the Department of the Interior. Agencies shall, as part of their normal environmental review process, consult with the Heritage Conservation and Recreation Service prior to taking actions which could effectively foreclose wild, scenic, or recreational river status on rivers in the Inventory.

The Nationwide Rivers Inventory is a two-phased screening process being conducted by the Heritage Conservation and Recreation Service to identify the best remaining free-flowing rivers in the nation that may merit protection at the Federal, State, or local level. Phase I of the inventory, focusing on streams or segments still in a relatively natural, undeveloped condition, has been completed nationwide. Phase II, which will consider such positive factors as recreation and wildlife values, is just being initiated in the western regions of HCRS.

The proposed pipeline would cross three segments of rivers which have been identified in Phase I: the Green River at Jensen, Utah; the Green River in Daggett County, Utah; and Fontenelle Creek west of Fontenelle, Wyoming. We recognize that avoidance of crossing at these river segments would be difficult. However, we urge that pipeline crossings of these river segments be carefully planned to minimize adverse aesthetic impacts to the river corridors.

The statement indicates that adequate measures have been and will be taken to assure compliance with 36 CFR 63 and 36 CFR 800.

Our screening of this project revealed no potential conflicts with Surplus Properties, designated or potential Natural or Historic Landmarks, or lands acquired or proposed for acquisition through the Federal Lands Acquisition program.

Rolland B. Handley

(2) Construction of the crossings would be accomplished in a manner to reduce adverse aesthetic impacts to these rivers. DEIS, page 1-19 indicates that specific construction design plans for major river crossings would be prepared. In addition, other river crossings may be subject to further site-specific stipulations.

20

United States Environmental Protection Agency

Region 8
Suite 103
1860 Lincoln St
Denver, CO 80295

Colorado, Montana
North Dakota,
South Dakota,
Utah, Wyoming

EPA JUN 4 1980

REF: 8W-EE

Robert Armstrong
BLM State Office, N.M.
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Armstrong:

EPA Region's VIII & VI have completed our review of the draft environmental impact statement (DEIS) on MAPCO's Rocky Mountain Liquid Hydrocarbon Pipeline. We offer the following comments for your consideration. The DEIS addresses most of the concerns expressed in our scoping letter of March 11, 1980. In our review of the DEIS we found several additional areas of concern.

(1) 1. The discussion of the need for the project should be expanded. Table 1-1 shows less than 25,000 BPD of NGL existing and proposed. This is substantially less than the 65,000 BPD stated as the collection and transportation goal of the project.

(2) 2. The EIS should analyze alternative delivery points such as Casper or Salt Lake City. These points would require much shorter lines than the proposed 1172 miles. The fact that 14 of the 17 listed NGL plants are North of the White River would seem to indicate a gathering system and a main line heading northeast to Casper or west to Salt Lake City might be appropriate. Also, how were the 18,000 BPD of NGL produced in 1979 used or transported?

(3) 3. Page 1-15 explains that a landscape plan is required on Forest Service lands. Although the DEIS states that reclamation and landscaping plans will be worked out between the authorized BLM officer, the land owners and the applicant, no minimum level of reclamation and landscaping appears to be established. We urge you to establish and commit to minimum landscaping and reclamation levels in the final EIS and to work out, at a later date, only such additional measures (above and beyond the minimum levels) as may be required at specific points in construction.

(4) 4. The DEIS correctly points out that a portion of the Green River has been proposed by the National Park Service for inclusion into the Wild and Scenic River System. However, there is no discussion as to what, if any, impact the construction of the Green River pipeline crossing would have on the possible Wild and Scenic designation of that portion of the river. Cleared areas of approximately "250 feet (river front) x 450 feet" needed for each side of the crossing could potentially affect both wild and scenic aspects of the river. The Green River stream crossing plan should be worked out with the National Park Service in advance to insure Wild and Scenic designation potential will not be impaired. When this is accomplished, a statement to that effect should be included in the FEIS.

(1) Presently, the natural gas liquids (NGL) that are being extracted in the area are largely being disposed of in whatever markets the shippers can find or they are being reinjected in anticipation of more economic means of disposal. In addition, gas production has been curtailed somewhat due to the lack of an available economic transportation system. By all estimates, the Overthrust Belt will have large gains in production in the near future. MAPCO is predicting that production will rise to 65,000 BPD within the next few years. The DEIS Purpose and Need section (DEIS, pages 1-3 and 1-7) has been expanded to clarify this point.

(2) Some of the NGL is used locally and some is being transported out of the area by truck or rail. Markets for these products in Casper and Salt Lake City are limited. The major markets for NGL are in the Texas Gulf Coast and the Midwest. An available distribution system to both the Texas coast and the Midwest already exists at Hobbs Station, Texas. This offers shippers the flexibility to serve both markets. See response to letter 20, comment 1.

(3) Committments by the applicant in DEIS Chapter One, which would become stipulations in the new grant, constitute minimum levels of reclamation. See the responses to letter 12, comments 21 and 22.

(4) Construction of this river crossing would not preclude its designation as a Wild and Scenic River. Since this segment of the Green River has been proposed for inclusion in the Wild and Scenic River System, special care would be taken in constructing and restoring the river crossing. Specific methods would be developed by the BLM, which is the surface management agency for this crossing. BLM has been a participant in the NPS study and is committed to retaining the scenic character of the river.

-2-

(5) 5. The DEIS explains on page 1-24 that any herbicides applied along the rights-of-way for the purpose of weed control would be EPA approved. The EIS should further emphasize that the application work conducted will be done under the careful scrutiny of a professional person, certified under existing EPA programs as a Certified Pesticide Applicator.

(6) 6. The DEIS explains on page 1-22 that the hydrostatic testing of the proposed pipeline would require about 15 acre-feet of water for each of five sections of laid pipe. The company does have a responsibility to apply for NPDES permits for any discharge of hydrostatic testing water to a surface water.

According to the procedures EPA uses to rate DEIS's, the MAPCO DEIS will be listed in the Federal Register as ER-2. This means that we have some environmental reservations regarding the project as presented in the DEIS and our areas of concern should be addressed in the final EIS. If you have any questions regarding our comments please contact Dennis Sonocki at FTS 327-4831.

Sincerely yours,

Roger W. Williams
Regional Administrator

cc: Region VI EE Coordinator

(5) This statement in the DEIS, page 1-24 has been changed to emphasize that a certified pesticide applicator would oversee the application of the herbicide.

(6) The applicant would obtain an NPDES permit where necessary for the discharge of hydrostatic test water. See DEIS, page 1-22.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
CENTER FOR DISEASE CONTROL
ATLANTA, GEORGIA 30333

June 4, 1980

Mr. Arthur W. Zimmerman
State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Zimmerman:

We have reviewed the Draft Environmental Impact Statement (EIS) on MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline. We are responding on behalf of the Public Health Service.

We understand the action proposed in this document will involve the construction of 1172 miles of a pipeline that will be used to transport liquid hydrocarbons. The construction of this project will impact the environment along certain areas of the planned route. However, the document addresses most of these impacts and states that the impacts will not be significant. Other Federal agencies have the regulatory authority in areas that will be significantly impacted and we will leave this to their cognizance.

(1) In our review we did not find any plans for the occupational health and safety of the workers who will be involved in the construction of the project. We feel this should be adequately addressed in the final EIS.

Thank you for the opportunity of reviewing this draft statement. We would appreciate receiving a copy of the final EIS when it is issued.

Sincerely yours,

Frank S. Lisella, Ph.D.
Chief, Environmental Affairs Group
Environmental Health Services Division
Bureau of State Services

(1) Provisions for health and safety of persons associated with construction, operation and maintenance of the pipeline project would be in compliance with applicable federal and state regulations.

22

DEPARTMENT OF HEALTH AND HUMAN SERVICES
REGION VIII
FEDERAL OFFICE BUILDING
1961 STOUT STREET
DENVER COLORADO 80294

June 3, 1980

PUBLIC HEALTH SERVICE

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 84501

Dear Sir:

The following comment is submitted concerning the Environmental Impact Statement for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline:

The proposed pipeline route, while passing fairly close to medical facilities at certain points, also will pass through some very remote areas. We suggest you review any emergency medical plans for accidents and injuries associated with the pipeline which might occur to workers or general population during and after construction of the pipeline.

Thank you for the opportunity to review the MAPCO Environmental Impact Statement.

Sincerely yours,

Hilary H. Connor, M.D.
Regional Health Administrator

(1) See response to letter 21, comment 1. This suggestion will be forwarded to MAPCO.

William J. Baurley
866 Broken Arrow Road
Roswell, New Mexico 88201

Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Attention: Mr. Arthur Zimmerman
State Director

Dear Mr. Zimmerman:

(1) Would you please advise me as to the results of the proposed MAPCO Rocky Mountain Liquid Hydrocarbon Pipeline project.

I am most interested in finding out more information on this project as I am an independent welding contractor and would be most interested in working on a project such as this one.

Thank you for your time and help.

Yours truly,

William J. Baurley

William J. Baurley

WJB/jb

(1) The record of decision will be made publically available after a decision has been made.

NORTHWEST PIPELINE CORPORATION

P.O. BOX 1526
SALT LAKE CITY, UTAH 84110
801-534-3600

June 5, 1980

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Director (922)
P.O. Box 1449
Santa Fe, New Mexico 87501

Re: MAPCO's Rocky Mountain
Liquid Hydrocarbons Pipeline

Dear Sir:

Northwest Pipeline Corporation supports the proposed MAPCO Liquid Hydrocarbon Pipeline Project as an energy-efficient and environmentally-acceptable method of transporting natural gas liquids that can provide benefits to the consumer and the petroleum industry.

The proposed project makes use of existing utility and transportation corridors to the extent practical as a means of minimizing potential effects to undisturbed areas and existing land use patterns.

The DEIS includes a good description of the natural, physical, and biological features of the existing environment, the potential impacts from the project, and the proposed mitigation of the potential impacts.

The unavoidable or irreversible effects are detailed sufficiently to allow assessment of such effects against the benefits that may accrue from the project.

(1) The proposed route, however, crosses or is adjacent to existing utility facilities. The description of the proposed action, under special siting considerations and special methods should include provisions for the coordination of all construction activities in close proximity to existing rights of way and facilties to protect such adjacent facilities, particularly underground pipelines.

Northwest Pipeline Corporation requests consideration be given to the potential effects of the proposed MAPCO Project to the future plans of Northwest for expansion, maintenance and operation of its existing system, including plans that may require extensive construction as the result of changes in the population-density in areas adjacent to the existing pipeline.

(1) The text has been changed to reflect that owners of existing ROWs and other facilities that would be crossed or adjacent to the project would be notified prior to start of construction. Construction requirements associated with adjacent ROWs would be observed and MAPCO would give consideration to future plans for expansion of adjacent pipelines.

Page two
New Mexico State Director

(1) cont. Northwest Pipeline Corporation has an existing program for crossing of Northwest facilities by other activities. This program has been formulated to provide protection to the general public as well as Northwest's facilities. Attachment "A" details Northwest's existing program for the crossing of its facilities. Northwest requests compliance of its existing program by MAPCO in the planning and construction of this project.

Northwest also requests for further protection that MAPCO increase its pipeline wall thickness and x-ray all welds within the parameters of Northwests existing right of way.

Northwest further requests that detailed planning for the MAPCO proposal address the possible effects to adjacent rights of way by construction and grading operations on the proposed right of way, and that alteration of existing drainage patterns by the proposed project be carefully evaluated.

(2) Effects of proposed stream crossing procedures and stream bed alteration on existing submerged river crossing should also be given detailed consideration.

In addition to the above general considerations, Northwest requests the following specific areas be reviewed:

(3)

- The Moab Canyon area in Utah has been identified as an area of concern for present and future right-of-way grants. Northwest has had discussions with the Utah State Office of the Bureau of Land Management regarding coordinated planning for routing of facilities in this congested corridor. Northwest proposes to continue to provide such coordination as required.

- The Douglas Pass Alternative in Colorado is included for further analysis. This area has been described as a potential landslide area. Northwest's existing main transmission line passes through Douglas Pass, and Northwest has had experience with past earth movements in the Dougals Pass area. Northwest requests to be given consideration in any further analysis of the Douglas Pass alternative.

- In the vicinity of MP480, San Juan National Forest, Colorado, a landslide area has been identified, Northwest has, during maintenance and operation provided protection to the existing main transmission line in this area for earth movements. Northwest requests coordination with further planning for the MAPCO project to limit effects to Northwest's existing facilities.

(2) Proposed construction at streambeds would be accomplished with care to avoid conflicts with existing facilities, including pipelines. The text has been changed (DEIS 1-15) to indicate coordination plans.

(3) On May 15, 1980 BLM Moab District Office sponsored a workshop and field review of the problems associated with the routing of utilities through Moab Canyon and around the city of Moab. At that workshop, MAPCO agreed to work closely with the Moab District Manager in siting the pipeline through this area (see DEIS page 1-27.)

Page three
New Mexico State Director

Northwest Pipeline Corporation appreciates the opportunity to provide comments on the proposed MAPCO project.

Repectfully,

NORTHWEST PIPELINE CORPORATION

W.A. Thomasson
Manager - Right of Way &
Environmental Affairs

WAT:tt

cc: Colorado State Director
Utah State Director
Wyoming State Director

Lee Roger Taylor, Jr.
4002 Madison Drive
Rock Springs, Wyoming 82901

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

May 30, 1980

Dear Sir:

I protest the BLM's proposed placement of the MAPCO pipeline - particularly through the Jesse Ewing Canyon.

As the governmental agency which holds in trust the management of public lands in this country, the BLM has - if the proposed plan is put into effect - foresaken its responsibility to the land, the environment, and the people. Forested lands are a rarity in Wyoming. To disrupt even momentarily the delicate ecological balance that has taken these forests decades or centuries to establish would do irreparable harm. Even if the area is "returned to its natural state," it would take a minimum of 50 years to restore its visual beauty - and that assumes that the balance can ever be restored.

Selecting a route up Highway 430 is considerably saner and more rational.

Respectfully,

Lee Roger Taylor, Jr.

REV. KEN WEIMER
BOX 20
Rock Springs, WYT. 82901

June 7, 1980

New Mexico State Director
of the BLM.
Sante Fe, New Mexico

Dear Sir:

I am writing in regards to the proposed Mapco Pipeline which is being proposed to be routed through the Little Mtn. - Pine Mtn. area of Sweetwater Co Wyo, as you know.
I plead with you to not allow this route to be used for the pipeline.
This aforesaid land is far to beautiful and unusual to allow it to be disturbed in such a proposed manner.

2

As you know, timber in this area is very sparse and this land supports deer, elk, and antelope populations not to mention many other forms of wildlife, and all of these vegitable and animal forms of life cannot be tampered with when other routes could be used for the Mapco line
Please, Sir, for the good of the people and their land rather than a large company and their concerns, I urge you to not allow the Mapco line to be put in the Little Mtn.-Pine Mtn. area

Sincerely,
Rev Ker Weimer

United States Department of the Interior
WATER AND POWER RESOURCES SERVICE
UPPER COLORADO REGION
DURANGO PROJECTS OFFICE
P.O. BOX 640
DURANGO, COLORADO 81301

IN REPLY REFER TO: 700
120.1/520.

JUN 9 1980

Memorandum

To: State Director, Bureau of Land Management
Santa Fe, New Mexico

From: Projects Manager, Durango Projects Office

Subject: Comments on the MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline Draft Environmental Statement

We have reviewed the Draft Environmental Statement for the proposed MAPCO pipeline and we have one comment.

Our concern is with the portion of MAPCO's proposed pipeline which parallels the existing 26" diameter Northwest Pipeline Corporation gas pipeline through Ridges Basin, located two miles southwest of Durango, Colorado. The proposed Animas-La Plata Project would utilize this basin as the primary storage reservoir for project water pumped from the Animas River. The pipeline route runs the length of the proposed reservoir basin, bisecting the damsite at the eastern end, and crossing the proposed Dryside Canal at the northwestern edge.

The Animas-La Plata Project was authorized for construction by the Colorado River Basin Act of September 30, 1968 (Public Law 90-537). Review of the project's Final Environmental Statement and Definite Plan Report are expected to be completed within two to three months. Finalization of these documents will culminate the advanced planning stage of the project. Although Congress has not yet appropriated funds to begin construction, funding could become available at any time.

A cost estimate for the relocation of the 26" pipeline around the edge of the reservoir basin has been included in the feasibility plan for the project. The cost for the realignment was determined as a result of several contacts with Northwest Pipeline Corporation representatives. Although a detailed field survey was not done, Northwest estimated that about 30,000 feet of pipe would be required for a relocation of the pipeline to the south of the reservoir. This route is along a steep hillside but avoids the reservoir's proposed inlet works and recreation facilities planned for the north shore.

(1) We would like to suggest that MAPCO contact the Northwest Pipeline Corporation to discuss a common right-of-way route around the proposed Ridges Basin Reservoir. The attached map of the reservoir area shows in red the alignment of the relocation route which was used in the estimate for the Definite Plan Report. Although, as suggested by MAPCO's Draft Environmental Statement, there are potential legal problems with shared right-of-way, construction could be considerably more economical with a joint effort.

(1) A copy of this letter has been forwarded to MAPCO for consideration. Please see the response to letter 19, comment 1.

We request that MAPCO stay flexible for as long as possible with the location of their pipeline route through the Ridges Basin area. We may know about construction funding for the Animas-La Plata Project by the time MAPCO is ready to install the pipeline through this area. The savings to this government financed project from minimized relocation costs would be beneficial to all taxpayers.

Thank you for the opportunity to comment on the Draft Environmental Statement. Please do not hesitate to contact us for any further information or discussion.

John D. Brown

Enclosure

28

1110 Continental St.
Rock Springs, Wyo.
82901

June 9, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Sante Fe, New Mexico 87501

Gentlemen:

I am writing to you with respect to MAPCO's proposed Rocky Mountain Liquid Hydrocarbons Pipeline. I wish to comment specifically on the sections of pipeline which extend from northern Utah into southwestern Wyoming.

I've worked for three years with another agency within the Department of Interior which deals with oil and gas development. During that period, I've coordinated environmental work and written environmental documents concerning oil and gas development, as well as pipelines, in southwestern Wyoming. Based on my familiarity of southwest Wyoming and experience with oil and gas, I feel I must write to you to you voicing my opposition to your agency's preferred alternative (Pine Mountain Alternative) as outlined in the draft Environmental Impact Statement (EIS).

Southwestern Wyoming is primarily an area of sagebrush plains drained by intermittent, alkalai draws. There are few forested areas with freshwater springs which offer a diversity of wildlife and recreation. Although areas such as Pine, Middle, and Little mountains may not be unique to northwestern Wyoming or northern Utah, they certainly are unique in southwestern Wyoming. Therefore, it is difficult to understand why some alternatives to the west were not fully considered because the U.S. Forest Service simply didn't want the pipeline on their lands, and then, the B.L.M. prefers to cross one of southwest Wyoming's few forested areas.

I further, do not view the B.L.M.'s preferred alternative as acceptable due to the physical nature of the Pine Mountain area. This area contains a number of steep, rock slopes and areas of severe soil instability. This is due to the steepness of slope (15% to 45%), the unconsolidated nature of the young, poorly developed soils, and the high shrink-swell potential of the clay

soils. These characteristics lend themselves to soil creep slumping, primarily in the spring, due to long freeze-thaw periods. This is also the period when the potential for pipeline breaks is greatest which coincides with time of year in which

(1) the Pine Mountain area is most inaccessible. The Pine Mountain area is generally inaccessible by vehicles from December through mid-May, which makes repairs of breaks and spill cleanup extremely difficult, if not impossible, at times. It is for this reason that I disagree with the draft EIS's statement regarding cleanup times (72 hours) in case of a break or spill.

Soils in the Pine Mountain area are very susceptible to erosion, primarily on unvegetated or disturbed slopes of greater than 5% to 7%. Rehabilitation of the rights-of-ways will be difficult due to slope and soil characteristics. As a result, the area would be left with a significant visual scar for 15 to 30 years.

The Pine Mountain alternative cuts through an area of elk winter range and mule deer summer range. In general, deer will adapt to such activities. However, man's actions near elk habitat have a more significant impact, primarily during calving seasons. The amount of habitat which would be removed from production on Pine Mountain, alone, would be approximately 60 acres.

(2) One part of the proposal which I feel was not adequately addressed for the preferred alternative was that of getting power to the Pine Mountain area for the rectifiers in the cathodic protection system. This impact will be more significant than addressed in the draft EIS. Also, project roads necessary for access on these projects will have a greater impact on the soils and erosion potential than was outlined.

The Little Mountain alternative poses similar potential impacts to the B.L.M.'s preferred alternative.

(3) I propose two alternatives which I feel merits consideration. The first of these is the proposal as initially proposed by MAPCO east of Little Mountain, near Wyoming 373. I realize this goes through the Red Creek badlands area which poses some severe erosion problems. However, for the cost of the additional 30 miles of routing over Pine Mountain, stringent erosion and sedimentation measures could be imposed. This could be in the form of mulching

(1) See the response to letter 12, comment 12.

(2) Rectifiers associated with the Cathodic Protection System would be located only where power presently exists. Existing access roads or the ROW itself would be used for construction and operation of the proposed project (see DEIS, page 1-10). This may necessitate upgrading of some existing roads and rehabilitation would be required as necessary.

(3) The East of Little Mountain Alternative (proposed action) was routed to avoid the soil stability problems encountered by Mountain Fuel as indicated in the DEIS appendix A on map 14 of 18, (MP840-844). During the same month of publication of the DEIS the WSU area was expanded to include the location through which the proposed action (East of Little Mountain) had been routed to avoid the Little Mountain landslide problem. Currently, therefore, the proposed action crosses the WSU for approximately 1 mile. The proposed action has been analyzed in detail and will be given serious consideration in the final decision (see FEIS summary, page 3).

(3) cont. the R4C-W's and using sediment traps and ponds. In order to avoid the stability problems encountered by the Mountain Fuel line, the line should be routed along the base of the slope of Richard's Mountain instead of attempting to stay along highway 373 part way up the slope. This would infringe on the Red Creek Wilderness Study Area (W.S.A.), although it would not impair the scenic vista of the area from the highway. In addition, the status of the Red Creek W.S.A. is somewhat questionable, due to administrative errors. This alternative would also be very accessible on a year-round basis for repairs and could utilize existing rights-of-ways. Overall, this alternative has problems, but I do not feel that the overall impact on soils, forestry, wildlife, people, recreation, and economics would be as severe as the Pine Mountain alternative.

(4) The second alternative which I offer is the best environmentally, but would be most costly for MAPCO. This alternative is to align the pipeline to the east after leaving Jesse Ewing canyon and follow Colorado highway 318 to southwest of Irish canyon. The pipeline could then follow north through Irish canyon to Wyoming 430 and stay near existing rights-of-ways to Rock Springs. This route would be very accessible for repairs all year long and the cost additions would not be as great as they may first appear. This is because spur lines coming from the east (Brady, Table Rock, and Red Desert areas) would not be as long. In addition, costs of difficult construction, maintenance, and rehabilitation would not be as high as the Little Mountain, east of Little Mountain, or Pine Mountain routes.

It is the B.L.M.'s responsibility to manage federal lands in the best interest of the people and the country. It is my opinion that if the B.L.M. chooses the Pine Mountain alternative, when more feasible alternatives exist, they have failed to live up to that responsibility. I earnestly hope that other alternatives will be considered prior to the writing of the final EIS and that the opinion of the people of southwestern Wyoming will be fully considered in your decision. I fully recognize the need for this pipeline in light of national energy needs, but I feel that better alternatives exist and hope that these ideas will be integrated into the assessment process in the spirit that NEPA and the CEQ

(4) A route following Highway 430 was screened from detailed analysis for the reasons explained in the response to letter 12 comment 4.

have intended them.

(5) Mention should also be made that copies of the draft EIS were not readily available to the public and that little public notice was given concerning the dates and times for the initial scoping meeting and the public hearing on May 22, 1980. The public meeting held on June 3, 1980 at the Rock Springs District B.L.M. office was better advertised.

Please send me a copy of the final EIS when it is completed. Please send to:

Chris Hanson
1110 Continental St.
Rock Springs, Wyo. 82901

Thank you for the opportunity to comment on this proposal.

Sincerely,

Chris E. Hanson

(5) Refer to the response to letter 17 for a summary of the efforts made to obtain public involvement during the review period.

THE UNIVERSITY OF NEW MEXICO ☐ ALBUQUERQUE, NEW MEXICO 87131
DEPARTMENT OF GEOLOGY ☐ TELEPHONE 505-277-4204

June 10, 1980

State Director,
Bureau of Land Management,
Santa Fe, N.M.,
P.O. Box 1449

Dear Sir;

I have read the MAPCO Rocky Mountain Liquid Hydrocarbons Pipeline Draft Environmental Impact Statement, which your office is assessing, and have some comments and suggestions to make on the New Mexico part of the statement. As a paleontologist familiar with the fossils likely to be found during construction of the pipeline, it is my opinion that the E.I.S.'s consideration of the impact to the paleontological resources, and particularly the mitigation of these impacts, is very insufficient.

(1) On page 2-1 & 2-2 the E.I.S. indicates that 86 miles of pipeline will go through the Nacimiento-Ojo Alamo Formations, 2 miles through the San Jose Formation, and 8 miles through the Fruitland Formation outcrops having "potential paleontological resources", namely vertebrate fossils. However, no inventory of paleontological sites has been made, and the only mitigation mentioned (p. 1-42) is that before construction "an inspection of areas having a high priority of containing fossils of exceptional scientific value <u>may</u> (my underline) be required in order to identify surface exposures of fossils". Important vertebrate fossils are well-known in the above-mentioned formations from many localities in the areas around the pipeline route. Because of this, I consider it imperative that the route be surveyed for significant fossils, and surface collections be made, before construction begins. In other words, the phrase "may be required" in the statement above should be replaced with "will be completed". The E.I.S. statement mentioned that an archaeological inventory was made several years ago. The paleontological resources in the area are as important in their way as the archaeological resources - why has no paleontological inventory been done?

Further, because excavation in the Nacimiento, San Jose, and Fruitland Formations could turn up unique or otherwise scientifically important fossils that would not be visible on the surface, I think it would be appropriate that the pipeline excavations through these formations be monitored semi-continuously by B.L.M. or other paleontologists as construction proceeds, to assure that significant specimens exposed in the excavations are not lost to science. This is certainly within the B.L.M.'s commission to adequately manage scientific resources, as spelled out in the Federal Land Policy and Management Act. There is a lot of discussion in the E.I.S. (p. 1-26, 27) on specific mitigation procedures for archaeological sites that might be uncovered during pipeline construction. There is no discussion of paleontological site mitigation. This inadequacy should be corrected

(1) The ROW grant would be accompanied by stipulations which would have to be complied with by the applicant. Stipulations are now being developed to potential mitigate paleontological impacts.

THE UNIVERSITY OF NEW MEXICO ☐ ALBUQUERQUE, NEW MEXICO 87131
DEPARTMENT OF GEOLOGY ☐ TELEPHONE 505-277-4204

before permission is given to begin pipeline construction.

(2) Secondly, "significant fossils" seems to be defined in the E.I.S. only in terms of vertebrate fossils. There is no mention of plants or invertebrates, which are known to occur in the formations mentioned above, as well as in numerous formations exposed along the route in the central and southeastern part of New Mexico. The marine Cretaceous and late Paleozoic formations containing fossils along this part of the route are ignored in the E.I.S. Although the chances of finding significant fossils are perhaps less here than in the northern formations, the possibility does exist, based on what is known of the fossils of these formations. I would suggest at least an inventory and survey of fossil deposits be made for all bedrock exposures along the route in central and southeastern New Mexico. Because a significant part of the route does not run through bedrock, and because the area of the route that will be affected by construction is very narrow, such a survey could be completed probably in a couple of weeks or less. In addition, a brief, occasional check by a paleontologist as construction is occurring, in areas previously identified from surface inspection as being fossiliferous, would suffice to determine that significant paleontological materials are not being destroyed.

(3) Thirdly, some parts of the route go through areas identified on the state geologic map as being Quaternary (unconsolidated) deposits. These deposits are similar, particularly in Lea and Chaves Counties, to deposits in the Clovis area that have yielded Pleistocene vertebrates, occasionally in association with human artifacts. Such fossil deposits might not be visible on the surface but could be exposed during pipeline construction. Late Pleistocene fossil vertebrate/human occurrences are of great importance archaeologically as well as paleontologically, and some procedures for handling deposits of this type (Pleistocene vertebrates, with or without associated human artifacts) ought, in my opinion, to be specifically incorporated into mitigation requirements. A program similar to that for cultural resources (p. 1-26,27) could be developed, with provisions for reporting such deposits to the B.L.M. and/or state officials, and for clearance of these sites by professional paleontologists (and archaeologists, if human artifacts are present).

I hope these suggestions have been helpful, and that they, or some adequate modification of them, will be incorporated in the final E.I.S. and final construction plan.

Sincerely,

Barry S. Kues

Barry S. Kues
Associate Pforessor of
Geology

(2) Necessary paleontological surveys would be conducted prior to construction on public lands.

(3) Pleistocene vertebrate fossils would be evaluated in a survey as described in the response to letter 29, comment 2.

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

Memorandum

MAY 5 1980

To: State Director (922), Bureau of Land Management
Santa Fe, New Mexico

Through: Assistant Secretary--Energy and Minerals

From: Director, Geological Survey

Subject: Review of draft environmental statement for MAPCO's Rocky Mountain liquid hydrocarbons pipeline, Texas, New Mexico, Colorado, Utah, and Wyoming

We have reviewed the draft statement as requested in your notice.

(1) We suggest consideration of the potential for effects on ground-water movement, quality, and recharge from lateral migration through the pipeline trench backfill where aquifers or active recharge areas are intercepted by the trenches.

for H. William Menard

cc:
AS/EM(2)
Advance, BLM
S. Chiang, CO MS630
Gen. Files, MS114, Reston
Dir. Chron.
RB
EGS:LBONHAM:af:5-28-80

(1) It is possible that a slight increase or decrease in recharge could occur from lateral migration of water in the trench. The trench depth, characteristics of backfill material, degree of compaction, characteristics of the bottom of the trench, slope of trench, surface slope, surface cover, precipitation, and cut and fill methods could all have some effect upon recharge. The relatively narrow ditch width (14 to 28 inches) and shallow depth (43 to 51 inches) indicate that impacts would be expected to be insignificant.

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May 28, 1980

BLM State Director
Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

(1) As long-term residents of Sweetwater County, we are very concerned about the BLM decision to allow MAPCO to build a pipeline right of way over Pine Mountain or Little Mountain.

The forests in this area are very precious because there is so little. We are concerned that the only local elk herds will lose more habitat. We simply can't understand the rational behind the MAPCO-BLM proposal to lay the pipeline under the Green River.

We ask that you reconsider the route and take the pipeline up highway 430 where it would avoid our forests and that you suspend the pipeline over the Green River.

Sincerely,

Paul Thompson

Paul & Jean Thompson

Jean Thompson

(1) Responses to each of the comments presented in this letter have been previously given. Refer to the response to letter 12, comments 4, 9, 13 and 29.

STATE OF UTAH
Scott M. Matheson
Governor
Kent Briggs
State Planning Coordinator

Division of Policy and Planning Coordination
Intergovernmental Relations Section
Loreyne Tempest, Associate State Planning Coordinator
124 State Capitol
Salt Lake City, Utah 84111
533-4981

A/95
State Clearinghouse
533-4976
533-4971

Environmental
Coordinating
Committee
533-5794

Human Resources
Coordinating
Committee
533-4981

A/85
Federal/State
Coordination
533-6083

Federal Resource
Information
Center
533-4983

June 12, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

SUBJECT: Draft EIS, MARCO's Rocky Mountain Liquid Hydrocarbons Pipeline. (SAI #800428098)

Dear Sir:

The Utah State Environmental Coordinating Committee has reviewed the information in the Draft EIS, MARCO's Rocky Mountain Liquid Hydrocarbons Pipeline. The Committee has found no discrepancy with existing state plans and objectives.

Agencies choosing to comment at this time are the Division of State History, and the Division of Wildlife Resources. While the former comments are enclosed, the latter, expressing concern over wildlife migration between Utah and Wyoming, will be mailed to you under seperate cover.

Committee members would like to thank you for the opportunity to review this material; it is helpful in the forming of Ideas on the proposed action.

Sincerely,

Lee M. Allen
A-95 Coordinator

LMA:ba
Enclosure

32a

SCOTT M. MATHESON
GOVERNOR

STATE OF UTAH
DEPARTMENT OF COMMUNITY AND
ECONOMIC DEVELOPMENT

Division of
State History
(UTAH STATE HISTORICAL SOCIETY)

MELVIN T. SMITH, DIRECTOR
307 WEST 200 SOUTH
SALT LAKE CITY, UTAH 84101
TELEPHONE 801-533-5755

April 2, 1980

Chairperson
Environmental Coordinating Committee
State Planning Office
118 State Capitol
Salt Lake City, Utah 84114

RE: MAPCO Liquid Hydrocarbon Pipeline, Concurrance with March 1980 Draft.

Dear Chairperson:

In response to your request for review and in accordance with your responsibility as outlined in 36 CFR 800.4 we are happy to consult with you concerning your project.

The staff has determined, after review, that if the stated procedures, projects or regulations are followed as outlined, there will be no known effect upon any potential or listed National Register historic, archeological or cultural sites.

If you have any questions or concerns, please contact James L. Dykman, Compliance Administrator, or Wilson G. Martin, Preservation Development Coordinator, Utah State Historical Society, 307 West 200 South, Salt Lake City, Utah 84101, 533-6017.

Sincerely,

Melvin T. Smith
Director and
State Historic Preservation Officer

JLD:re: C597 Multi

(3) Concur with findings/recommendations

cc: Frances Levine, US Dept. of Interior, BLM, P.O. Box 1449, Santa Fe, New Mexico 87501

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Wilderness Workshop
of the Colorado Open Space Council

2239 East Colfax Avenue. Denver. Colorado 80206 • (303) 399-WILD

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

June 10,1980

Sir,

I am commenting on the proposed MAPCO Rocky Mountain Liquid Hydrocarbon Pipeline Draft Environmental Impact Statement of April, 1980 for the Wilderness Workshop of the Colorado Open Space Council, Colorado's statewide wilderness organization. (page numbers refer to pages in the DES)

We are very concerned about the following aspects of the DES, and request that these issues be adequately addressed in the FES:

(1) 1) The effect of the project on endangered and threatened species of wildlife and plants, specifically in the river crossings of the Colorado and Green Rivers, where the Colorado Squawfish, the Razorback Sucker, and the Humpback Chub reside. The effects on these endangered fish of construction disturbance, resulting siltation in the rivers, and stability of the river bottoms after construction all need to be addressed in the FES.

A detailed assessment of the effects of this project on wildlife needs to be a part of the FES.

(2) 2) An assessment of the effects of the proposed river crossing of the Green River at mile 822 in Brown's Park (p 1-7) on the Green's proposed status under the Wild & Scenic Rivers Act, as well as the environmental effects (mentionned in 1) above) of the project at this crossing should be given much closer attention in the FES.

(3) 3) The Right of Way maintenance plan for Forest Service lands (p 1-15) should be developed previous to the construction phase of the project , and incorporated in the FES.

(4) 4) Detailed plans for prevention of leaks and/or breaks in or near the river crossings should be presented in the FES, with special attention given to the effects of breaks and/or leaks on the endangered flora and fauna in or near the river crossings.

While the DES mentions many of these issues, it gives them only cursory examination, and does not satisfy the accuracy criterion of the National Environmental Policy Act for Environmental Impact Statements. We therefore request that these issues be fully addressed in the FES on MAPCO's proposed pipeline.

Thank you,

Norman J. Mullen
Colorado Open Space Council
Wilderness Workshop.

(1) The draft biological assessment has been prepared and is being submitted to the Fish and Wildlife Service. The effects of temporary disturbance to river bottoms and siltation in the rivers resulting from construction are addressed in the biological assessment. The analysis contained in the biological assessment and the Fish and Wildlife Service's biological opinion will be fully considered in the decision making process. An addition to the text (DEIS, page 3-8) has been made.

A detailed assessment of the effects of this project on wildlife is contained in the MAPCO EIS background file available for public review at the BLM New Mexico State Office in Santa Fe, NM.

(2) Refer to letter 20, comment 4 and letter 33, comment 1.

(3) Based on site-specific information, stipulations would be developed and attached to the ROW grant. A detailed maintenance plan would be required from the applicant which would incorporate these stipulations. See letter 12, comment 22.

(4) See letter 12, comment 13 and letter 33, comment 1.

WYOMING WILDLIFE FEDERATION

311 W. Flaming Gorge Way
Green River, Wy 82935
June 5, 1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, NM 87501

Dear Mr. Woodard:

I have reviewed the MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline EIS and would like to offer the following comments for your consideration.

(1) In my opinion, the MAPCO Draft EIS, does not comply with the legislative intent of the National Environmental Policy Act (NEPA). The BLM preferred Wyoming alternative (Pine Mt. Alternative) would create a new utility corridor when several existing corridors exist that this pipeline could follow.

Sweetwater County, Wyoming could be generally characterized as high desert county. Only 6,000 acres or 0.1% of Sweetwater County is forested. It seems inconceivable that the BLM would propose that the MAPCO pipeline be routed through our small forested areas.

(2) I am sure that you are aware that diversity of habitat is the key to healthy and diverse wildlife populations. The distruction or modification of the small forested areas in Sweetwater County could have severe negative impacts on wildlife, such as elk, that depend on forested areas for escape cover, food, shelter, calving grounds, etc. The BLM proposed route, transects the tri-state elk herd summer range, and also passes through an area that the Wyoming Game and Fish Dept. has designated as critical elk winter range. Seventy to eighty percent of the tri-state elk herd, winters in this area.

(1) The comments expressed in this letter have been previously discussed in responses to other letters. Please see responses to letter 12, comments 4, 8 and 9.

(2) See response to letter 12, comment 29.

page 2

(3) I realize that this one pipeline would not severely impact wildlife habitat in this area. However the new right-of-way corridor would invite other companies to use the route, not to mention the increased access to the area that the pipeline would almost certainly provide.

(4) Negative impacts such as visual impacts, not following existing ROW's and soil problems seem to be the major reasons for rejecting most of the alternatives. The Pine Mountain route does not follow an existing ROW, clear cutting a strip through a forest would certainly cause visual impacts for a considerable length of time, not the 3 to 5 years as stated in the EIS, and routing the pipeline up a steep 9,700 foot mountain would in all likelyhood cause soil erosion or slippage.

(5) Winter maintenance that may become necessary, would be extremely difficult on the steep snow covered slopes of Pine or Little mountain. Major environmental impacts would also occure due to heavy equipment needed for snow removal.

For these reasons i would like the following alternatives to receive attention. These alternatives deal with available routes from mile post 800 northward, mainly in Wyoming.

(6) 1. Beginning at the Browns Park Bridge cross the Green River, above the water, using the existing bridge or utilizing a new structure, then following the existing highway northeast to highway 430, through Irish Canyon then north to milepost 50 where a Mountain Fuel pipeline crosses the highway, then northwest along the existing ROW to the intersection with the Pine Mountain alternative at milepost 938 then continuing to the South Baxter Station.

(7) 2. In depth consideration should be given to the company proposal (east of Little Mountain) with the exception of deviating from the proposed route either east or west around the slide area on Little Mountain then rejoining the proposed action.

I appreciate the opportunity to comment on one of my favorite areas of Wyoming.

Sincerely yours,

Ronald K. Smith

Ronald K. Smith, Chairman
Natural Resources Committee

cc: Luke Manielson
Dwight Smith
Bob Rogers
George Kaminski

(3) See response to letter 12, comment 9, 11.

(4) See responses to letter 12, comments 5, 9 and 24-27.

(5) See responses to letter 12, comments 10 and 12.

(6) See response to letter 12, comment 4.

(7) See responses to letter 12, comment 2 and letter 28, comment 2.

UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Productivity, Technology, and Innovation
Washington, D.C. 20230
(202) 378-3848 4335

June 11, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

This is in reference to your environmental impact statement entitled "MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline." The enclosed comments from the National Oceanic and Atmospheric Administration are forwarded for your consideration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving eight (8) copies of the final environmental impact statement.

Sincerely,

Bruce R. Barrett
Acting Director, Office of
Environmental Affairs

Enclosure Memo from: Mr. Robert B. Rollins
National Ocean Survey
NOAA

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SURVEY
Rockville, Md. 20852

MAY [illegible] 30

OA/C52x6:JLR

TO: PP/EC - Joyce M. Wood

FROM: OA/C5 - Robert B. Rollins

SUBJECT: DEIS #8004.30 - MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline

The subject statement has been reviewed within the areas of the National Ocean Survey's (NOS) responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

(1) Geodetic control survey monuments may be located in the proposed project area. If there is any planned activity which will disturb or destroy these monuments, NOS requires not less than 90 days' notification in advance of such activity in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation required for NOS monuments.

Attachment
DEIS #8004.30 (File Copy)

(1) The DEIS, page 1-27, under "public monuments and markers" states: "If the removal of monuments or markers becomes necessary during specific construction activities, the applicant would advise the appropriate agency of that need." Necessary relocations would be made at the applicant's expense.

THE STATE OF WYOMING

Commissioner of Public Lands and Farm Loans

2424 PIONEER AVENUE
PIONEER BUILDING

CHEYENNE, WYOMING 82002

PLEASE ADDRESS REPLY
TO THE COMMISSIONER

June 12, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

Reference DEIS for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline, please select a route that will assure the maintenance of existing tree cover on non-federal lands in Wyoming, so that watershed and wildlife values will be protected.

(1) It is further requested that you initiate and maintain liaison with Mr. Bart Trucano, District Forester, Wyoming District Land Office, P. O. Box 815, Evanston, WY 82930 Tel. 307-789-9721, regarding State land. Mr. Trucano will need to appraise resource values and develop recommendations for site rehabilitation on State lands.

Right-of-way permits must also be obtained from the Commissioner of Public Lands, Cheyenne, prior to any access across or before construction on lands owned by the State of Wyoming and must comply with the terms set forth in the State permit.

Thank you for the opportunity to comment.

Very truly yours,

Carl E. Johnson
State Forester

BEL:ml

(1) This suggestion and requirement have been forwarded to MAPCO.

United States Department of Agriculture
Soil Conservation Service
P. O. Box 648
Temple, TX
76501

June 11, 1980

Mr. Arthur W. Zimmerman
State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, NM 87501

Dear Mr. Zimmerman:

We have reviewed the draft environmental impact statement for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline and do not feel that this project will result in any significant adverse impacts on the soil, water, and plant resources on that segment of the line passing through Texas.

Sincerely,

George C. Marks

George C. Marks
State Conservationist

National Wildlife Federation

NATURAL RESOURCE CLINIC
FLEMING LAW BUILDING
BOULDER COLORADO 80309
303-492-5551

June 13, 1980

Mr. Arthur W. Zimmerman
State Director (922)
Bureau of Land Management
New Mexico State Office
P.O. Box 1449
Sante Fe, NM 87501

Re: MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline DEIS

Dear Mr. Zimmerman:

On behalf of the National Wildlife Federation I am pleased to submit the following comments on the Bureau of Land Management's Draft Environmental Impact Statement on MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline. The National Wildlife Federation, with over 4.5 million members and supporters, is America's largest conservation organization. These comments were developed with the assistance of our affiliates in New Mexico, Utah, Colorado, and Wyoming.

In general, we believe that the DEIS does not adequately address the issue of impacts on wildlife that will result from the proposed action. In the few instances where they are discussed, the conclusion that those impacts will be insignificant is often reached without reference to the background information on which the Bureau of Land Management is relying. The same treatment has been given to the analysis of impacts on the land, vegetation, and rivers and streams along the route. Before a decision can be made based on the environmental consequences of the actions and alternatives, those consequences must be fully analyzed and understood. We believe that the DEIS will require extensive supplementation before a Final EIS based on it can be considered adequate. The following comments address those specific areas in which we believe the DEIS requires further development.

1. General Comments

(1) a. Statements are made throughout the DEIS without reference to what, if any, background information they rely on.

Mr. Arthur W. Zimmerman
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June 13, 1980

(1) This is particularly true in the analysis of wildlife impacts. CEQ regulations at 40 C.F.R. § 1502.21 (1978) allow agencies to cut down on the bulk of an EIS by incorporating material by reference and citing that material, as well as briefly describing its contents. This material must also be available for inspection by interested parties. Although the references section in the DEIS includes a list of sources, what information they were relied on for is not indicated, nor does it appear from the titles or individuals listed that any of them served as wildlife information sources. The only references given for biological information are those for threatened and endangered species, and for two tables listing Crucial Wildlife Use Areas and Periods to avoid Construction. Even those references list only individuals and not publications. Table 1-12, Summary of Significant Impacts for Proposed Action and Alternatives, gives almost the exclusive information on impacts on wildlife, with no basis, references, background information, etc. Baseline information relied on in preparation of the DEIS must be indicated as required in order to allow for informed review and effective decisionmaking.

(2) b. The maps in Appendix A, showing the proposed route of the pipeline, do not provide sufficient information to allow informed comment on routing decisions.

(3) (1) Much of the route of the pipeline, according to the Legend, is "Near Existing Road, Railroad, Pipeline or other Utility." In many instances it cannot be discerned from those maps, or even from the 7.5' USGS Topographic Maps of the same region exactly what form of utility is being followed, if one is being followed at all, or how "near" to that utility the pipeline runs. In other words, the question remains as to whether the proposed route lies within an already cleared corridor or merely in the vicinity of one. There may be a very substantial difference in the resulting impacts depending on the answers to these questions. Without more information, our comment must be limited to stating the importance of routing the pipeline within existing corridors whenever possible, and more specifically within those corridors which will result in the least disturbance of wildlife and the environment in general.

(4) (2) The Legend also indicates that much of the route follows existing MAPCO R.O.W. According to the New Mexico Bureau of Land Management office that right-of-way contains the Northwest Pipeline for most of the route. More information on that pipeline should be included in the DEIS--at least a brief description of its characteristics and uses. It is not clear from the DEIS at what point the proposed pipeline follows a right-of-way with an existing pipeline or an

(1) The background information is in the MAPCO EIS file, available for public review at the BLM New Mexico State Office in Santa Fe. As required by 40 CFR 1502.15, an attempt has been made to include and present data and analysis in the DEIS "...commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced...." Determination of significance was begun in the scoping process as per 40 CFR 150.17 (2) (3). The reference section in the DEIS included only those citations referenced in the text of the DEIS. A brief description of the content of the background file follows:

- Identification of wildlife resources determined to be of particular concern through the scoping process. The two categories identified as having the greatest concern were game species and species classified as threatened or endangered.
- Identification of habitat types traversed by the proposed pipeline route and alternatives. Habitat types are identified by mile post in the vegetation section of the background file.
- A list of several common species associated with each habitat type. Identification of wildlife species lists available in publications, in state or regional offices of various wildlife agencies, and BLM and FS offices along the route.
- Identification of crucial wildlife use areas and season of use as submitted by various BLM, FS, and state wildlife agency personnel. Crucial use areas are identified by mile post.
- Definitions for analytic criteria utilized for impact determination. (A brief description of these criteria appears on page 3-3 of the DEIS.)
- Application of the analytical criteria and an impact determination based on the description of the proposed action and alternatives as presented in Chapter One of the DEIS.
- The same type of information has been obtained for federally listed threatened or endangered species, as well as state listed and legislatively protected species. This material is also available for public review at the BLM New Mexico State Office in Santa Fe (MAPCO EIS background file).

(2) The intent of the maps in Appendix A is to show the general alignment of the proposal, locations of related facilities, land ownership and approximate areas where the proposed line is near existing ROWS. Larger scale maps are available at all BLM district offices along the route. In many cases, the detailed maps were used to solicit information from agency personnel and the public.

(3) MAPCO has attempted to locate its proposed pipeline adjacent to existing utilities. A definition of "near" was developed to allow some necessary flexibility in on-the-ground siting. Where possible, they plan to locate adjacent to the existing ROWS; however, physical or other barriers may necessitate slight deviations. Site-specific variations would be handled through stipulations and on-the-ground inspection prior to and during construction. Regarding availability of more detailed maps, see response to this letter, comment 2.

(4) MAPCO has an existing pipeline in its ROW from Hobbs Station, Texas to Kutz Canyon, New Mexico (MP O-415.5). For this portion of the line they propose to locate <u>within</u> the already developed ROW. For background information on the coincidence of the Northwest pipeline and the MAPCO proposal, see the letter and response to letter 24.

Mr. Arthur W. Zimmerman
Page 3
June 13, 1980

(4) cont. as-yet unused right-of-way grant. Yet this obviously makes a significant difference in determining environmental impacts. The Final EIS should include enough specific information so that environmental impacts of routing decisions can be realistically evaluated in the decisionmaking process.

(5) (3) We have been told that the definition of "near" as used in the map Legend is that two individuals, one standing on each of the two utilities in question, would be able to see each other. If there are obstructions blocking the view, even if the utilities are within 10 feet of each other, they would no longer be deemed near to each other. Relying on a definition which is so vague, as well as subject to constant change in meaning according to the nature of the surrounding land, makes it impossible to judge whether the new route will run within, or even close to, the already disturbed land. Furthermore, the distance at which two individuals are within sight of each other can be very great, and if used as a crition for allowing construction would necessarily result in the creation of new corridors and new disturbance of land and wildlife. If the DEIS's determination of nearness to an existing route is to be used as a justification of routing decisions that definition must be stated in the Final EIS and must be accurate and specific so that impacts of the route proposed and alternatives can be weighed effectively.

(6) (4) In several instances the proposed route appears to veer away from a visible road or utility either to follow a utility that does not show on the map or to run through undisturbed land. An explanation of the reasons for these routing decisions should be included in the Final EIS.

c. Wildlife Impacts.

(7) (1) The DEIS states that a biological assessment is currently being done on potential effects on threatened and endangered species (p. 2-3). It is imperative that that assessment be included in the Final EIS and that it address state-listed species as well as federally-listed species. If the mandate of the Endangered Species Act of 1973 is that all federal departments seek to conserve endangered and threatened species, the effects on those species of the proposed action must be specifically included in the Final EIS in order to effectuate it. 40 C.F.R. § 1502.25 requires that this assessment be prepared concurrently and integrated with the EIS to the fullest extent possible. That assessment should have been included, therefore, in the DEIS. In light of the failure to so include it, it becomes even more important that a thorough biological assessment be part of the Final EIS.

(5) As stated in the response to letter 38, comment 3, the definition of "near" was developed to allow flexibility in site-specific routing decisions. Because center line engineering surveys and the cultural resources inventory have not been completed, a site-specific final route cannot be defined at this time. Under ideal circumstances 2 pipelines would not be located closer than 10 feet. The alignment would be known by the time site-specific stipulations were established for the ROW grant.

(6) Without specific references to the areas in question on the maps, a specific answer is not possible. Generally, route deviations from existing ROWS represent areas where: a) a resource impact is being avoided (especially for visual impacts); b) some sort of barrier must be avoided; c) where routing to get to another ROW that trends in the right direction is necessary.

(7) A discussion of the relationship of the biological assessment to the NEPA process for this project appears in the response to letter 33, comment 1. The biological assessment would be an integral component of the final decision-making process.

Mr. Arthur W. Zimmerman
Page 4
June 13, 1980

(8) (2) The DEIS includes Tables 1-8 and 1-11 which list Crucial Wildlife Use Areas and Periods to Avoid Construction, for the proposed action and alternatives. This is almost the exclusive discussion of impacts on wildlife contained in the DEIS. The Table is apparently based on the conclusion that disturbance during these crucial periods is the only possible cause of detrimental impacts on wildlife. The Final EIS should consider the following questions:

(9) (a) Is a more serious problem the creation of a new or larger corridor? Possible impacts may result from increased human access into these areas. This issue is addressed in the DEIS (p. 1-42) where it is suggested that vehicle barriers be constructed where necessary. We believe the necessity of this mitigation measure should be analyzed in the Final EIS for each of these crucial areas and should be made an absolute requirement where necessary.

(b) Where a new or broader corridor is created, won't the likelihood of further use of the corridor for other utilities be increased resulting in additional impact on wildlife?

(c) Both of the preceding two questions should also be analyzed in terms of effects on habitat and other values of land now in a primitive state.

(10) (d) What are the possible impacts of alterations in vegetation within these crucial use areas? It is doubtful that vegetation can be reestablished within the period during which impacts are considered safe (see comments on revegetation below). Some analysis must be made of the impacts on the subsequent crucial use period of these changes in vegetation.

(11) (e) The Final EIS should discuss the possible impacts of necessary pipeline maintenance or ruptures on these crucial wildlife use areas.

(12) (3) On page 1-24 of the DEIS it is stated that herbicides will be used within the fences at pump stations to prevent fires, and in front of right-of-way safety signs to ensure that they remain visible. There is no discussion of what herbicides will be used or of the potential impacts of their use. Nor is there any indication that alternatives were considered. These issues should be addressed in the Final EIS.

(13) (4) Page 3-3 of the DEIS states the criteria for finding an insignificant impact on wildlife, resulting from vegetation and surface disturbance. If no more than 1% of the total crucial habitat within the geographic area (20-mile corridor) is expected to be disturbed or if the disturbance is

(8) The tables are not intended to imply that such a conclusion has been drawn. The tables reflect the applicant's willingness to avoid construction in those identified crucial areas during their season of crucial use, thus greatly reducing the potential for the impact to occur.

(9) (a) With respect to corridor analysis, see responses to comments 6, 8, 9 in letter 12. With respect to vehicle barriers, see the response to letter 13, comment 3. BLM personnel would be conducting on-the-ground inspections during construction. The need for vehicle barriers would be established at that time.

(b) With respect to the potential for increasing impacts on wildlife, the following recommendation was presented to Wyoming, Utah and Colorado BLM: In light of the magnitude of energy-related activities in the overthrust area, a multi-state, multi-agency corridor plan and analysis should be conducted. Corridor sensitivities should be considered and utility thresholds established for each corridor. Use of that proposed location for additional utilities is dependent on subsequent environmental analysis and other considerations if and when more utilities are proposed.

(c) See response to (a) and (b) above.

(10) (d) This analysis was conducted and the resultant impacts were not found to be signifient, and were therefore not presented in the DEIS. See pages 2-1 and 3-3 of the DEIS. The impact analysis is available for review at NMSO, Santa Fe.

(11) With respect to maintenance and ruptures, see the response to comments 11, 12 and 13 in letter 12. As stated in the DEIS: "Saturation of the soil by natural gasoline or normal butane would be confined to no more than an acre of land." This means that damage to soils and vegetation or wildlife habitat would also be confined to this area. The amount of habitat destruction resulting from a rupture (compared to that available) would be extremely small.

Mr. Arthur W. Zimmerman
Page 5
June 13, 1980

(13) cont. expected to be greater than 1% but the impact is expected to be beneficial or short-term (one year or less) that impact is deemed to be insignificant. This treatment of impacts on wildlife is inadequate as well as offered without explanation of how it was reached. A severe impact even if lasting only one day, can irreversibly destroy wildlife habitat. Similarly, a minor impact at a critical point can also result in serious problems. The analysis of wildlife impacts must be based on more realistic criteria in the Final EIS. Furthermore, there is no discussion of what wildlife exists within the proposed right-of-way except for those mentioned in the crucial use area tables. Isn't it critical to know what species exist within the area in order to be able to predict impacts?

d. Impacts on vegetation and soils.

(14) (1) The DEIS states that the applicant will do whatever is necessary to ensure proper revegetation of the right-of-way (p. 1-22). While this is reassuring, it falls far short of the description of specific measures we believe to be necessary. The effects of vegetation disturbance and the possibility of resulting erosion can and will create serious impacts on wildlife as well as the environment within and near the right-of-way. Planning must be aimed at avoiding these impacts and ensuring that through inclusion of specific and enforceable requirements in the right-of-way grant, they will be avoided. This would include a listing of what species will be used and requirements that they be both native to the area and provide good forage and cover for wildlife.

(15) (2) The DEIS frequently refers to a goal of revegetation within one year. It takes at least three years and may take up to 15 to revegetate an area the size of the right-of-way (per conversation with Phil Freeman of the New Mexico Game & Fish Department, Planning Office). Impact analysis of the proposed action must be based on a more realistic assessment of the time period required to revegetate and must include the secondary impacts on wildlife that this delay will result in.

(16) e. Impacts on water resources and aquatic and riparian habitat.

(1) The criteria for determining impacts on water resources stated on page 3-3 are inadequate. For instance, the criterion for measuring significant impacts from ruptures and spills is limited to possible contamination of the municipal water supply. No consideration is given to the effects on the stream or its inhabitants. An analysis of these effects must be included in the Final EIS.

(12) The herbicide that MAPCO proposes to use is an EPA and DOI approved granular herbicide known as Ureabor. The active ingredients are:

68.5% Sodium Metaborate Tetrahydrate ($NA_2B_2O_4 \cdot 4H_2O$)
2% Boron Trioxide (B_2O_3)
30% Sodium Chlorate ($NaClO_3$)
1.5% Bromacil (5-Bromo-3-Sec Butyl-6-Methyluracil)

This herbicide is applied by hand to an area using a hand pump sprayer within the pump stations limits, where the ROW safety signs have become obstructed by weeds, and along non-maintained roadways. Because of the relatively small amounts to be used and the localized area of application, no significant impacts are anticipated; therefore, no alternatives to the type of herbicide or method of weed control were considered (also see the response to comment 5, letter 20).

(13) It was necessary to establish a scale on which impacts could be measured to determine relative significance. This scale was based on experience and professional judgement. Significant impacts were not identified for either critical wildlife areas or short-term duration along the proposed action or alternatives. A more detailed explanation is available for review in the MAPCO EIS background file at the NMSO. With respect to species lists refer to letter 38, comment 1.

(14) Stipulations are being developed by each BLM and FS district along the proposed route to deal with site-specific, on-the-ground problems. These stipulations would be included in the ROW grant. Examples may include specific seed mixes, vehicle barriers to minimize wildlife harrassment and enhance revegetation, and erosion control devices. These stipulations would ensure that public lands would be satisfactorily restored.

(15) The goal of revegetation within 1 year refers to the establishment of a vegetative cover as used for soils analysis (Factor C) in the Universal Soil Loss Equation (USLE) in order to estimate soil loss in acres per year. Different revegetation schedules for each fo the vegetative types were used. The curve used for extrapolation of cover over the expected revegetation period for any given year is hyperbolic rather than linear, making the estimate of revegetation more conservative. The complete analysis for revegetation and soil loss may be found in the MAPCO EIS background file at the BLM New Mexico State Office in Santa Fe.

Mr. Arthur W. Zimmerman
Page 6
June 13, 1980

(16) cont. Surface water quality is treated under criterion that considers only increases in sedimentation. Run-off from the staging areas has been recognized as a result of construction of river crossings. There is no reason for not considering this run-off in measuring the effects of the proposed action on surface water quality.

(17) (2) Page 1-30 describes the procedure to be employed in case of a spill at a stream crossing when the temperature is 32°F or below. This is considered the worst case for potential stream contamination. The Final EIS should contain some discussion of the adequacy of these measures. It should also include measures for spills into streams under other conditions. A solution offered for the "worst case" does not satisfy us that one exists for other cases. One suggested means of protecting streams and rivers is the use of automatic shut-off valves at both sides of river crossings. Another is encasing the pipeline in concrete at river crossings. These alternatives should be discussed in the Final EIS.

(18) (3) The DEIS at page 1-42 includes suggested measures to mitigate adverse effects to riparian habitat and aquatic life. Some discussion of the sufficiency of these measures should be included in the Final EIS.

(19) (4) The Final EIS should also include an analysis of whether stream crossings should be allowed within an area in which endangered or threatened species are found.

(20) (5) On page 3-5 the analysis of the impact of the proposed action on the 100-year flood plain does not address the alternative potential impacts of a flood on the pipeline itself. Some assessment of possible damage to the pipeline in that event should be included in the Final EIS as well as discussion of protection measures.

(21) f. In light of the inadequate determination of the existence of wildlife species along the proposed route an advanced reconnaissance should be made prior to beginning any construction, in order to ensure protection of these species.

(22) g. The use of photovoltaic systems for cathodic protection has repeatedly been demonstrated and must be regarded as an available alternative. Though the DEIS does not provide sufficient information on locations of cathodic protection facilities to allow more detailed comment, it is clear that there will probably be new power lines constructed to various sites for cathodic protection. These new power lines may well create a significant visual disturbance as well as requiring

(16) As vegetation near streams and rivers is quick to respond following disturbance (due to its proximity to water) siltation resulting from run-off of staging areas is not expected to be long-lived. The siltation due to this run-off is not expected to substantially increase that from natural rain storms. Special measures such as buffer strips between river and staging areas would be considered for inclusion as stipulations on a case-by-case basis.

(17) A worst case analysis was used to form a reasonable baseline for determining effects. Gate valves would be located on the upstream side of major stream crossings and check valves would be located on the downstream side. The reliability of automatic shut-off valves is questionable; MAPCO engineers have indicated serious problems of unreliability have occurred in the industry with the automatic valves. Because of concrete's porosity, a concrete casement would not prevent leaks and, in fact, would reduce the effectiveness of cathodic protection devices which prevent corrosion-caused ruptures. See the response to letter 12, comment 13.

(18) The general mitigating measures described on DEIS page 1-42 were developed by resource specialists with expertise in wildlife, water quality and vegetation. These general measures, coupled with site-specific measures provided by local resource specialists, should mitigate adverse impacts to riparian habitat on public land.

(19) This is being specifically addressed in the biological assessment being prepared as required by Sec. 7 of the Endangered Species Act. The assessment is available in the background files in the BLM NMSO.

(20) With the exception of the above-ground valves, no surface facilities or any portion of the pipeline would be constructed above ground. The normal minimum depth that the pipeline would be buried is 36 inches in soil and 18 inches in rock. The minimum cover is increased to 48 inches for river and stream crossings, drainage ditches, and at road and railroad crossings. For residential, industrial and commercial areas, normal ditching would be 48 inches in soil and the rock ditch is to have a minimum cover of 30 inches. These depths meet or surpass all DOT requirements, and the likelihood of a 100-year flood having any adverse impacts on the pipeline are remote.

Mr. Arthur W. Zimmerman
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(22) cont. more roads and land disturbance. Use of photovoltaics for cathodic protection--a demonstrated technology--would avoid these impacts and save non-renewable resources. In some cases, it could also be less expensive. This alternative should be thoroughly explored.

(23) h. Most of the region through which the MAPCO pipeline runs is growing rapidly in population. This rapid growth is putting serious strains on electrical generation and transmission capacity in many areas. This results in higher rates for utility customers, potential electrical shortages, and other adverse effects. We find no discussion in the DEIS of the amount of electrical power which will be needed to operate the pipeline. We find no discussion of which utilities will supply that power and the effect that supplying the power will have on power availability and utility rates for other customers. These effects should be discussed in the Final EIS. We believe that examination of these questions will lead BLM to conclude that photovoltaic power for cathodic protection, as discussed in the preceding paragraph, and other means to make maximum use of renewable resources in operation of the pipeline will have many benefits to utility customers, utilities, and the general environment. These issues must be thoroughly discussed in the Final EIS.

(24) i. An analysis of the adequacy of the proposed procedures to protect against ruptures (p. 1-10) should be included in the Final EIS.

j. An analysis of the adequacy of the proposed emergency procedures for dealing with ruptures and/or spills should also be included in the Final EIS (p. 1-28).

(25) k. On page 1-30 the worst case for the reduction of air quality is described. No suggestions are included on how impacts will be mitigated if it should occur. If the potential is identifiable a means of dealing with it must be proposed in the Final EIS.

(26) l. One of the alternatives to the proposed action, truck and railroad transportation, was screened from further consideration as not "reasonable" (p. 1-33). Some explanation should be offered of how this determination was reached.

(27) 2. Site-Specific Comments

a. New Mexico

(1) Immediately south of the Colorado border the proposed route runs through deer range which has already been

(21) See the response to comment 1, letter 38.

(22) The cathodic protection plans call for 1 cathodic device spaced every 10 to 50 miles, depending on soil conditions. These would be spaced so as to coincide with existing power sources. A cathodic protection specialist recently inspected all areas for which a center-line survey has been completed (about 75 percent). Thus far, no cathodic protection component would require more than 1 span (200 feet) of power line. Solar powered would require more maintenance.

(23) The cathodic protectors would require 250 watts at 120 volts (roughly the power required for a large light bulb) and are spaced at 10 to 50 miles (see the response to comment 22 of this letter). Electrical power for the pump station would be used for lighting and communication. The pumps would be fueled by fuel extracted from the pipeline. Accordingly, the electric power required to the pipeline is negligible and insignificant in terms of power demand for any service area.

(24) Guidance and regulations of the DOT and the American Petroleum Institute are met or exceeded by those proposed by the applicant, as described on DEIS pages 1-29 and 1-30. Additional information on maintenance procedures is contained in the response to letter 12, comment 11.

(25) The worst case air quality condition, as described on DEIS page 1-30, would occur under circumstances of a major rupture. Measures to mitigate this potential impact are comprised of many applicant design specification inspection and construction and maintenance procedures to reduce the probability of ruptures. Also see response to letter 12, comment 11. Air quality impacts, under worst case conditions, would be very short term.

(26) At the present time, producers are transporting the NGL by truck to local markets. However, more lucrative markets are in the Midwest and the Texas Gulf Coast. It is uneconomic to transport the NGL that distance by truck. To transport 65,000 BPD would require 273 ten-thousand gallon capacity trucks per day. Safety hazards would increase on the highway from the volume of large trucks required. A pipeline is the most efficient method of transporting these products to market. Refer to responses to letter 28, comments 1 and 2.

(27) Refer to letter 38, comment 14. The specific seed mix being required by the BLM Farmington Resource Area and to be stipulated in any ROW grant for subject area includes antelope bitterbrush to achieve the purpose stated.

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(27) cont. damaged, partially as a result of overgrazing. Revegetation, if properly planned and carried out in this area could be beneficial by returning it to a better state than currently exists there. A plan for revegetation to achieve this goal should be included in the Final EIS.

b. Colorado.

(28) The route through Oro Blanco County appears to cut across two mule deer migration routes (Migration Routes--Colorado Division of Wildlife--1/126720--Wildlife Inventory Maps for Rio Blanco County). These routes are not listed in the DEIS as crucial wildlife use areas wherein construction should be avoided during certain periods. Potential impacts and necessary mitigation measures as a result of these crossings should be thoroughly analyzed in the Final EIS.

c. Utah.

(29) (1) The Dragon Pump Station (MP732) is the only station that will rely on a microwave tower rather than turbine-power (p. 1-22). The DEIS contains no discussion of the reasons this may be necessary or of what special impacts, particularly on bird populations, may be created by the tower. These should be addressed in the Final EIS. If the Douglas Pass alternative is adopted a microwave tower would not be necessary. This should be considered when deciding which route to adopt.

(30) (2) Concerns have been raised regarding the crowded conditions in the Moab Canyon area through which the proposed route runs. The DEIS states that no viable alternatives to this route are available (p. 2-20). The Final EIS should address what alternatives were considered if any, and why they were rejected. It should also discuss whether the creation of a new corridor outside of the Canyon will result in fewer or more detrimental impacts than the Canyon route. Similar issues should also be discussed concerning the Kane Springs are in Utah which is also a very crowded corridor.

d. Wyoming.

(31) (1) One of the most serious concerns raised by the DEIS is the choice among the three alternative routes in Wyoming (the East of Little Mountain route which is the originally proposed route, the Little Mountain alternative and the Pine Mountain alternative). Our position is that the originally proposed route East of Little Mountain is the route which should be adopted. The following issues were reviewed in reaching that position and should be given careful analysis in the Final EIS.

(28) This information has been confirmed. See Text Change section for DEIS Table 1-11, page 1-40.

(29) The microwave tower would enable telephone communication service, and could not be used as an alternate to turbine power. The tower would not result in adverse impacts to bird populations.

(30) A general analysis of topography and land ownership patterns in the Central Eastern Utah area indicated that the only viable North-South corridor crosses through Moab Canyon. The extent of National Park Service lands and the extreme topography led to this decision. The Kane Springs area has similar constraints. More specific discussion of the Moab Canyon area appears in responses to letter 24.

(31) A decision as to the final selection of any alternative is not made during the environmental analysis process. Decisions at this point are made regarding the level of detailed analysis of identified alternatives and a determination of the agencies' preferred alternative. See page xi of the DEIS and the discussion of the preferred alternatives in the summary of this FEIS.

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(32) (a) The existing right-of-way along the three routes: the proposed route (East of Little Mountain) already has at least one existing pipeline running along its length. Although some problems have arisen along this route due to soil slippage it has been suggested that the area of greatest concern could be bypassed by a suspension span of less than 500 yards in length. This is a feasible alternative to following the existing route entirely and avoids the problems with soil slippage. The Pine Mountain alternative route currently contains only a 4-inch above-ground pipeline. The Little Mountain alternative follows the route of a powerline. These two utilities have not resulted in corridors to the extent that the East of Little Mountain pipeline has. It is inconsistent with BLM policy to adopt a route along such insignificant corridors, with the potential of more serious impacts, when a substantial and well-established corridor is available.

(33) (b) Only .1% of the total surface area of Sweetwater County, Wyoming is forested. The majority of this forest area lies on Pine Mountain and Little Mountain. When a viable alternative exists (the East of Little Mountain route) these two forested areas should not be disturbed.

(34) (c) The DEIS categorizes the Pine Mountain alternative as creating a visual impact which could be mitigated by revegetation within three to five years. We do not agree that that is a sufficient time period in which to revegetate a forest area. Recognition, therefore, of a more serious visual impact as a result of adoption of this alternative should be made in the Final EIS.

(35) (d) One of the most serious problems with the two alternative routes is their impact on wildlife. Both routes pass through existing deer, elk, and antelope range. Eighty percent of the tri-state elk herd relies on the range through which the Pine Mountain alternative will pass. Winter range in these areas is extremely critical, and damage to vegetation could destroy that area of the range because of the particular difficulty in reintroducing browse species. The DEIS describes the range on Pine Mountain itself as critical winter range and lists it as to be avoided during the winter months. That area is actually a summer range, however, inaccessible in the winter to the herds as well as to construction crews because of snow depth. By not listing Pine Mountain as a crucial area to be avoided in the summer, interference with the herd by construction is guaranteed. The express wishes of the Wyoming Game & Fish Department to adopt the East of Little Mountain route because of these wildlife impacts should be given a great deal of deference by BLM.

(32) See responses to letter 12, comments 2, 6 and 8.

(33) See response to letter 12, comment 9.

(34) The assessment of recovery of visual resources is based on vegetative rehabilitation to the point that the contrasts are essentially unnoticeable. See the responses to letter 12, comments 24-27.

(35) With respect to the critical elk use on Pine Mountain, refer to letter 12, comments 29 and 30.

Concerns raised by the Wyoming Game and Fish Department will be considered in the decision process.

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(36) (e) Due to the extreme snow depths on Little Mountain and Pine Mountain during the winter months special consideration needs to be given to maintenance problems that may arise. The amount of snow removal required in order to reach the pipe to make repairs may have eventual effects on erosion during spring run-off. Furthermore, the existence of a leak may continue for a longer period of time and be more difficult to detect due to depth of the snow.

(37) (f) There is currently some controversy concerning whether the area through which the Pine Mountain alternative runs should be included in the Red Creek Badlands Wilderness Study Area. Whether it is or not apparently rests on the determination of whether a road exists along the Pine Mountain route. If there is determined to be a road there, the portion of the Wilderness Study Area from the edge of the road and to the west will be dropped from Study Area designation. Whether or not that area is dropped, a pipeline should not be allowed to be constructed on the very edge of a Wilderness Study area. We question whether the road in the area, if indeed it exists, is significant enough to require this area to be dropped from Wilderness Study designation. However, building a pipeline through that area guarantees that it will lose wilderness values. The Final EIS must include a much more extensive analysis of the three route alternatives, particularly in light of the potentially devestating effects on the tri-state elk herd, which are not even addressed within the DEIS.

(38) On the basis of the above considerations we repeat that we suggest adoption of the East of Little Mountain route. It is clearly the preferable route as far as impacts on wildlife and the environment, particularly wilderness values. If the decision in favor of the Pine Mountain alternative is adhered to in the Final EIS it will require a substantial amount of new information to support it.

(39) (2) The proposed action crosses the Green River at Davis Bottom (WL19) creating a new corridor there. No explanation is offered for not following an existing corridor across the Green River a few miles away near the City of Green River. If this crossing remains the chosen route in the Final EIS a thorough explanation for rejecting the existing corridor must be included.

(40) (3) The proposed action also crosses the Green River in Browns Park at mile post 823. That area is a significant recreational area and as recognized in the DEIS (p. 3-11) a route through that area would be plainly visible to users of the River. Special mitigation measures should be employed to avoid visual impacts in this area. There is also extensive

(36) See responses to letter 12, comments 10 and 12.

(37) The Pine Mountain alternative does not infringe on any areas involved in BLM's Wilderness Inventory process. The proposed action (East of Little Mountain alternative) follows a route which crosses an area that has been added to the Red Creek Badlands-Tepee Mountain Wilderness Inventory Unit. See the discussion of preferred alternatives in the summary of this FEIS.

(38) See the discussion of the preferred alternatives in the summary of this FEIS.

(39) The text has been revised to expand the discussion of alternatives through this area. See corrections to pages 1-31 to 1-37 of the DEIS in FEIS Changes to the Text section.

(40) The Green River Crossing at Browns Park would be given special concern in site-specific stipulations attached to a ROW grant. These stipulations would address scenic, recreational and wildlife concerns.

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(40) cont. wildlife habitat in Browns Park which should be considered in the Final EIS.

3. Final Comment

(41) The DEIS was written on the assumption that the applicant will employ methods of construction and operation to reduce the adverse impacts of the proposed action. These methods are discussed in Chapter 1 of the DEIS. Use of these and any other mitigating measures imposed by the BLM must be strictly complied with by the applicant. The right-of-way grant should contain specific and detailed stipulations imposing these requirements, to ensure that the impacts are not allowed to be greater than those determined to be acceptable. Absent these control measures, the analysis contained in the DEIS and in the Final EIS becomes meaningless as a basis of measuring impacts of the proposed action.

Sincerely,

Cass Haug
Legal Intern

dh

(41) The methods and procedures described in Chapter One would be incorporated as conditions to the ROW grant. See response to letter 38, comment 14.

39

Tom Polk
620 Walnut
Rock Springs, Wyoming 82901

June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico, 87501

Dear Sir:

I am shocked at the BLM proposal to run the MAPCO pipeline over a forested mountain in this very sparsely forested county (only 6,000 acres of a total of 6 million acres are forested).

You have available the very reasonable alternative of using the existing utility corridor along highway 430.

I hope you will reconsider you decision.

Yours sincerely,

Tom Polk

Tom Polk

Numerous letters were received from residents of Sweetwater County, Wyoming. They express concern over the selection in the DEIS of Pine Mountain as the agencies' preferred alternative. They also state a preference for a route following Highway 430.

The selection of the Pine Mountain Alternative was based on slight site-specific differences and agency and public preferences known at the time. However, the delay of action alternative has been selected in the FEIS for the tri-state area (MP 800-863) to allow the BLM to continue to analyze both the proposed action and the Pine Mountain Alternative.

A route following Highway 430 was screened from detailed analysis based on specific resource concerns which are summarized in DEIS pages 1-32 and 1-36 and in the response to letter 12, comment 4. See the FEIS summary.

40

Beth Walker
Department of Archaelogy
Western Wyoming College
Rock Springs, Wy 82901

June 13, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

The BLM proposal to route the MAPCO pipeline through the forested mountain area of Sweetwater County, southwestern Wyoming should be considered.

This county has only 6,000 forested acres, out of a total of 6,000,000 acres. Destroying any of this resource is irresponsible.

I hope you will reconsider the alternative of routing the pipeline along the existing utility corridor, Highway 430.

Yours truly,

Beth Walker

Beth Walker

Please see the response to letter 39.

41

Susan Schock
737 1/2 Rugby
Rock Springs, WY 82901

June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I wish to protest the BLM proposal to run the MAPCO pipeline over Pine Mountain in southwestern Wyoming.

The very reasonable alternative of routing this project along highway 430 should be reconsidered. It is in fact the existing utility corridor.

Please reconsider this decision. Our forest resource is important to us.

Sincerely,

Sue Schock

Sue Schock

Please see the response to letter 39.

42

Katharine B. Collins
1906 Opal Street
Rock Springs, WY 82901

June 13, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I am appalled at the BLM's recent decision to run the MAPCO pipeline over a forested mountain in Sweetwater County, Wyoming. In a county which is .001% forested the very idea of disturbing any of this precious resource is unthinkable. But the fact that this is being done in spite of the existence of a reasonable alternative (routing the pipeline up Highway 430)is deplorable.

I hope you will reconsider this decision.

Yours truly,

Katharine B. Collins

Katharine B. Collins

Please see the response to letter 39.

43

6-10-1980

508 Sibley Rex Brewers

Dear Sirs,

I have just read some information regarding the MAPCO pipeline, which is to be built through one of Wyoming's finest mountains. Personally I strongly believe I wonder if any of you people really know what you are talking about. I do not believe you can say honestly that a scar left by a pipe that size of way would be unnoticeable in three to five years.

Why not run the pipeline in Highway 130, a true Wyoming forest land.

I thought BLM had to do with land management, not land misuse. After all, elk can't protect themselves, can you protect them? They need a true forest land, and so do I!

Mary B. Rosenberger

Please see the response to letter 39.

Sirs, 6-9-80

After familiarizing myself with the facts of your Draft proposal of the pipeline route it is beyond my comprehension how your department can even call itself a bureau of land management. The proposal is the furthest thing from land management I've ever seen. Most junior students from this part of the country could tell you its impossible for the land to restore itself in 3-5 years. Each year there are fewer and fewer elk to be seen in this area, the pipeline could be the final straw. Why not start managing the land and send the pipe line up U.S. 130 and leave the mountains to the elk and people who enjoy it.

Sincerely
Randy Dansberger
Randy Dansberger

Please see the response to letter 39.

45

June 9

Dear Sir,

I am writing in regards to the BLM proposal to take the pipeline through our forest. I am totally against this more.

Wouldn't it be adrisable and in better interest to take the line up highway 430.

Thank you,

Pat Pulley
354 H. St.
Rock Springs,
Wyo. 82901

Please see the response to letter 39.

46

DEAR SIR, JUNE 10 1980

I HOPE THE PIPELINE TO BE BUILT BY MAPCO COMPANY WILL NOT BE ROUTED OVER PINE MOUNTAIN. I KNOW THIS AREA WELL, VALUE ITS BEAUTY, AND BELIEVE THAT A PIPELINE HERE WOULD BE DISASTEROUS TO THE DELICATE ECOSYSTEM.

SINCERELY, JIM HUYCK

Please see the response to letter 39.

47

1224 Lincoln Avenue
Rock Springs, Wyoming
June 12, 1980

State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

A recent newspaper article called my attention to the fact that a new pipeline is being proposed in Sweetwater County, Wyoming. This did not surprise me until I noted that this pipeline, the WAPCO, may be routed over Pine Mountain in the southern part of the county.

My family built a summer cabin on Pine Mountain many years ago, and we all have countless very happy memories of this fine area, as have so many residents of this part of the state. We have very little forested land in Sweetwater County, and this proposal calls for carving a new utility right-of-way right through this land.

Since there are already existing right-of-ways in the area which could be utilized without disturbing the wildlife, forests or watershed of Pine Mountain, the routing of this pipeline through this area seems unnecessary. Although all of us realize the necessity for the pipeline, we urge that an alternative, such as following the existing right-of-way up Trail Canyon along Highway 430, be very seriously considered.

Sincerely,

Olive Ann Freeman

Olive Ann Freeman

Please see the response to letter 39.

48

Dr. John D. Collins
Western Wyoming College
Box 428
Rock Springs, WY 82901

June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I write to protest the recent BLM proposal to route the MAPCO pipeline over a forested mountain in Sweetwater County, Wyoming. The environmental impact statement says that the scars left in the forests would be unnoticeable in three to five years. Anyone familiar with our climate and growing conditions knows this is absurd. The minute proportion of our county which is forested, and which is an elk habitat, deserves protection.

I hope you will reconsider this decision and propose instead the very reasonable alternative of routing the pipeline through the existing utility corridor along Highway 430.

Yours very truly,

John D. Collins, Ph.D.

John D. Collins

Please see the response to letter 39.

49

June 18

BLM State Director,
We Disagree with BLM running a pipeline through our forest. We request the pipeline be run on highway 730.

Barbara Thompson

Please see the response to letter 39.

50

Mary C. LaPointe
350 H. St.
Rock Springs, Wyo.
82901

June 10, 1980

BLM ~~State~~ Director
Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I am a resident of Sweetwater County and cherish the overwhelming land usual beauty of the area. I feel that re-routing the MAPCO pipeline through the Little Mountain area would be a terrible mistake. Why go through a forested area when the pipeline could be routed up Highway 430? Please consider the wildlife and precious eco-system and take the line up Highway 430. Thank you.

Sincerely,
Mary C. LaPointe
Daniel W. LaPointe

Please see the response to letter 39.

51

2130 Colorado Dr
Green River, Wy. 82935
June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Gentlemen,

I totally disagree with the BLM proposal to route the pipeline through our forest. I feel that it would be to our benefit if the pipeline could be rerouted to line up with Highway 430.

Yours truly,
Cheryl D. Sturma

Please see the response to letter 39.

52

Dear BLM State Director:

I don't agree with the BLM proposal to take the pipeline through our forests and request that they take the line up highway 430.

Sincerely,

Marbeth Hanson
432 Walnut #2
Rock Springs, Wyo.

Please see the response to letter 39.

53

C.-1. STATE DIRECTOR
P.O. BOX 1449
SANTA FE, NEW MEXICO 87501

Dear Sir,
As a tax payer, an employer of Pine Mtn, and a resident of Wyo, I want to express my disagreement with the BLM proposal to take the pipeline through our forest. I request, instead, that they take the line up Hwy 430.

Sincerely,
Gordon Grant
SR 50 Hutton Heights
Green River, Wy

Please see the response to letter 39.

BLM State Director

I am writing in regard to the proposed MAPCO pipeline to go in thru our forest south of Rock Springs. I'm asking you to please consider another route so as not to disturb our wild life and our forest.

Being born & raised in Rock Springs I have very deep personal feelings toward both Elk Mountain and Little Mountain. These areas have not been touched by people or progress. They are the and deer heards that are impossible to replace.

Please take my request into consideration when making your final decision.

Thank you,

Mr. & Mrs. Jerry Guill
437 M St.
Rock Springs, Wyo.
82901

382-5202

Please see the response to letter 39.

55

Dale and Debbie Houghtaling
P.O. Box 990
Green River, Wyoming
82935
875-6797
June 10, 1980

BLM State Director
P.W. Box 1449
Santa Fe, N.M.
87501

Dear Director ~

This letter is in regard to the proposed MAPCO pipeline. I strongly disagree with the planned route through our forest, and request that you consider instead the line up Highway 430.

Sincerely,
Dale & Debbie Houghtaling

Please see the response to letter 39.

56

BLM STATE DIRECTOR, June 10
we DISAGREE WITH BLM RUNNING
A PIPELINE THROUGH OUR FOREST WE REQUEST
THE PIPELINE BE RUN OR HIGHWAY 430.
Gwen Roach
Mike Roach

Please see the response to letter 39.

57

932 Jefferson
Rock Springs, Wyo
82901

June 12, 1980

Gentlemen: Re: MoPCO pipeline

As members of Sweetwater County we object to your proposal that the pipeline go through the forest rather than routing it up Highway 430. Lets use existing right of ways that have already been built and taken their toll of existing terrain.

Dominick &
Lucille Sharpe

Please see the response to letter 39.

Dear Sir:

I am writing in concern to the proposed MAPP pipeline at Pine Mountain in Sweetwater County Wyoming.

Pine Mountain is one of only three forested areas in Sweetwater county and is refuge to a small but I think growing elk herd. Not to mention the deer, antelope and game birds that also find refuge there. In light of the fact that there is more than a million acres of land to choose from to run the pipeline through alternative routes would be also the cheaper route. There is an existing pipeline on Interstate highway #80 that bypasses pine mountain far enough that interference to wildlife would be minimal.

My family & I come with numerous times from the plains to use area for recreation, such as camping and hiking. I'm sure you understand that a walk through a forest that has been torn all to hell leaves something to said for mankind and his mismanagement of this country.

Thank you

Scott Ward

Please see the response to letter 39.

Paula Thomson
432 Walnut # 1
Rock Springs, WY. 82901

BLM State Director
Box 1449
Santa Fe, New Mexico 87501

Dear Sir,

I am writing in regards to the proposed routing of the MAPCO pipeline. I have lived in Sweetwater County for 20 yrs, and was shocked to find out where the pipeline is supposedly going through. Forests around our desert land are few; far between, Pine Mountain is probably the closest. My friends, family; alot of people I talk to, go to the country for alot of different things: firewood, hunting, Christmas trees (with permits) picnics, arrowhead; rock hunting or just for Sunday Drives. There are many places to go to, so Please reconsider and take into

Please see the response to letter 39.

consideration the logical alternative, and put the MAPCC pipline right up Highway 430, where in the winter months it would be easy to get to.

Thank you,
Paulette Kenyon.

515 Ludvig
Rock Springs, Wyo 82901
June 11, 1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodard

After reviewing your proposals for possible routes for the mapco pipeline over the Browns Park area and over either Doe Mountain or Little Mountain I must ask you one thing; Are You Crazy? You are attempting to disturb the only two forested areas in Sweetwater County, which consists of a vast desert area. The only two elk herds, that are not associated with a proper mountain range are in the Doe Mountain and Little Mountain areas. I was born and raised in South Western Wyoming & have hunted all types of wildlife in both areas. I can tell you now that if any more influence by man, in the way of construction, in that area will drive away existing

Please see the response to letter 39.

herds of animals. I have seen what pipelines do to the country in this area and know that there is no way for the land to cover a 50' scar in 3-5 years. I am hopefully that you will consider what all Wyoming residents feel when they see their favorite areas fall to the blade of a D9. Please I beg, if I must, place your pipeline along established, better ground along U.S. 430. You hold our recreational and wildlife future in your hands. Please... make the right choice. The 430 choice.

Sincerely,

Jack C. Hansen

61

BLM State Director
Albuquerque - BLM
June 10, 1980

Dear Sir,

I am deeply concerned with the BLM's proposed gasline pathway over Pine Mountain. I see such a move as a severe loss of an already small resource in this area. It will adversely interfere with wildlife and soil supportive systems presently operating in that environment. The BLM's proposal is an environmental act. Any agency governing our resources should be ashamed of. Especially when a sound alternative exists. I urge you to reject the Pine Mountain proposal and look at that alternative. Through existing roads in Irish Canyon, Colorado, thence up I-25. Keep the utility corridors in existing corridors. Don't rob us of our limited resources.

Sincerely,
Patricia Ann Walker

Please see the response to letter 39.

OFFICE OF THE GOVERNOR

WILLIAM P. CLEMENTS, JR.
GOVERNOR

June 10, 1980

United State Department of Interior
Bureau of Land Management
New Mexico State Office
P. O. Box 1449
Sente Fe, New Mexico 87501

Deer Sire:

The Draft Environmeotal Impact Statement entitled MAFCO's Rocky Hountein Liquid Hydrocerbone Pipeline, prepared by the BLM New Mexico Stete Office, hes reviewed by the Budget and Planning Office and interested etate egencies. Copies of the review comments are enclosed for your information end use. The State Environmental Impact Statement Identifier Number aesigned to the project is 0-05-50-014.

The Budget end Planning Office appreciates the opportunity to review thie project. If we cen be of any further aesistance duriog the environmentel review process, please do not hesitate to call.

Sincerely,

for Donald E. Marley, Manager
General Government Section
Budget and Plenning Office

ept

Enclosures: Comments by State Department of Highways and Public Transportation
Texas Depertmeot of Water Reeources
Texas Parks and Wildlife Department

EXECUTIVE OFFICE BUILDING # 411 WEST 13TH STREET # AUSTIN, TEXAS 78701

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD
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Executive Director

TEXAS WATER COMMISSION
Lee M. McKinnally
Dorsey B. Hardeman
Joe R. Carroll

June 2, 1980

Mr. Paul T. Wrotenbery, Director
Governor's Budget & Planning Office
Executive Office Building
411 West 13th Street
Austin, Texas 78701

Re: U.S. Department of the Interior, Bureau of Land Management (USDI-BLM)--Draft Environmental Impact Statement (DEIS), Volume One: "MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline," April 1980. (State Reference: EIS 0-05-50-014.)

Dear Mr. Wrotenbery:

In response to your May 13 memorandum, the Texas Department of Water Resources (TDWR) has reviewed the referenced DEIS prepared by the New Mexico State Office of the USDI-BLM, in connection with MAPCO Inc.'s (formerly Mid-America Pipeline Company) Application Number NM 36230 (April 18, 1979) for a public land right-of-way grant under Section 28 of the Mineral Leasing Act of 1920, as amended, and 43 CFR 2880 (Oil and Gas Pipelines), in order to construct 1,172 miles of common carrier pressurized liquid hydrocarbons pipeline, and related facilities extending from MAPCO Inc.'s existing Hobbs Station in Gaines County, Texas, through New Mexico, Colorado, and Utah to the Rock Springs, Wyoming area. The proposed pipeline would connect various gas processing plants in New Mexico, Colorado, Utah, and Wyoming to the distribution system terminal at Hobbs Station. From Hobbs Station the liquids can be transported either through MAPCO's pipeline system to the upper midwest area of the United States, or to existing pipeline connections in the Gulf Coast region. MAPCO plans to collect and transport through a system of gathering lines and the main pipeline, up to 65,000 barrels per day of mixed-stream liquid hydrocarbons (i.e., butane, ethane, iso-butane, natural gasoline, and propane). The life of the project is 30 years.

TDWR concurs in the general findings of the DEIS that the potential adverse environmental impacts or risks of constructing, operating, and maintaining the proposed pipeline project and the related system on the State of Texas would be insignificant, and that the anticipated economic benefits would greatly outweigh any hypothetical adverse environmental impacts or risks (Reference: pages 1-29, 1-30). The foregoing evaluation stems from the following basic reasons:

1. Texas has no further permitting requirements or involvements in connection with the proposed project (Reference: page 1-3).

P.O. Box 13087 • Capitol Station • Austin, Texas 78711 • Area Code 512 475-3187

Mr. Paul T. Wrotenbery
June 3, 1980
Page 2

2. Only 8.7 miles of pipeline, involving 52 acres of private lands in Texas are involved. No federal or state-owned lands are effected in Texas (Reference: Table 1-2, page 1-8).

3. Adequate assurances are furnished in the DEIS that the proposed project will be designed, constructed, operated, monitored, and maintained in accordance with applicable federal regulations, 43 CFR 2880 (Oil and Gas Pipelines) and 49 CFR 195 (Transportation of Liquids by Pipeline), and the comprehensive anti-pollution statutes, the Clean Air Act, as amended (42 USC 1857) and the Clean Water Act, as amended (33 USC 1321). (References: pages 1-10, 1-15 to 1-24, 1-28 to 1-30).

4. The criteria used to determine significant environmental impacts appear to be reasonable and conservative. Adequate assurances are furnished that special construction and resource protection practices will be implemented by the applicant to help minimize any anticipated significant impacts on the environment and resources (including water and related land resources) within the zone of influence of the proposed project. (Reference: Chapter 3, pages 3-1 to 3-25).

TDWR appreciated the opportunity of reviewing the referenced DEIS. The DEIS appears to adequately fulfill the essential administrative, coordinative, and analytical requirements of Section 102(2)(C) of the National Environmental Policy Act of 1969. Please advise if we can be of further assistance.

Sincerely yours,

Seth Bennett for
Harvey Davis
Executive Director

STATE DEPARTMENT OF HIGHWAYS
AND PUBLIC TRANSPORTATION
AUSTIN, TEXAS 78701

May 19, 1980

IN REPLY REFER TO
FILE NO.

Draft Environmental Statement
MAPCO's Rocky Mountain
Liquid Hydrocarbons Pipeline

Mr. Paul T. Wrotenbery, Director
Governor's Budget and Planning Office
Attention: General Government Section
411 West 13th Street
Austin, Texas 78701

Dear Sir:

Thank you for your memorandum dated May 13, 1980, transmitting the draft environmental statement covering MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline

Since only 8.7 miles of the project is located in Texas and since the project does not cross any road on the State highway system, we do not have any comment to offer regarding the draft environmental statement.

Sincerely yours,

B. L. DeBerry
Engineer-Director

By: Marcus L. Yancey Jr.
Marcus L. Yancey Jr.
Asst. Engineer-Director

Suggested Questions to be Considered by Reviewing Agencies:

1. Does the proposed project impact upon and is it consistent with the plans, programs and statutory responsibilities of your agency?

2. What additional specific effects should be assessed?

3. What additional alternatives should be considered?

4. What better or more appropriate measures and standards should be used to evaluate environmental effects?

5. What additional control measures should be applied to reduce adverse environmental effects or to avoid or minimize the irreversible or irretrievable commitment of resources?

6. How serious would the environmental damage from this project be, using the best alternative and control measures?

7. What specific issues require further discussion or resolution?

8. Does your agency concur with the implementation of this project?

As a part of the environmental impact statement review process, the Budget and Planning Office forwards to the originating agency all substantive comments which are formally submitted. If, after analyzing this document, you conclude that substantive comments are unnecessary, you may wish to so indicate by checking the box below and forwarding the form to this office. This type of response will indicate receipt of this document by your agency and that no formal response will be prepared.

☒ No Comment.

M. L. Jordan Jr., Asst. Dir.
Name and Title of Reviewing Official

Safety and Engineering
Div. Railroad Div.
Agency

Railroad Commission

Only 10 miles in Texas - rural

Suggested Questions to be Considered by Reviewing Agencies:

1. Does the proposed project impact upon and is it consistent with the plans, programs and statutory responsibilities of your agency?

2. What additional specific effects should be assessed?

3. What additional alternatives should be considered?

4. What better or more appropriate measures and standards should be used to evaluate environmental effects?

5. What additional control measures should be applied to reduce adverse environmental effects or to avoid or minimize the irreversible or irretrievable commitment of resources?

6. How serious would the environmental damage from this project be, using the best alternative and control measures?

7. What specific issues require further discussion or resolution?

8. Does your agency concur with the implementation of this project?

As a part of the environmental impact statement review process, the Budget and Planning Office forwards to the originating agency all substantive comments which are formally submitted. If, after analyzing this document, you conclude that substantive comments are unnecessary, you may wish to so indicate by checking the box below and forwarding the form to this office. This type of response will indicate receipt of this document by your agency and that no formal response will be prepared.

☒ No Comment.

Paul R. Kramer Director
Name and Title of Reviewing Official

Tyler Fire Service
Agency

62e

TEXAS
PARKS AND WILDLIFE DEPARTMENT

CHARLES D. TRAVIS
EXECUTIVE DIRECTOR

4200 South Lamar Road
Austin, Texas 78744

RECEIVED
JUN 6 1980
Budget/Planning

June 5, 1980

Mr. Paul T. Wrotenbery, Director
Governor's Budget and Planning Office
Attention: General Government Section
411 West 13th Street
Austin, Texas 78701

Re: MAPCO's Rocky Mountain Liquid
Hydrocarbon Pipeline (EIS No. 0-05-50-014)

Dear Mr. Wrotenbery:

This agency has reviewed the above-referenced project and has no comment to offer.

I appreciate the opportunity to review and comment on this project.

Sincerely,

Charles D. Travis

CHARLES D. TRAVIS
Executive Director

CDT:RWS:dab

6-11 80 63

TO: STATE DIRECTOR, NEW MEXICO BLM
SUBJECT: MAPCO PIPELINE

DEAR SIR,

(1) SWEETWATER CO. WYOMING HAS AN AREA OF 6.6 million ACRES, MOST OF WHICH MIGHT BE CLASSIFIED AS DESERT. OF THIS TOTAL, LESS THAN 6,000 ACRES, .1% is FORESTED. THE WYOMING BLM HAS PROPOSED RUNNING THE MAPCO PIPELINE THROUGH THE CENTER OF ONE 3,000 ACRE FOREST - PINE MOUNTAIN. I FIND THAT PROPOSAL TO BE ENVIRONMENTALLY INSENSITIVE AND UNACCEPTABLE. I SERIOUSLY URGE YOU TO FIND AN ALTERNATIVE ROUTE, WHICH would HOPEFULLY Follow AN EXISTING HIGHWAY. THIS COUNTRY is GREAT ENOUGH TO AFFORD ENERGY AND A DECENT ENVIRONMENT. PLEASE GIVE THIS MATTER SOME SERIOUS CONSIDERATION.

THANK YOU

Robert Wiza

ROBERT WIZA
443 VALLEY VIEW # 45
ROCK SPRINGS WYO
82901

(1) See the response to letter 12, comment 9.

Defenders OF WILDLIFE

June 12, 1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Sante Fe, New Mexico 87501

COMMENTS OF DEFENDERS OF WILDLIFE ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE PROPOSED MAPCO ROCKY MOUNTAIN LIQUID HYDROCARBONS PIPELINE

In my position as North Central Representative for Defenders Of Wildlife, a major national wildlife conservation organization, I am usually notified by appropriate agencies of impending impacts on wildlife and wildlife habitat in the Rocky Mountain area, and especially when those impacts are going to occur in my back yard.

(1) I was unaware of this proposed action until the eve of the public hearing held at Rock Springs, Wyoming, May 22. Since I wished to comment I began searching for a DEIS. BLM at Rock Springs had one copy (which was being used by BLM). Since MAPCO was in town for the hearing, their representative drove to the BLM office and presented me with my very own copy, which allowed me all of three hours to evaluate this document before the hearing convened.

If this were an isolated incident I would write it off. It is not! I am on the Board Of Directors of Izaak Walton League, Secretary for Seedskadee Audubon Society, Vice President of Sweetwater Wildlife Association, organizations whose members are very concerned about the future of Wyoming's wild places and wildlife. None of these organization received a copy of this DEIS nor were any of them notified this document was available at the BLM office for evaluation. (one copy).

Further, copies of this document were not made available to state and local organizations such as Wyoming Outdoor Council, International Association for the Protection of Mustangs and Burros, the Green River City Council, and and many other groups and agencies. Neither were these people notified this DEIS could be reviewed at the BLM office.

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

(1) See the response to letter 17.

Larry Woodard
Page 2

In accordance with the intent of the National Environmental Policy Act, I question whether the May 22, hearing can be construed as a legal public hearing. Either through gross negligence or deliberate neglect, copies of this DEIS were not made available to the very spectrum of people who were most interested and who would have evaluated and commented on this proposal.

Most speakers at the May 22, hearing, myself included, requested an extension of the June 16, written comment deadline. Defenders Of Wildlife believes the comment period should be extended for 60 days and that copies of the DEIS be made available to interested parties.

Because of your written comment deadline I have hurriedly reviewed the MAPCO DEIS and offer the following comments:

Concerning the proposed routing of MAPCO's pipeline into Wyoming - through a highly erosive area, through part of Sweetwater County's little forest, through critical elk habitat, it appears that Colorado and Utah BLM said "Stick-em-up!" and Wyoming BLM said, "How high?" and then fainted dead-away.

Wyoming BLM's preferred alternative route over Pine Mountain appears to have been a spur-of-the-moment decision based more on void than on facts.

(2) A June 3, special public meeting called by BLM at Rock Springs brought forth an admission that BLM was not even aware Wyoming Game and Fish lists Pine Mountian as "critical elk winter range."

Quite often, two-thirds of the tri-state corner elk herd will winter on Pine Mountain. Destruction of winter browse and it's replacement with grasses (probably crested wheat) would add to wildlife impacts that are already occurring in this area.

(3) Of the more than 6 million acres that comprise Sweetwater County, Wyoming, only one-tenth of one-percent is forested with aspen, fir, and pine. Part of this mini forest is Pine Mountain. We believe the preferred alternative to route MAPCO's pipeline up the steep slope on the western side of this 9,700 foot mountain and through the timber to be a highly irresponsible decision.

Further, creating a right-of-way where there now is none will establish a precedent which will certainly make it easier for BLM to route the second, third, etc., pipeline across this mountain.

(2) Winter range associated with the Pine Mountain alternative was identified in Table 1-11, page 1-40 of the DEIS. These restrictions would be included as stipulations in the ROW grant. In addition, refer to letter 12, comments 29 and 30.

The analytic criteria presented on page 3-3 of the DEIS was applied for this area. Less than 1 percent of the available habitat is expected to be disturbed.

(3) See the response to letter 12, comment 9.

Larry Woodard
Page 3

(4) Page 1-15 addresses a whole spectrum of safeguards that involve landscaping, revegetation, maintenance, construction, and fire plans for forests that are managed by the U.S. Forest Service.

Please explain why BLM forests are not as important and should not be afforded the same considerations as Forest Service lands?

(5) Alternative "10" will also gouge, scar, and alter Jessie Ewing canyon. Since the pipeline requires a fifty-foot right-of-way and since parts of Jessie Ewing measure less than fifty-feet across (and along with a narrow road, also accommodates a stream bed) construction of a pipeline through this canyon would effectively "write-it-off." Further, conclusions that disturbances in this canyon are "short-term" is truly incredible. The scars will remain forever.

(6) If the Jessie Ewing's route is not dropped for a better alternative, then careful consideration should be given to MAPCO's original proposal. I am very familiar with the slide area on the south side of Little Mountain, having spent the better part of a summer pushing dirt with a dozer to help stabilize this area.

The Mountain Fuel pipeline that runs through the slide has been in existence for 30 years, and although it must be periodically reset, they have never suffered a break in that area. Consideration should be given to suspending MAPCP's line across this slide - a span of about 500 yards.

We believe alternative "10" to be completely unacceptable and that there are much better alternatives.

(7) Proper consideration was not given to the Brown's Park, Irish Canyon, highway 430 route. MAPCO's line could cross the Green River at the Brown's Park bridge, above the water, thus sparing the Green River from increased sedimentation. Since the bridge already exists, visual impacts would not be increased. The route could then follow highway 430 through Irish Canyon and either join the route taken by Mountain Fuel's pipeline at milepost 50 or continue north along 430 to the Rock Springs area.

This route would follow an existing pipeline or road, would permit winter access to all of the line (unlike the Pine Mountain route) would not increase sedimentation in the Green River, would not damage Jessie Ewing Canyon, and would comply with BLM's management framework plans that emphasize routing new pipelines along existing routes.

(4) See the response 22 of letter 12. Basically the BLM and FS lands receive the same protection.

(5) See the response to letter 12, comment 28.

(6) See the response to letter 12, comment 2.

(7) See the response to letter 12, comment 4.

Larry Woodard
Page 4

(8) At the June 3, Rock Springs meeting a BLM spokesman stated this alternative would add 32 miles to the pipeline and a MAPCO spokesman (I believe) said this route would cost an additional 4 million dollars. I wish I could keep the change from these overstatements. In actuality, the increased distance would be only 24 miles and if we divide total cost of the pipeline by miles of pipeline to find the per-mile cost, about 1.8 million dollars would build this alternative and spare the canyon and the mountain.

On page 3-20 we learn that delay of this project would cost MAPCO an estimated 60,000 dollars per day. This is the same as saying, since I'm not a millionaire today I am loosing all that interest. This inane conclusion should not be included in the FEIS. Further, this conclusion, along with the undocumented statement that "decreased efficiency of processing plant operation" would be a result of any delays leaves the impression that BLM is intent on ramming this pipeline through as fast as it can and wherever it chooses. We have no quarrel with the need for this pipeline. Our concern lies in the apparent haste to get the pipe in the ground, the exclusion of Wyoming citizens from the evaluation process, and the inadequate study of alternatives.

(9) We believe the method of calculating impacts on habitat and on wildlife in this DEIS is in error. Cumulative impacts should be considered that address the area rather than just the pipeline right-of-way.

Habitat loss and wildlife impacts in southwest Wyoming over the past ten years has been immense. The cause is certainly minerals related, whether direct or indirect.

Using your method of calculating impacts, each new pipeline, each new recreation site or ORV track, drilling pad, road, strip-mine, is responsible for only a small percent of the impact. Therefore, with your system we can totally destroy a habitat and it's wildlife inhabitants and no one is responsible since each impacted only a little.

BLM statisticians must leave the confines of the office, step out into the real world where habitat and wildlife is getting clobbered, and assess impacts as a total and not a part.

(8) After careful rechecking, the route following Highway 430, as it was understood, would add approximately 30 miles. To use an average cost-per-mile figure as a basis for dollar estimates does not account for extra costs associated with blasting, pipe configuration and other preparation costs. MAPCO's estimate of additional cost for this route is 2.6 million dollars.

(9) Refer to letter 38, comment 13.

Cumulative impacts were analyzed for all resources based on the present condition of the existing environment. Past impacts and proposed projects were included as part of the existing environment.

Larry Woodard
Page 5

(10) Discussion of vegetative restoration in this DEIS is inadequate and quite misleading.

Page 1-22 describes areas having severe revegetation problems as being "slick soils, pan spots, rock outcrops, etc." Also we learn, "In some cases original top soils would need to be saved. Further, "..the applicant would monitor the success of erosion control practices and revegetation in accordance with BLM's monitoring plan." Further discussions of reseeding, etc., leave the impression that scars of this pipeline will become invisible in a few years. Perhaps this is true in other states, but not in the high-plateau desert of southwest Wyoming.

I have challenged BLM at several public meetings to conduct a tour and show us one area - just one - that has been successfully revegetated with native plants. No such success story exists in southwest Wyoming.

As to "monitoring," Rock Springs BLM employees can monitor PPL's pipeline route over White Mountain anytime they look out the window. This scar is just as shiny today as when it was inflicted about ten years ago - except the crop of halogeton keeps increasing. Ten years of BLM monitoring hasn't helped this scar one bit.

Until recently, plants and seeds of native vegetation have been in short supply. Today they are available through several companies, such as "Native Plants" in Salt Lake City, Utah. They supply native seedlings or custom-grow seedlings from native plants and grasses such as would occur along the pipeline route.

Would MAPCO agree to try this kind of revegetation and consult with experts in this field? Some extra dollars spent along these lines could help provide a cure for a problem that must be solved.

(11) The statement "..some top soils.." should be changed to "All Wyoming top soils will be salvaged". There isn't much, and without it you cannot even hope to revegetate a right-of-way.

I would appreciate answers to the question in my comments, and to the following:

(12) 1) Was the expertise of Rock Springs BLM technical staff included in preparation of alternative routes that affect Wyoming public land?

(13) 2) Will you provide me with a copy of their comments?

(10) Revegetation of ROWs is difficult in southwestern Wyoming due to the low annual precipitation in this high-plateau region. MAPCO has agreed to work closely with the BLM to achieve restoration of disturbed areas (DEIS, page 1-22). Species used to revegetate would be based on local area BLM requirements. Where appropriate BLM and FS would require the use of native species of shrubs and grasses, when available.

(11) The DEIS (page 1-22) states that: "... In some cases, original top soil would need to be saved and replaced.... The applicant is willing to do whatever would be necessary with regard to the foregoing...." Where top soil salvage is required by the BLM on public lands in Wyoming, this requirement would be part of the stipulations attached to the ROW grant.

(12) See the response to letter 12.

(13) See the response to letter 12.

Larry Woodard
Page 6

(14) 3) Could Larry Woodard or Bob Armstrong find the time to walk or horseback with me (and others) over the "preferred" Pine Mountain alternative?

(15) 4) If the final MAPCO route has not yet been determined, why is an archaeological survey taking place along the "preferred" route over Pine Mountain?

(16) 5) Exactly why were copies of this DEIS not supplied to many persons on the list mailed from the Wyoming, BLM State Office to the New Mexico, BLM Planning Office?

(17) 6) At the June 3, Rock Springs BLM public meeting, a BLM representative from Utah stated "they did not know if there was room in the existing pipeline corridor through Irish Canyon to run another pipeline". Please explain how you can select or rule out corridors when you don't even know what is buried in those corridors.

I reiterate, we are not opposed to construction of this pipeline. We are pleased to be allowed to comment, even though our comments were uninvited. We are concerned that conclusions reached in this DEIS concerning proposed routing are erroneous and that further study should be given to more environmentally acceptable alternatives.

Thank you.

Sincerely,

Dick Randall
North Central representative
Defenders Of Wildlife
Box 507
Rock Springs, Wyoming 82901

(14) BLM Rock Springs District personnel and NBEI team members have been on-the-ground in this location.

(15) See the response to letter 12.

(16) See the response to letter 17.

(17) A route through Irish Canyon (a route following Highway 430) was screened from detailed analysis for several reasons, as discussed in the response to letter 12, comment 4.

June Eleventh

Mr Larry Worthard
State Director
BLM - New Mexico

Dear Mr Worthard

I would formally like to request an extension of the comment period on the MOPCO DEIS.

The informational hearing held June third 1980 has convinced me that the intent of FLPMA and NEPA laws has not been fulfilled with regards to construction comments by an informed population in a reasonable period of time. During the first public meeting May 19, the most common concern of all was the lack of statements and the lack of review time. Draft EIS statements were still being passed out on June third just thirteen days before comments are due.

Mr. Carl Hensleson of Green River stated in his comments that he had to drive to Vernal for a copy because one was

Refer to the response to letter 17.

not available locally.

We simply need more time.

Thank you

Peggy S. Thorpe

1241 Parkway Ave

Rock Springs, Wy 82901

1804 Elk #37
Rock Springs, WY 82901
June 11, 1980

BLM State Director
P. O. Box 1449
Santa Fe, New Mexico 87501

Sir:

(1) It has come to my attention that the local BLM office in Sweetwater County has recommended that the proposed Alaskan sized MAPCO pipeline be rerouted out of an existing utility corridor and out through one of our forested mountains. It is my understanding that there are other feasible alternatives that would serve the same purpose, for instance taking the line up Highway 430, and yet preserve a bit of our valuable forest land.

(2) For us people who live in "desert places", the trees and forests of Wyoming hold even greater value. The contention is that in three to five years the path along the pipeline would be visually destroyed, but anyone who travels through our few mountain forest areas can see the paths travelling up the sides of the mountains, paths cut many years before for other pipelines or utility servicing. This says nothing about the interference of habitat for our wildlife and game, one of Wyoming's chief distinguishing characteristics from other states.

I am sure, with all of the activities of the governments in this nation, that ways can be found to take the route another direction, again I would advocate up Highway 430, without costing anyone much more or any more expense.

Thank you for the opportunity to express myself in this matter.

Sincerely,

Mrs. Ellen Gilbreth

(1) See the response to letter 39.

(2) Many of the "paths" which are still evident result from construction completed prior to the time when revegetation and rehabilitation were required by law. See response to letter 64, comment 10.

June 8, 1980

Dear Sir,

I am writing in regards to the Mapco pipeline proposal, specifically the Pine Mtn. alternative. I am appalled at the decision making process that the BLM has exemplified in this issue. I have found the EIS totally unacceptable — the alternatives proposed were too sketchy, inaccurate, impossible to determine route specifics. I found the reasoning for the alternatives weak, illogical and in places, just plain false.

(1) It is obvious to me that the BLM offices of the areas through which the pipeline passes did not work together on this proposal, an association I would of thought imperative on such an important decision making process as this.

I urge you to step back and reconsider all alternatives. Let's find an alternative based on sound reasoning and facts. Thank you

Sincerely,

Steven Greb
511 "C" St Rock Springs, Wyo.

(1) See the response to letter 39.

Department of Local Affairs
Colorado Division of Planning

Philip H. Schmuck, Director

Richard D. Lamm, Governor

MEMORANDUM

TO: BUREAU OF LAND MANAGEMENT
Attn: Arthur W. Zimmerman

FROM: Stephen O. Ellis
State Clearinghouse

SUBJECT: ADDITIONAL COMMENTS
MAPCO Liquid Hydrocarbon Pipeline
Draft Environmental Impact Statement

DATE: June 10, 1980

The enclosed comments on the above-referenced proposal have just been received from the following:

Department of Health

Please consider this transmittal as an official addition to the comments which I sent to you earlier. We regret this late transmittal, and hope that these comments can still be given consideration.

Thank you for your attention.

SE/MK/vt
Enclosure

cc: Office of the Governor
Department of Natural Resources
Department of Health

520 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80203 (303) 892-2351

COLORADO DEPARTMENT OF HEALTH

4210 EAST 11TH AVENUE · DENVER, COLORADO 80220 · PHONE 320-8333
Frank Traylor, M.D., Executive Director

DATE: June 3, 1980

SUBJECT: NON-STATE ASSISTANCE

REVIEW AND COMMENTS

TO: Stephen O.Ellis
Division of Planning

PROJECT TITLE: MAPCO Liquid Hydrocarbon Pipeline, Minor Action #79-139

STATE IDENTIFIER:

(1) COMMENTS: (Due May 30, 1980) Radiation & Hazardous Wastes: All solid wastes from construction and/or occupancy phases shall be disposed of in legally designated solid waste disposal sites.

(2) Noise Control: We would stress the adherance of the maximum permissable land use noise levels as stated in CRS, 1979 amended, 25-12-101 and 103. Construction noise levels are known to be of a level to possibly impair the workers hearing; therefore, we strongly suggest providing hearing (ear) protection devices to the employees when the noise levels exceed 90dB(a). OSHA enforces occupational exposure noise levels. If the contractor/employer recognizes the health effects caused by excessive noise levels and protects the workers, he/she will also protect the community.

JUN 09 1980
DIV. OF PLANNING

Name/ Title
Steve Kelsey
Environmental Planning Coordinator

SOC-3, Jan 79

(1) This comment will be forwarded to the applicant. MAPCO does not intend to generate any hazardous wastes during construction and would dispose of other solid wastes in compliance with applicable regulations.

(2) MAPCO engineers agree with this point of view and plan to follow OSHA guidelines in respect to noise. MAPCO plans to comply with all federal and state laws during and after construction, including OSHA regulations.

STATE OF COLORADO
Richard D. Lamm, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
Jack E. Grieb, Director
6060 Broadway
Denver, Colorado 80216 (825-1192)

June 13, 1980

TO : Steve Norris
Colorado State Clearinghouse

FROM: C. J. Grand Pre
Senior Wildlife Biologist

SUBJ: MAPCO Pipeline - BLM

We have examined the above-cited proposal and find it difficult to evaluate. The text and maps lack the detail necessary for an intelligent and comprehensive review.

(1) The wildlife information presented is essentially correct. However, certain important wildlife habitats and related mitigation procedures have been overlooked. For example - in Section 480 important deer and elk crossings near Highway 160 are transected. Construction should be limited to the months of June through September. In Section 460, the Bodo Wildlife Area has wildlife development projects in progress. Pipeline construction should be coordinated with the Division of Wildlife through this area. Section 483 to 500 is critical deer and elk winter range. Section 515 to 535 in the Sandstone and Cross Canyon areas support deer and elk migration routes. No construction should be conducted from October 1 through April 30, 1981, in these areas.

(2) We also have some concern about reclamation of the pipeline corridor. All reclamation must be immediate and complete. Monitoring of all reclamation activities must be conducted to assure success. This is particularly important in riparian situations and on big game winter ranges.

(3) In addition we feel that access along the pipeline be tightly controlled. Also, the installation of pressure sensitive valves near all water courses is recommended.

(4) We urge the BLM to contact this office for further discussion of pipeline alignments and mitigation procedures.

/d
cc: NW Region
SW Region
BLM (New Mexico)
File (2): Pipelines NW/SW

(1) With respect to the Bodo Wildlife Area, it has been suggested to MAPCO that they coordinate their construction activities in this area with the Colorado Division of Wildlife. In addition, see the response to letter 19, comment 1.

The information concerning winter range and migration routes has been confirmed. The appropriate district offices of the BLM and FS have been contacted to explore what appropriate ROW grant stipulations should be required to reduce the real potential of adverse impacts to wildlife should construction be scheduled for these times.

(2) A thorough and prolonged monitoring program would be in force during construction, operation and maintenance of the proposed project (see DEIS, page 1-28).

(3) Access would be limited by vehicle barriers at locations where they are considered necessary by the surface management agency or private land owner. Pressure-sensitive valves or automatic shut-off valves have been discussed in the response to letter 38, comment 17.

(4) The Division of Wildlife has been contacted during the data collection process and the information provided to BLM NMSO has been considered throughout the EIS preparation process. The BLM does not have the authority to stipulate specific mitigation procedures on lands other than those administered by the BLM.

IN REPLY REFER TO:

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

POST OFFICE BOX 1306
ALBUQUERQUE, NEW MEXICO 87103

June 16, 1980

Memorandum

To: State Director (922), Bureau of Land Management, Santa Fe, New Mexico

From: Acting Deputy Regional Director (OE)

Subject: Review of Draft Environmental Impact Statement for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline (EC-80/18 BLM)

This memorandum responds to your request, received May 6, 1980, to comment on the draft environmental impact statement for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline. The following comments represent the views of Regions 2 and 6 of the Fish and Wildlife Service.

GENERAL COMMENTS

(1) The pipeline would cross segments of the Green and Colorado Rivers which are known to be important habitat for the endangered Colorado squawfish. These crossings would occur on the Green River above Jensen, Utah, and the Colorado River near Moab, Utah.

The Green River at the Browns Park, Utah crossing, though probably not occupied by squawfish at present, is historic squawfish habitat. The species disappeared from this segment after construction of Flaming Gorge Dam and Reservoir changed the temperature, turbidity and flow regime of the river. Recent penstock modifications at Flaming Gorge Dam have warmed the tailwaters and some warmwater fishes are beginning to reappear in the Browns Park area. Regardless of whether or not the squawfish can be restored to this portion of the Green River, the crossing is about 60 miles upstream from a segment that is known to be important squawfish habitat. The Browns Park segment of the Green River also is important sport fish habitat.

Squawfish have been found in the White River both above and below the pipeline crossing near Bonanza, Utah. Also, the confluence of the Green and White Rivers is important squawfish habitat.

(1) This information will be incorporated into the biological assessment to the be submitted to the Fish and Wildlife Service as part of the formal consultation process.

(2) Stream crossings could pose a potential hazard to game fish habitat.

(3) Throughout the corridor traversed by the pipeline, riparian and canyon-bottom vegetation is a unique, highly productive habitat type that is in critically short supply. Therefore, as a general rule, these areas should be avoided where possible. At stream crossings, disturbance of riparian habitat should be kept to a minimum.

(4) It is important that close coordination be maintained with respective State fish and game agencies as specific rights-of-way permits are granted and construction initiated so that site-specific problems of alignment and work scheduling can be avoided.

We concur with the comments in the draft EIS concerning endangered and threatened species. A species list was provided to BLM, Santa Fe, by the Albuquerque Regional Office of the Fish and Wildlife Service by memorandum dated November 16, 1979. It would not be appropriate to comment further on threatened and endangered species until the biological assessment is completed by BLM. At that time, as mentioned in the draft EIS, BLM will request formal Section 7 consultation if it is determined from the assessment that the project may affect any threatened or endangered species.

SPECIFIC COMMENTS

(5) Page 1-30, Paragraph 1 - The report states if vegetation is damaged during a spill, the ground would be reseeded as required by the surface owner. To insure that reseeding is performed, MAPCO should be required to perform reseeding or, at a minimum, should compensate the surface owner for reseeding costs. Damaged areas should be reseeded with vegetation beneficial to wildlife.

(6) Page 1-30, Paragraph 4 - The statement addresses the measures to be taken in the event of pipeline leakage at a stream crossing. Due to possible severe adverse impacts to fish and wildlife with a break in the pipeline at a stream crossing, MAPCO should develop a detailed plan to prevent leakage and a contingency plan in the event of a break. Special consideration should be given to install valves at stream crossings which will automatically stop the flow in the pipeline should a break occur. It is imperative that leaks be stopped immediately to minimize environmental damage.

(7) Page 1-30, Paragraph 7 - Eighteen potential alternatives were identified in the statement. We recommend that an alternative be explored to avoid the segment of the Green River proposed for inclusion into the Wild and Scenic River system.

(8) Page 1-42, Paragraph 4 - Vehicle barriers are not always effective,

(2) Refer to letter 70, comment 11 and letter 38, comment 18.

(3) See the response to letter 70, comment 11.

(4) See to response to letter 69, comment 4. The suggestion is appropriate and has been noted.

(5) The statement on the DEIS, page 1-30 meant that MAPCO would have responsibility for restoring damaged areas by means including reseeding.

(6) This comment was addressed in part in the response to letter 12, comment 13 and letter 38, comment 17. The response to letter 38 indicated that the reliability of automatic valves is suspect. MAPCO's Operation Plan will incorporate safety features.

(7) The presence of the segment of the Green River proposed for inclsion in the Wild and Scenic River System was one of many factors weighed in the screening and selection of alternatives. Of the identified alternatives which did not cross the Green River, none was found to be environmentally better than those which did.

(8) This comment will be considered in the preparation of any site specific stipulations relating to vehicle barriers.

(8) cont. especially where two-wheel ORV's are involved. If vehicle barriers are required, they should be of a type which will prevent four-wheel and two-wheel ORV's from entering the ROW.

(9) Page 3-3, Paragraph 10 - Presence of habitat for endangered fishes should also be a factor in determining the significance of impacts of ruptures and spills.

(10) Page 3-8, Paragraph 2 - According to the statement, fuels and lubrication oils from construction staging areas may enter streams via runoff. Fish and wildlife could be affected by these effluents, thus, measures to prevent this impact should be addressed.

(11) Page 3-8, Paragraph 3 - The potential for significant impact to fisheries if riparian vegetation does not become reestablished in one year is mentioned. MAPCO should present a plan which will prevent adverse impacts or mitigate impacts on fish if revegetation is unsuccessful.

(12) Page 3-8, Paragraph 4 - The draft statement mentions that increased human access could affect winter habitat in the Rye-Grass Draw area. The wildlife species affected should be identified along with a plan to prevent disturbance or mitigate adverse impacts.

SUMMARY COMMENTS

If the comments contained in this memorandum are adequately addressed, we believe the final statement will adequately describe the existing resources of the project area and the expected impacts of the proposed activities.

Thank you for the opportunity to review this document.

Jack P. Worthington

cc:
Regional Director, FWS, Ecological Services, Denver, Colorado
Chief, FWS, Office of Environmental Coordination, Washington, D.C.
Area Manager, FWS, Phoenix, Arizona
Branch Chief, Branch of Pipeline Operations, FWS, Washington, D.C. (ES)

(9) These effects will be addressed in the biological assessment. Refer to letter #38, comment 19.

(10) Specific siting of staging areas for river crossings as well as general and site specific stipulations developed locally would adequately mitigate the potential for pollution from these effluents.

(11) On public lands, specific locations of staging areas would be located to reduce impacts to riparian habitats. Where these impacts cannot be avoided, special-site specific stipulations would be developed and attached to the ROW grant.

(12) The primary species of concern are deer and elk. This potential impact was identified by BLM biologists. The probability of this impact occurring is not known. See the response to letter 13, comment 3.

With respect to the method to develop and require specific mitigation plans, see the response to letter 38, comment 14.

71

Scott M. Matheson
Governor

STATE OF UTAH
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH
150 West North Temple, P.O. Box 2500, Salt Lake City, Utah 84110

533-6108
June 12, 1980

Alvin E. Ricters, Acting Director
Room 426 801-533-6121

James O. Mason, M.D., Dr.P.H.
Executive Director
801-533-6111

DIVISIONS
Community Health Services
Environmental Health
Family Health Services
Health Care Financing
and Standards

OFFICES
Administrative Services
Health Planning and
Policy Development
Medical Examiner
State Health Laboratory

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Re: Comments on MAPCO Pipeline
DEIS

Dear Sir:

(1) Our staff has reviewed the draft EIS on the proposed MAPCO Rocky Mountain Liquid Hydrocarbons Pipeline. Our major concern is with the air quality significant impact screening techniques. The draft EIS states that one of four criteria must be met in order for air quality impacts to be deemed insignificant. This office believes it would be appropriate to insure all four criteria are met before determining that no significant air quality impacts exist.

It is also necessary that the applicant obtain a state construction permit from the Bureau of Air Quality before construction and operation of a new pollution source can begin.

Sincerely,

Brent C. Bradford
Director
Bureau of Air Quality

BCB:js

An Equal Opportunity Employer

(1) The criteria were established to define parameters of significance. Based on the analysis, no significant impacts to air quality are anticipated. The discussion of criteria for air quality impacts (DEIS, page 3-1 and 3-3) meant to convey that the 4 criteria would have to be met at a minimum to be considered not significant.

June 20, 1980

B.L. Director
Bente H. Manuscript

Dear Sirs

Having lived in Wyoming all my life and hunted and fished around Pine Mountain and having been to friends cabin in the mountain and cut Christmas trees over the years we are well acquainted with the area & feel that the mountain should not be disturbed and destroyed if there are alternate routes to be used. Therefore we would like to cast a vote against destroying our country in favor America and against, Wyoming should begin to protect our beauty and natural resources.

Thank you
Mr. & Mrs. Some Rate
Rock Springs, Wyo. 82901
919 C St.

Please see the response to letter 72.

73

Dear BLM State Director,

I don't agree with the BLM proposal to take the pipeline through our forest and reguest that they take the line up highway 430

Cheryl Confer

Please see the response to letter 39.

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

To Whom It May Concern:

I am writing to express my disagreement with the BLM proposal to re-route the Mapco pipeline through only one of two forested mountains in Sublette County.

In my opinion the proposal is absurd considering the unnecessary damage to our forest lands when the pipeline could parallel the already impacted corridor along Highway 430. The extension of 30 miles or so of pipeline is a small price to pay in order to preserve our diminishing wildlife and forests.

Please consider these concerns before making an environmentally unsound decision on this issue. Thank you for your attention and concern.

Sincerely,

Donna Wilson
Boreca Mn. Pk #14
Rock Springs, Wy.
82901

Please see the response to letter 39.

11 June 1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodard

I am writing to express my disapproval of the proposed routing of the MAPCO pipeline through the pine or Little Mountain areas of Sweetwater County. I object to the routing of any pipeline through any forested area of Sweetwater County and propose that it be routed through an existing corridor.

Thank you very much for your consideration.

Sincerely

Gil Marsh
P.O. Box 532
Rock Springs, Wyo.
82901

Please see the response to letter 39.

BOWHUNTERS OF WYOMING, INC.

IF YOU ARE NOT SUPPORTING BOWHUNTING YOU ARE HELPING TO OUTLAW IT!

76

June 13, 1980

BLM State Director
P.O. Box 1449
Sante Fe, New Mexico 87501

Gentlemen:

The very recent proposal of a pipeline from Wyoming to Texas is prompting me to write this letter.

We are all in agreement that the pipeline is a much needed item, but the proposed route will have some very devastating affects on Wyoming and our wildlife. Bow Hunters of Wyoming feel that there is more than one alternate route that can be taken, without destroying forest and wildlife, at a substantial decrease in costs of installation and upkeep. Common sense and judgment makes this very apparent.

(1) A statement has been made that the scars will not be noticeable in five years but this is an untrue statement. Just across the border in Colorado, the scars still remain of seismographic activity after fifteen years.

We believe this has been a hasty proposal, and we are asking you to slow down a bit and weigh all of the facts. An extra measure of caution at this time will surely pay high dividends for the future.

Sincerely

Vaughn E. Cross
President

"REMEMBER: WE NEED YOUR SUPPORT NOW--NOT LATER!"

Please see the response to letter 39.

(1) Many of the scars from seismic lines in the area were created at a time when reclamation of disturbed areas was not required by law. See the response to letter 64, comment 10.

77

Shari Hahn
603 Bridger
Rock Springs WY
6/10/80

Bureau of Land Management
PO Box 1449
Santa Fe, N. M. 87501

Dear BLM State Director

I do not condone the proposal of the BLM in route the MAPCO pipeline through the Jesse Ewing Canyon

However I do feel that a pipeline routed parallel to highway 430 would be preferable to all concerned — hunters, recreationists, conservationists. The MAPCO would also keep the benefits of easy access.

Sincerely

Shari Hal

Please see the response to letter 39.

78

June 12, 1980
909 McKinley
Rock Springs
Wyo. 82901

B.L.M. State Director
Santa Fe N. Mex
87501

Dear Sir

I'm writing in regard to a pipeline to be laid by Mapco through Wyoming.

Why not lay the pipeline in a route already torn up for this purpose? We have a few beautiful areas near Rock Springs, Wyo and you propose a route including Pine Mt, a game, fishing and picnicking area we treasure. Please reconsider.

Thank you
Mrs. John Kowlok

Please see the response to letter 39.

79

June 13

Acting State Director
Bureau of land management

Dear Sir;

I would like to go on record as opposing the BLM alternative of routing the Mapco pipeline over Pine mountain. As our county has only 6000 forested acres, I find it unthinkable that the BLM could propose taking the pipeline out of an existing pipeline right-of-way and putting it through one or the other of our forested areas.

Let's use some common sense and keep the pipeline down by the highway where the company can get to it and maintain it.

Thank you
Gregory T. Toth

1121 10th St.
Rock Springs WY 82901

Please see the response to letter 39.

2500 COLLEGE DRIVE

P. O. BOX 428

80

WESTERN WYOMING COLLEGE

ROCK SPRINGS, WYOMING 82901

June 14, 1980

BLM State Director
P.O. Box 1449
Sante Fe, New Mexico 87501

Dear Sir:

I am writing in regards to the proposed oil or gas pipeline to be built by MAPCO Co. into Southwestern Wyoming from Texas. As I understand things now, the route favored by your office is across the Green River at Browns Park (in N.W. Colo.) through Jesse Ewing Canyon then over the top of Pine Mt. in Southern Wyoming. If this indeed the case, it is beyond comprehension as to why this route was selected. It appears to me that common sense dictates a route along Highway 430 through Irish Canyon. Not only is access already available to a pipeline for year round maintenance, but I believe a pipeline right-away presently exists along this route. To consider destroying a section of what little pristine forest we have in Sweetwater County seems to me to be no less than a crime.

My family and I have spend many weekends camping on Pine Mountain and we feel a real tragedy may be in the making. We sincerely hope you reconsider this disastrous proposal before we face irreverable consequences.

Sincerely,

James C. Aumiller Ph.D.
Professor of Chemistry

Please see the response to letter 39.

81

June 13, 1980

Mr. Larry Woodward
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodward:

I am writing in opposition to the BLM decision to reroute the MAPCO pipeline over Pine Mountain in southern Sweetwater County. As a resident of Sweetwater County for the past eight years, I am familiar with the routes in question and am seriously concerned about a decision that would allow a pipeline right-of-way through the heart of what little forested land this county possesses. It seems much more sensible to route the pipeline along Highway 430 and I hope you will take another serious look at that alternative.

Thanks for reading this and I hope you will reconsider.

Sincerely,

David Kathka
1245 Palisades Way
Rock Springs, Wy 82901

Please see the response to letter 39.

1224 Lincoln Avenue
Rock Springs, Wyoming 82901
June 11, 1980

State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sirs

We recently discovered that a new pipeline is being proposed in Sweetwater County, Wyoming. This is not particularly alarming, since the county is a center for all types of mineral development. However, this pipeline, the MAPCO pipeline, may be routed over Pine Mountain, in the southern part of the county, and this disturbs us very much.

We urge you to reconsider the routing of this pipeline over Pine Mountain. This would carve a new utility right-of-way over one of the very few forested areas in this part of the state. This seems needless since there are other, existing right-of-ways in the area which would not necessitate disturbing the trees, wildlife or watershed on Pine Mountain. One such alternative which seems viable would be to follow the existing right-of-way up Irish Canyon along Highway 430.

Our family built a cabin on the slopes of Pine Mountain two generations ago, and it was the site of many family gatherings. While no longer in our family, we have hiked and hunted and skied in this area, and recently we were married there. We love this land and hope that its character and beauty may be maintained. While the whole nation is in need of the products which will pass through the proposed MAPCO pipeline, surely this doesn't have to be done at the cost of one of the few forested areas in Sweetwater County.

Thank you.

Sincerely,

Dennis and Beth Hurley-Freeman

Please see the response to letter 39.

83

218 A Street
Rock Springs, Wyoming 82901
June 12, 1980

State Director
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

Just recently I learned that a new pipeline, the MAPCO, is being proposed in Sweetwater County, Wyoming, and that it may be routed over Pine Mountain in the southern part of the county.

Many years ago, my husband and I built a summer home on Pine and our family spent many, many happy summers there. My children and grandchildren have very fond memories of Pine Mountain. We do not have much forested land in Sweetwater County, and I believe that what we have should be preserved.

I understand that there is a very good alternative to this proposed routing of this pipeline. This would take advantage of the existing right-of-way up through Irish Canyon along Highway 430. I am sure that all who have enjoyed the area of Pine Mountain for so many years would greatly appreciate your serious consideration of this alternate route.

Sincerely,

Mrs. John W. Wallace

Mrs. John W. Wallace

Please see the response to letter 39.

84

W. Michael Gear
Department of
Archaeology
Western Wyoming College
Box 428
Rock Springs, WY 82901

June 13, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I sincerely hope you will reconsider the hastily-made decision to route the MAPCO pipeline over one of Sweetwater County, Wyoming's forested mountains.

Public review of this proposal has been insufficient; the impact upon the fragile ecology of this area has been given inadequate attention in the environmental impact statement.

Please reconsider the reasonable alternative of routing the pipeline along Highway 430.

Sincerely,

W. Michael Gear

W. Michael Gear

Please see the response to letter 39.

champlin

John Christopher Cirone
Assistant General Attorney

June 13, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, NM 87501

Re: Mapco, Inc. - Draft Environmental Impact Statement in Rocky Mountain Liquid Hydrocarbons Pipeline

Dear Sir:

Champlin Petroleum Company (Champlin) submits the following comments in support of the construction of the proposed pipeline described in Mapco, Inc.'s (Mapco) Draft Environmental Impact Statement.

1) Champlin will be significantly affected by the findings regarding the pipeline because it has committed the majority of its current and future natural gas liquid production from the Overthrust Area (over 15,000 barrels per day) to be transported by the pipeline.

2) This pipeline is vital to the continued production and development of new sources in the Overthrust Area of Wyoming and Utah. Local markets are inadequate to consume the available natural gas liquids, and thus, transportation of the liquids out of the region to areas where demand is greater is critical to continued production. Alternative methods of transportation are generally not feasible. Rail cars to move the products are in short supply or totally unavailable. Additionally, movement by rail is very expensive - 7¢-15¢ per gallon by rail as compared to 3.5¢ per gallon by pipeline. The cost of rail transportation precludes the incentive necessary to maximize natural gas liquid production, and the investment necessary for construction of new facilities. The distances involved in transportating the liquid products from the Wyoming-Utah area to

Champlin Petroleum Company
P.O. Box 9365
Fort Worth, Texas 76107
817 / 737-1119
TELEX 910 893 5024

viable markets rule out trucking as an alternative means of transportation. The pipeline is the least expensive, most efficient means of transporting the natural gas liquids to the consumers most in need of them.

3) Champlin emphasizes that the timing for completion of the pipeline is urgent. Champlin has an ownership interest in three plants in the pipeline supply area that will begin operations in 1980. These plants should have total recoveries of approximately 5,000 barrels per day (BPD) (Champlin's share is approximately 3,500 BPD). As discussed above, adequate markets for the natural gas liquid products do not exist in the Utah-Wyoming area, and it is imperative that the products should reach a market in need of these resources.

4) The pipeline is the only efficient method of transportation for one of the natural gas liquid products, ethane. It cannot be transported by rail or truck. Projected recovery of ethane by Champlin as a result of the construction of new plants and modernization of existing plants is estimated to be 7,500 BPD. This recovery will only be accomplished if the pipeline is constructed to transport the ethane.

5) Should the pipeline not be built, the significant volume of natural gas liquids would not be extracted but rather would be sold as part of the BTU content of the natural gas stream. This would constitute an extremely inefficient and shortsighted use of domestic natural resources. Such a use would be entirely contrary to the goal of attaining increased energy self-sufficiency in the United States.

To summarize, Champlin fully supports the construction of the proposed pipeline and believes that any environmental consequences resulting from construction are far outweighed by the benefits which will accrue to the nation as a result of the access to increased quantities of the natural gas liquid products which can be produced and distributed only if the pipeline is approved and completed.

Respectfully submitted,

John C. Cirone

John Christopher Cirone

wh

cc: Eugene G. Bell
Mapco, Inc.
1800 So. Baltimore Ave.
Tulsa, OK 74119

86

Superior Wyoming
June 1980

TO: Bureau of Land Management
New Mexico

Dear Sir:

The following people protest the proposal to put the MAPCO pipeline through our only forested mountians in this County. Please put it down through the praire where the construction and maintenance wont drive off the Elk and deer, and we wont lose what little forest we have. The Company want to put it down the valley and we think you should let them. Since it is Wyoming gas and oil, should n't Wyoming make this decision. Please use a little common sense.

Sincerely,

Name	Address
Ann Hazewood	1809 McKinley KS

Please see the response to letter 39.

Superior Wyoming
June 1980

To: Bureau of land management
New Mexico

Dear Sir:

The following people protest the proposal to put the MAPCO pipeline through our only forested mountians in this County. Please put it down through the praire where the construction and mainteranee won't drive off the elk and deer, and we won't lose what little forest we have. The company wants to put it down in the valley and we think you should let them. Since it is Wyoming gas and oil, shouldn't wyoming make this decision. Please use a little common sense.

Sincerely,

Name	address
[illegible]	Box 365 Superior
[illegible]	P.O. Box 67 Superior
[illegible]	1104 Hill Top Rd Superior
[illegible]	Superior Wyo
Frank Trujillo	

Please see the response to letter 39.

Brent Pinnell	#21 Apt Trailer Ct. R.S. Wy
Joyce Zuckey	
Donna McCoy	P.O. Box 67 Superior, Wyo. 82945
Gary Morrison	P.O. Box 71 Superior, Wyo 82945
Peter Eldridge	Box 67 Rock Springs Superior Jct. Wyo
Karen M. Stump	Superior Wyo. 82945
Guy Koop	P.O.B. 462 Superior Wy 82945
Sharon Koop	P.O. Box 462 Superior Wyo 82945
Jerome Larsen	P.O Box 425 Superior, Wyo
Gayle Larsen	P.O Box 425 - Superior, Wyo
John Smith	Box 322 Superior, Wy.
Gloria Tabet	Box 313 Superior Wyo.
[illegible]	Box 451 Superior Wyo
D. Ryder	Superior Wyo.
Matt Mathews	Box 322 Superior, Wyo.
Dennis Mathews	Cameron Box 302 Superior Wyo.
Ronny Robinson	P.O. Box 105 Point of Rocks, Wyo. 82942
Wes Hoffman	P.O. Box 105 Point of Rocks, Wyo. 82942
C.D. Hafen	404F St Rock Springs Wyo.
Linda Hafen	404F St " " " "
Gary Hall	119 Uinta Rock Springs Wyo.
[illegible]	
Marie Uhls	Superior, Wyo.
Dorothy McCormick	R.S.
Bill Britton	R.S. Wyo.
Byron Savage	416 Grant Rock Springs Wyo.
Linda Savage	" " "

Superior Wyoming
June, 1980

To: Bureau of Land Management
New Mexico

Dear Sir:

The following people protest the proposal to put the MBPCO pipeline through our only forested mountains in this county. Please put it down through the praire where the contruction and maintenance won't drive off the elk and deer, and we won't lose what little forest we have. The company wants to put it down in the valley and we think you should let them. Since it is Wyoming gas and oil, shouldn't Wyoming make this decision. Please, use alittle common sense.

Sincerely

Name	Address
Bernard Woodhead	1508-9th St Rock Springs Wyo
Yoriam Woodhead	" " " "
Daniel L. Uhls	Box 333 Superior, Wyo.
Dale Ann McJoswell	1508 9th Rock Springs Wyo.
Mary Ann Goodwine	" " " "
Jackie Redman	Box 87 Pk. of Rocks, Wyo
[illegible]	823 7th St Rock Springs
[illegible]	823 7th St Rock Springs.
Sharon Esquibel	P.O Box 77 Superior
[illegible]	P.O. Box 77 Superior
[illegible]	P.O. Box 463 Superior
Kelly A. Wilson	415 E. St. Apt. #1 R.S. Wyo. 82901 362-8093

Please see the response to letter 39.

Donna Uhle	Box 332	Superior, Wyo
Bernie Uhle	Box 332	Superior Wyo
Billy Uhle	Box 332	Superior Wyo.
[illegible]	Box 303	Rock Springs, Wyo
[illegible] Hoffman	Box 136	Superior, Wyo
[illegible]	Box 454	Hanna Wyo
[illegible]	Box 165	Superior Wyo
[illegible] Stump	Box 136	Superior Wyo
[illegible]	Box 72	Superior Wyo 82945
[illegible] Gram	Box 25	Superior Wyo 82945
[illegible] Stromquist	Box # 841	Superior Wyo 82945
Shirley Green	Box 24	Superior
[illegible] Green	Box 24	Superior, Wy 82945
[illegible] Young	Box 17	Superior Wyo 82945
Steve Holmes	P.O. Box 222	Rock Springs Wyo
Denise Elder	P.O. Box 222	Superior, Wy
Yolande Moynihan	P.O. Box 71	Superior Wyo
Ed Moorkyham	P.O. Box 71	" "
Molly Georg	Box 755	Superior, Wyo
[illegible]		Superior Wy
Nesty Carlson	Box 302	Superior Wy
Margaret Lowe	Box 431	Superior, Wy.
[illegible]	Box [illegible]	[illegible]
Matt Chollak	1425 Carlon	Ft Nah Springs Wyo
Doug Wolfer	845 Westvile	Hill Rock Springs Wyo
Robert Fay		
Jay Meinz		P.O. Box Superior
Jimmy Koop	Box 63	Superior
Jerry Koop	Box 63	Superior
James Hower	1130 Burnside Ct.	RSI
G.L. Homy		Superior
[illegible]	# 165	Superior
Jer Boyce	"	"
Michael Baum		
Tom Grant		Superior

MOUNTAIN FUEL SUPPLY COMPANY
180 EAST FIRST SOUTH · P.O. BOX 11368 · SALT LAKE CITY, UTAH 84139 · PHONE (801) 534 5729

C.F. COLEMAN
SENIOR VICE PRESIDENT

June 13, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

(1) Mountain Fuel's comments relating to the proposal of the Rocky Mountain Liquid Hydrocarbons Pipeline draft environmental impact statement are addressed as follows:

At Clay Basin, Utah, Mountain Fuel Resources, Inc., a subsidiary of Mountain Fuel Supply Company, has developed an underground gas storage project. The MAPCO pipeline could cause a potential impact to the present activity and future plans. This impact could be overcome through close coordination between MAPCO and Mountain Fuel Resources. Resources desires to work closely with MAPCO to further its proposal, but requests the right to approve the location of any MAPCO facilities to be installed in Clay Basin in order to avoid conflict with the storage project.

Secondly, a potential impact could be encountered at Richard's Gap, Wyoming, the north side of Clay Basin. Richard's Gap consists of a steep, narrow pass with Red Creek cutting into the gap. Mountain Fuel Supply Company's pipeline is already in the roadway that traverses the gap area. The line is suspended on the Red Creek Bridge. If the Richard's Gap route is selected, it will be necessary that MAPCO coordinate its activities with Mountain Fuel Supply Company to avoid conflict with the road, bridge, and existing pipeline facilities.

(2) We support the route that has been proposed following the existing Red Creek wilderness area boundary around the base of Little Mountain. However, Mountain Fuel Supply Company has a right-of-way at the head of Little Mountain on which we have experienced massive slide movement over the last three years. This has caused Mountain Fuel Supply Company to relocate a portion of its pipeline from the original right-of-way to a lower bench with a temporary surface line. A route which would traverse around the head of Little Mountain would encounter severe terrain and associated impacts. We would like to suggest a change in the proposed

(1) MAPCO would coordinate its activities with any adjacent utility prior to construction. Please refer to letter 24, comment 1.

(2) The Wyoming State Office is reinventorying the boundaries of the Red Creek Badlands-Tepee Mountain Wilderness Inventory Unit. As discussed in the Summary, the agencies' preferred alternative for this area is to delay the action. This decision would allow for further evaluation of the WSA problem.

MAPCO's proposed action was sited to avoid the Little Mountain landslide (see Map A-3).

Rocky Mountain Liquid Hydrocarbons Pipeline
Page 2

(2) cont. Red Creek wilderness boundary. We suggest that the boundary follow the inventory unit boundary where there is a natural separation of land features following an existing seismic trail. This would provide more solitude, keeping the wilderness area away from the easy access of pack trail which would be more conducive to the wilderness philosophy. A right-of-way at the toe of Little Mountain could be established for the MAPCO line and the relocated Mountain Fuel pipeline, providing a solution to the landslide problem. This would be a natural, economical and feasible solution. (See enlarged map of Little Mountain, Exhibit A).

(3) If the Pine Mountain alternative were selected, the MAPCO line would descend the north slope of Pine Mountain following our existing right-of-way in the Jim Springs area. The corridor varies in width from 10 to 20 feet. The Mountain Fuel pipeline is a surface line which was installed without damage to the vegetation. It would be better to descend Pine Mountain following existing roads than to follow the Mountain Fuel surface pipeline.

(4) Overthrust Pipeline Company, through its environmental consultants, Ecology and Environment Incorporated, P.O. Box D, Buffalo, New York 14225, performed extensive route analyses for a route which would bypass heavy development in the Green River, Wyoming area. A portion of the proposed MAPCO route which would cross the Green River south of the city of Green River, was rejected by the consultants due to severe terrain and erosion potential. The Overthrust Pipeline route, north of the city of Green River, was selected as the preferred route and extensive field surveying and archaeological work has been performed on that route (shown on Exhibit A). It is suggested that the proposed MAPCO Pipeline follow the Overthrust Pipeline corridor.

The proposed MAPCO route has been shown traversing through Mountain Fuel's existing LeRoy Storage facility and proceeding northwesterly across Hogsback Ridge, which is a major topographic feature in the area. The Overthrust Pipeline proposes to cross the Hogsback in a natural gap along an already existing road and will follow existing roads to the Ryckman Creek, Whitney Canyon area. It is suggested that the MAPCO route follow the Overthrust Pipeline corridor to the Ryckman Creek, Whitney Canyon producing areas as shown on Exhibit A.

Many portions of the MAPCO alignment are shown as following other Mountain Fuel pipelines. It is essential that Mountain Fuel Supply Company be involved in the site-specific location of the line to avoid potential adverse impact to our facilities.

Very truly yours,

C. J. Ackerman

Enclosure

cc: Director, Utah State Office, B.L.M. w/o enc.
Director, Wyoming State Office, B.L.M. w/o enc.
District Manager, Rock Springs Dist. Office, B.L.M. w/o enc.

(3) If the Pine Mountain alternative is approved, this information would be considered in approval of the specific alignment.

(4) Discussion of routing through the town of Green River has been expanded in the FEIS, pages 1-31 and 1-37. The DEIS, page 4-5 also discusses MAPCO's revision of its proposal through the area. Alternative route suggestions will be forwarded to MAPCO. Should MAPCO's proposal be approved, MAPCO would coordinate construction activities for those areas where Mountain Fuels' pipelines would be affected.

RECEIVED
BLM ROCK SPRINGS
DISTRICT

JUN 6 80

DM ____ OPER ____
ADM ____ SP ____
MO ____ SO ____
ADMIN ____ DS ____
RES ____ SW ____
RE ____ PINE ____
LL PERS ____ KEM ____

1600 Indian Hills Dr. #68B
Green River, WY 82935
14 June, 1980

Bureau of Land Management
Rock Springs, WY 82901

Greetings:

We wish to express our opposition to the proposed MATCO pipeline route through the Pine Mountain area. Southwestern Wyoming has so little undisturbed land. We feel it is criminal to despoil the few areas we do have.

Hundreds of pipeline corridors already crisscross the desert in the vicinity. There is no reason why MATCO cannot route along one of the existing corridors. Thank you.

Sincerely,

Kathleen Schwartz
Staff Archeologist, Western Wyoming Geo

Wesley Hardey
Chemist, FMC Corp. Green River

RECEIVED
JUN ...
DEPARTMENT OF THE INT...

Please see the response to letter 39.

91

627 4th Ave. West
Rock Springs, Wy. 82901
June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico

Dear Sir:

We oppose the pipeline route of MSPCO which proposes to cross Green River and go up Jesse Ewing Canyon to Clay Basin. Needless exploitation of the river in case of a leak is unacceptable while Narrow Jesse Ewing Canyon would irrevocably be changed.

The BLM alternative is equally unacceptable. They want to go over the east slope of Teepee Mountain, and over the top of Pine Mountain through the last bit of forest in Sweetwater County.

The following letters (91-97) were received from residents of Sweetwater County, Wyoming. They express concern over the selection in the DEIS of Pine Mountain as the agencies' preferred alternative. They also state a preference for a route following Highway 430.

The selection of the Pine Mountain Alternative was based on slight site-specific differences and agency and public preferences known at the time. However, the delay of action alternative has been selected in the FEIS for the tri-state area (MP 800-863) to allow the BLM to continue to analyze both the Proposed Action and the Pine Mountain Alternative.

The specific resource concerns which resulted in the screening of a route following Highway 430 are summarized in DEIS pages 1-32 and 1-36 and in the response to letter 12, comment 4.

Please accept the most feasible and inexpensive route down Highway 430 where no fragile forests or narrow canyons or wide rivers exist.

Sincerely,
Julie L. Fair
Leslie L. Fair

June 10, 80

Dear State Director,

I would like to inform you that I do not agree with the BLM proposal to take the pipeline through our forest. I would like to request that they route the line up highway #30.

Sincerely,
Carolyn Harrison
Cavallo

June 12, 1980

BLM State Director
P.O. Box 1449
Santa Fe, NM 87501

Dear Sir,

We are very upset to learn that the local BLM office has recommended the proposed MAPCO pipeline be re-routed through one of our two forested mountains. We in the desert with so few trees cherish our only forested land in the county. My family and friends spend many recreational hours on this land and it would be a shame to see it scared by a pipeline and other utilities which are bound to follow. Please also think of the wildlife that will be affected.

I strongly support routing the pipeline up Highway 430. Not only would this save on the utilities maintainence problems but it would save our forest!

Thank you,

Kurt and Jeanette Jackman

June 13, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir or Madam;

The pipe line route you are proposing for MSPCO is a very unfortunate choice. It will endanger the elk habitat and destroy some of the very few forested acres in Sweetwater County, Wyoming.

The fact that you have available the very reasonable alternative of using the existing utility corrodor along Highway 430 only makes your decision more shortsighted.

I hope it is not too late for this decision to be reversed. Please reconsider.

Sincerely,

Janice C. Newberry

Janice C. Newberry
208 Mtn. View
Rock Springs, Wyoming
82901

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir,
I am opposed to the B.L.M. proposal to put the MAPCO pipeline over Pine Mountain or Little Mountain.
Please reconsider the proposal to put the pipeline up Highway 430.

Bertrand de Payen

1201 9th St.
Rock SPRINGS
WYO 82901

Stanley K. Costantino
222 Jade Street
Rock Springs, WY 82901

June 18, 1980

BLM State Director
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

I do not agree with the BLM plan to put the Mapco pipeline through a forested area. My family, friends, and I use the Little and Pine Mountain areas regularly as they are the only forested mountains in this section of Wyoming.

I request that the pipeline be rerouted by way of Highway 430.

Very truly yours,

Stanley K. Costantino

Stanley K. Costantino

P.O. Box 2204
Rock Springs, Wy 82901
June 13, 1980

State Director
Bureau of Land Management
P.O. Box 1449
Sante Fe, New Mexico 87501

Dear Sir:

We would like to go on record as opposed to the proposed pipeline route by MSPCO from the Overthrust belt in western Wyoming to Texas. The route through Jesse Ewing Canyon would destroy the canyon, which is too narrow for a 50 foot right of way through it. The BLM alternative proposal that would route the pipeline over Teapot and Pine Mountains would destroy the last stands of virgin timber in Sweetwater County.

We believe the pipeline should be laid along Highway #430 or existing right of ways where no canyons, forests or large rivers exist to cause engineering or environmental problems.

Thank you.

Sincerely,
Jo Larson
Robert L. Larson

United States Department of Agriculture
Soil Conservation Service
4012 Federal Building
125 South State Street
Salt Lake City, UT 84138

June 20, 1980

State Director (922)
Bureau of Land Management
P. O. Box 1449
Santa Fe, New Mexico 87501

Dear Sir:

We have reviewed the April 1980 draft of MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline Environmental Impact Statement. Areas of concern where SCS has interest and/or expertise have been adequately addressed. We have no specific comments.

We appreciate the opportunity to provide input to this project, and to review and comment on the draft Environmental Impact Statement.

Sincerely,

Harold F. Brown, acting

GEORGE D. MCMILLAN
State Conservationist

The following letters (98-102) were not received in time to prepare responses, however, they have been included as a record of public comment.

SWEETWATER COUNTY
WILDLIFE ASSOCIATION
2235 N. Teton Blvd.
Green River, Wy. 82935
June 14,1980

Mr. Larry Woodard
Acting State Director
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

Dear Mr. Woodard;

Please accept my appreciation for the opportunity to respond to the MAPCO Rocky Mountain Hydrocarbons Pipeline EIS. I must admit, however, that because I have only had a copy of the EIS in my possession since the June 3,1980 public meeting held in Rock Springs, that I am very limited in being qualified to address the specifics of the proposal. I must be very general in my remarks. Even though I am president of a very active wildlife organization, one that is known statewide, because of some foul up on the part of the BLM we were not given a copy of the EIS until I attended the public meeting June 3,1980. Because of the problems the BLM had with their mailing lists whereby many organizations (I know of several) did not receive copies of the EIS, I feel it appropriate that your office extend the period for public comment for a period of one month commencing at a time that the public be given notice of such extension. The purpose of the EIS process is to receive (and incorporate) public input into the final statement. This would be somewhat impossible in this instance since many organizations and individuals were omitted.

It seems evident that the natural resources (including wildlife habitat, scenic ...) of one state were given priority over another state's valuable resources. Is there some explanation why a route extending down highway 430 south of Rock Springs into Colorado was not considered. This would seem one of the best routes since the pipeline could follow an already existing highway; minimum habitat, soils, scenic etc. degradation should be expected. It is incomprehensible to me that the people of Southwestern Wyoming would be asked to approve another corridor, another routing of a pipeline across our region when it would be possible to follow already existing routes. One must consider a key point in question; that of the cumulative effects and

impacts to Southwestern Wyoming caused by all developments. There are already countless pipelines, roads (for maintainance and access) pump stations, drill sites (abandoned and producing) coal developments, and other countless impacts brought upon us by increased population and whenever a new pipeline is considered we must look at the entire situation; taking into account the cumulative effect upon our sensitive critical wildlife habitat, scenic values, soils, erosion, and small forested areas which are necessary to a tri state elk herd.

Our wildlife organization wish to go on record as being in strong opposition to the Pine Mountain route and the Little Mountain route based on impacts to critical wildlife habitat, soils, forested areas, scenic values, recreation values, and because such permanent damage could result to these areas with the introduction of this pipeline into these areas. Who would halt other companies, other pipelines through these areas once this pipeline has already created a corridor through these critical areas? Again, in future years, the cumulative effects to the areas could prove disastrous. Both these mountain route proposals are at high altitudes and receive high amounts of snowfall during the winter. This would necessitate the use of large, heavy tracked equipment usage during winter maintainance which would damage the very sensitive soils, wildlife habitat and virtually eliminate the area from being scenic.

It would be much more acceptable to our organization for the MAPCO Pipeline to follow already existing highways as much as possible to facilitate maintainance, reduce impacts, and to impact the land as little as necessary. Following a utility line right of way over Little Mountain would not fall into this preferred category.

I urge you to consider seriously the above recommendations, taking into account the impacts caused to wildlife, scenery, soils and the possible loss of forested areas that would result by cutting a pipeline through these should the Little Mountain or the Pine Mountain Route be implemented. Jessie Ewing Canyon would seem not acceptable either since that route would be routed too near a National Park area and the canyon is not adapted to placement of a pipeline. Red Creek Badlands should also not be considered, nor should any other wilderness study area since they have characteristics unique to a wilderness setting which shouldn't be disturbed or destroyed. Therefore, please follow already existing routes, highways . Thank you.

John C. Barnes Jr. President

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

ED HERSCHLER
GOVERNOR

June 16, 1980

State Director (972)
Bureau of Land Management
P.O. Box 1449
Santa Fe, NM 87501

Gentlemen:

The draft environmental impact statement for MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline has been circulated for review by our state agencies. Copies of their comments are enclosed for your consideration and use. I call your attention to the comments provided by our State Highway Department regarding requirements for advance permission for pipeline crossings or encroachments on state highway and county road right-of-ways. Right-of-way permits must also be obtained from the Commissioner of Public Lands prior to any construction on or access across lands owned by the State of Wyoming. I request full cooperation on the part of the project proponents and your agency in submitting information necessary to the issuance of these and any other state-specific permits or project clearances.

Please keep me informed of any further progress on this project. Thank you.

Yours sincerely,

Ed Herschler

EH:pcd
enclosures

THE STATE OF WYOMING

Ed Herschler, Governor
Lane Monaghan, Superintendent and Chief Engineer

Wyoming State Highway Department

P. O. BOX 1708 CHEYENNE, WYOMING 82001

May 9, 1980

MAPCO's Rocky Mountain
Liquid Hydrocarbons Pipeline
State ID No. 80-119

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Dear Mr. Hartman:

We have reviewed the Draft Environmental Impact Statement for the above proposed pipeline and wish to clarify the statements made on Pages 1-3 relative to pipeline crossings or encroachments on state highway rights-of-way. It is the responsibility of the pipeline company to obtain advance permission for crossings or encroachments from the District Engineer, Wyoming State Highway Department, P. O. Box 1260, Rock Springs, Wyoming.

Crossings or encroachment of County roads should be cleared in advance with the respective County Commissioners.

Very truly yours,

William P. King

William P. King, P. E.
Environmental Services Engineer

WPK/FKS:lt

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

SOLID WASTE MANAGEMENT

HATHAWAY BUILDING

CHEYENNE, WYOMING 82002

TELEPHONE 307-777-7762

MEMORANDUM

TO: Mr. Robert E. Sundin

FROM: Mr. Charles A. Porter

DATE: May 27, 1980

SUBJECT: MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline

This should have little impact on Solid Waste Management. If, however, the pipeline breaks, there may be disposal problems the Solid Waste Management Program would be involved in.

STATE OF UTAH
Scott M. Matheson
Governor
Kent Briggs
State Planning Coordinator

Division of Policy and Planning Coordination
Intergovernmental Relations Section
Lorayne Tempest, Associate State Planning Coordinator
124 State Capitol
Salt Lake City, Utah 84111
533-4981

A-95
State Clearinghouse
533-4976
533-4971

Environmental
Coordinating
Committee
533-5794

Human Resources
Coordinating
Committee
533-4981

A-95
Federal/State
Coordination
533-6063

Federal Resource
Information
Center
533-4983

June 20, 1980

State Director (922)
Bureau of Land Management
P.O. Box 1449
Santa Fe, New Mexico 87501

SUBJECT: Draft EIS, MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline. (SAI #80042809B)

Dear Sir:

On June 12th of this year I wrote you a letter with responses and comments from the Utah State Environmental Coordinating Committee. At that time I informed you that comments from the Division of Wildlife Resources would be forthcoming and mailed to you under seperate cover; please find said comments included with this letter.

Thank you again, for the opportunity to review and comment on this project.

Sincerely,

Lee M. Allen

Lee M. Allen
A-95 Coordinator

LMA:ba
Enclosure

state of utah

DIVISION OF FISH AND WILDLIFE RESOURCES
DOUGLAS F. DAY
Director
1596 West North Temple/Salt Lake City, Utah 84116/801 533-9333

June 18, 1980

Mr. Lee Allen
A95 Coordinator
State Planning Office
State Capitol
Salt Lake City, Utah 84111

Dear Lee:

We have reviewed the draft environmental impact statement MAPCO's Rocky Mountain Liquid Hydrocarbons Pipeline and offer the following comments. Since the pipeline is in northeastern Utah, exits into Colorado and enters Utah again in southeastern Utah, we will comment by each area.

Northeastern

The principal impacts from a project such as this would result from construction during critical times of wildlife use on a given area. We have updated information on Tables 1-8 and 1-11 to more accurately reflect the areas and times when construction should not take place. We have modified to some extent the time periods originally given to MAPCO as well as the exact areas involved. This has been necessary because we did not have mileposts or large-scale maps for our original response. This updated information should be included in the final statement.

Our preferred route is still the Little Hole alternative. The corridor is already present in this area and it would cross much less critical big game ranges than would the Mainline and Pine Mountain routes.

If a decision is made to construct the pipeline on the Rye Grass, Jease Ewing, Clay Basin alignment, we strongly object to the Pine Mountain alternative. This route would pass through critical deer, elk, antelope and sage grouse ranges in the Three Corners area, and the impacts would be significantly greater than the Mainline route following Red Creek through Clay Basin into Wyoming. This has been discussed with the Wyoming Game and Fish, and they fully agree with the Red Creek route and are likewise strongly opposed to the Pine Mountain alternative. They have requested our support in their opposition to this route.

The requested right-of-way is 50 feet for the construction. We feel that, in most cases, 30 feet would be adequate with provision for increasing the width where special conditions are evident. Where the project crosses Division lands, only a 30-foot right-of-way will be granted. BLM has indicated that they also will stipulate 30 rather than 50 feet.

Mr. Lee Allen
June 18, 1980
Page 2

With proper reseeding and careful avoidance of potential new access for vehicle travel, we feel that the MAPCO project will have little permanent negative impact to our management program. Proper timing of construction activities should adequately reduce most short-term impacts.

CRUCIAL WILDLIFE USE AREAS AND PERIODS
TO AVOID CONSTRUCTION OF PROPOSED ACTION
BETWEEN MILEPOSTS

	No Construction Period	Reason
Mainline		
Deer and elk		
788-800	November 15 to May 1	Crucial winter range
807-821	November 15 to June 1	Crucial winter and spring range
823-state line	November 15 to May 1	Crucial winter range
Antelope		
745-755	May 15 to June 20	Crucial fawning area
821-824	May 15 to June 20	Crucial fawning area
828-state line	May 15 to June 20	Crucial fawning area
Sage grouse		
800-817	March 15 to June 1	Crucial strutting and nesting areas
823-826	March 15 to June 1	Crucial strutting and nesting areas
828-state line	March 15 to June 1	Crucial strutting and nesting areas
Waterfowl and riparian		
821-823	March 15 to June 15	Crucial riparian and waterfowl nesting area
Brown trout		
822	Fall	Spawning

Mr. Lee Allen
June 18, 1980
Page 3

	No Construction Period	Reason
Fine Mountain Alternative (DEG)		
Deer and elk		
28-state line	November 15 to May 1	Crucial winter range
Antelope		
28-state line	May 15 to June 20	Crucial fawning area
Sage grouse		
28-state line	March 15 to June 1	Crucial strutting and nesting area
Little Mountain Alternative (DF)		
Deer and elk		
0-12	November 15 to May 1	Crucial winter range
12-19	May 10 to July 1	Crucial calving and fawning area
19-state line	November 15 to May 1	Crucial winter range
Antelope		
24-state line	May 15 to June 20	Crucial fawning area
Sage grouse		
0-10	March 15 to June 1	Crucial strutting and nesting areas
24-state line	March 15 to June 1	Crucial strutting and nesting areas
Brown trout		
822	Fall	Spawning

Mr. Lee Allen
June 18, 1980
Page 4

Southeastern

The area bisected by the pipeline may on occasion and during different seasons of the year be inhabited by as many as 421 species of vertebrate wildlife. Currently, the endangered Colorado River squawfish, humpback chub and bonytail chub inhabit the Colorado River. Also, the endangered northern bald eagle is a winter resident (November 15 through March 15) of the area bisected by the proposed pipeline. There are no known roost trees in the area for bald eagles. The endangered American peregrine falcon is also an inhabitant of the area, but no aeries are known along the proposed pipeline. All of the areas crossed by the pipeline that are inhabited by prairie dogs are potential habitat for the endangered blackfooted ferret. Sightings of blackfooted ferrets are frequently reported from southeastern Utah; however, the only confirmed sighting is from the Blanding area in the early 1950's.

The first 16 miles of the pipeline passes through a high priority use area for the Cisco desert antelope herd. A majority of the use by the antelope occurs east of Westwater Wash. The next 58 miles of pipeline cross a desert shrub area ranked as being of limited value to wildlife. At the point where the pipeline crosses the Colorado River, the riparian and marshland habitats are ranked as being crucial-critical to Utah's wildlife. These specialized habitats are extremely productive and limited due to the desert character of the area. The next 18 miles of pipeline through Moab Valley and Spanish Valley pass through an area of desert shrub adjacent to Utah Highway 163 and some agricultural areas; this area is ranked as being of limited value to wildlife. The next 14 miles of pipeline will pass through high priority deer winter range, followed by 4 miles of desert shrub ranked as limited value; then 1 mile of crucial-critical deer winter range, followed by 22 miles of pipeline in high priority deer winter range.

It is recommended that construction of the pipeline not be allowed in the first 9 miles from the Utah-Colorado state line to Westwater Wash between May 15 and June 20 of any year. This will mitigate for disturbance that would impact crucial-critical kidding areas for pronghorn antelope. Additionally, it is recommended that no construction be allowed on high priority antelope use areas during periods of severe snow conditions.

No construction activity that crosses the Colorado River should be allowed during July of any year. This will mitigate for disturbance to the endangered fish species that make spawning runs during July. Efforts to reduce siltation should be demanded for any crossing of the Colorado River.

The riparian and marshland areas along the Colorado River near Moab should be avoided if possible. They should not be impacted between March 15 and June 15 of any year if intrusion is allowed. This vegetative community supports a diverse and abundant population of wildlife species. The spring period is critical for breeding and rearing processes. A nesting population of Canada geese is of special concern in this area. Revegetation of the drier upland sites adjacent to the marsh with grasses and forbs should be accomplished.

Mr. Lee Allen
June 18, 1980
Page 5

Construction should not be allowed on crucial-critical or high priority deer winter ranges between November 1 and May 15 of any year. This will reduce impacts of disturbance to wintering deer.

Reclamation should be accomplished at all disturbed sites as soon as possible after disturbance. Due to precipitation and other weather factors for the area local to the pipeline, seeding should be done as late in the fall as possible. It is recommended that the area manager for BLM's Grand Resource Area office in Moab be contacted for suggestions on reclamation in this area of Utah. Seed lists should contain species that are suitable for the area and palatable to wildlife. Perry Plummer's 1968 publication titled "Seasoning Big Game Range in Utah" is a valuable reference for reclamation that will benefit wildlife.

General

A pipeline rupture at any of the river crossings in or above endangered fish habitat could be disastrous. Extraordinary precautions must be taken in design and installation of the pipeline at these points. If possible, automatic pressure shutoff valves should be provided on each side of the Green and Colorado rivers so that, if the pipeline ruptures within the crossing, only the contents of that immediate section of pipe would enter the river.

Throughout the region traversed by the pipeline, riparian and canyon bottom vegetation is a unique, highly productive habitat type that is in critically short supply. Therefore, as a general rule, these areas should be avoided where possible. At stream crossings, disturbance of riparian habitat should be kept to a minimum.

We appreciate the opportunity to comment on this project.

Sincerely,

Douglas F. Day
Director

16 June 1980 Mr. D.W.King
P.O.Box 1869, Rock Springs, Wyoming

State Director (922)
Bureau of Land Management
P.O.Box 1449
Santa Fe, New Mexico 87501

Sir;

Concerning the Draft Environmental Impact Statement (DEIS) for the MAPCO's Rocky Mountain(Mt.) Liquid Hydrocarbons Pipeline, I have a number of concerns which I feel should be expressed.

By training from Humboldt State University, Arcata, California, I am qualified as a "WILDLIFE MANAGER/BIOLOGIST". In addition, I have four academic years of experience commenting on other EIS's. This background was enhanced by my membership with the Conservation Committee of The Humboldt Chapter of the Wildlife Society. Finally, I have one summer season as a Biological Technician (Wildlife), in Oregon, and two summer seasons as a Forestry Tech. in Idaho and, this year, in Wyoming with the B.L.M. Most of my concerns will deal with the WILDLIFE PORTIONS of the DEIS, and the remainer will relate to Forestry.

At least listings are given (Ch.2, Table 2-2 and 2-3) for federal- and state-listed THREATENED and ENDANGERED SPECIES. However, the potential impacts on each animal have not been explained. Until the required ESA, Section 7 consultation process is completed, I feel justified in supporting the "DELAY OF PROJECT" alternative #18 (Ch.1, Table 1-9,p.1-31). Jim Roeder, Wildlife Biologist at the Rock Springs,Wyoming B.L.M. mentioned that MAPCO has already cleared a pipeline route in Colorado. If this is true, I feel that MAPCO has violated ESA,Section 7.

The Whooping Crane (Grus americana) is known to occur in Wyoming (Wyo.Game and Fish 1977:62) as well as a number of other states like Idaho,Utah, and Colorado (Dr. Trowein, personal communication). Dr. Trowein advised me that only 15 cranes are known to exist in this second population. He also informed me that juvenal and subadult birds wander widely during migration, thus they might occur anywhere in the states mentioned above in suitable habitat (prairie pools and marshes). In no part of the DEIS could I find a "PLANT COMMUNITY MAP" indicating where wetland areas (or crucial wildlife areas) are in relation to the proposed pipeland route or alternative routes.

The Black-footed Ferret (Mustela nigripes) is also a very important animal in Wyoming. Both U.S.Fish and Wildlife Service and Wyoming Game and Fish don't know if a viable population of Ferrets exist within Wyoming, or any other state to insure its continued existance (Wyo. Wildlife, June 1980:12-15). In addition to this animal, if any of the listed species (Table 2-2 and 2-3) are determined to occur near this pipeline proposal, then I would strongly support the "TAKE NO ACTION" alternative #17 (Ch.1, Table 1-9, p.1-31).

The 1972 amendment to the MIGRATORY BIRD TREATY ACT (16 U.S.C. 703) protects all birds of prey at least from hunting and egg collecting pressures. The bald Eagle Act specifically protects both Bald and Golden Eagles. Finally, Utah also has a Game and Fish Law (23.1-1k, Protected Birds, revised 1978). This pipeline proposal would remove 7,101 acres (total acreage from all states) of potential hunting, roosting, loafing, and/or nesting habitat for raptors.

Raptors, except Kestrels (Falco sparverius), Red-tail Hawks (Buteo jamaicensis), and Turkey Vultures (Cathartes aura) tend to avoid the presence of man, but rodents tend to increase with man's presence. I feel that this pipeline would upset a balanced predator-prey relationship.

The maps (Map 14 and 15 of 18) are not specifically detailed enough to illustrate exactly where the proposed pipeline route will be located. However, if both Pine Mt. and Little Mt. are entirely missed then I'm in favor of the proposed route: EAST OF LITTLE MT. Pine Mt. is considered a "FRAGILE SITE" (Standard Specifications: Stage II, Inventory Handbook 1978, Item 231, Para. 3, p.7) with its 60% south slopes (J.West, Forestry/Recreation Planner, Rock Springs B.L.M.). In addition, Pine Mt. is the home of several cavity-nesting birds and a nesting area for Turkey Vultures (Dick Randall, personal communication). The fragile alpine/subalpine vegetation on the summit would require more like 450 years to return to normal rather than 3-5 years as stated in the DEIS (Ch.3,p.3-20).

If a rupture should occur, it appears that on maps 11 and 13, this proposed pipeline is dangerously close to Dinosaur National (T.4S,R25E) and within Arches National Park at Moab Valley (T.25S, R.21E). Also, at least one Waterfowl Management Area (Browns Park NWR, Colorado) is close to the proposed route. This area and one other was not shown on any of the maps in the DEIS.

A rupture concerns me very much, because I can see much more than one acre of land (potential wildlife habitat) being destroyed by these hydrocarbons. It takes precious time for the "Control Center Operator at Tulsa to identify and pinpoint" a rupture anywhere along the pipeline. More time is needed for the remote control signal to reach the proper pumps and valves to affect a change. Finally, still additional time is required for the company employee nearest the rupture to arrive at the site and employ corrective measures. If some malfunction(s) occurs in the communication process, then more delay occurs. During all this time, toxic substances are destroying vegetation, soils, and/or water and associated life forms. I feel that an adequate explaination of "Backup systems" and "Emergency Procedures" during a rupture was not provided in this DEIS.

SUMMARY OF RECOMMENDATIONS

1) Use Alternative 18 (delay of project), at least, until the required BGA, Section 7 consultation process is completed.

2) Use Alternative 17 (take no action) if any federal- or state- listed Threatened and Endangered Species are found near the proposed pipeline route(s).

3) Avoid the Pine Mt. and Little Mt. alternatives: # 8 and #10.

4) Make all maps (1 through 18) more site specific.

5) Avoid all National Parks, Monuments, Waterfowl and Wildlife Management

Mr. D. W. King

Public Hearing Statements and Comments

Copies of verbatim transcripts are a part of the EIS record (available in the MAPCO EIS background files, BLM NMSO). The full transcripts will be considered with equal weight in the final decision to that given to letter comments. Comments received at the Rock Springs Hearing have been reiterated and responded to, especially in letters 12 and 17. Following are the substantive comments and responses from the Farmington Public Meeting.

Farmington Public Meeting

1. Comment from Jack Scott:

On page 1-7 of the report it states: "The pipeline would be near existing pipelines or other existing ROWs for approximately 92 percent of its length. Corridor analysis, i.e., consideration of future use of the proposed routes by other projects, was not considered."

Response:

As stated in the DEIS on page 1-7, corridor analysis was not attempted. In the absence of a specific proposal, it was determined that the environmental effects and impacts identified for this project could differ with future projects. Any additional proposals would need to be analyzed on a case-by-case basis.

2. Comment from Jack Scott:

It seems that the federal government in their environmental aspects for forming corridors across the United States are causing great hardship on private property owners within the areas adjacent to federal lands because of federal government dictates on BLM, Forest Service, BIA ground where these corridors are going to be. There is no consideration given private lands adjoining these areas. The federal government has vast quantities of land on which these lines can go, but then limits them to a small area. Whereas the private individual has very small holdings in comparison to the federal government. When you have a corridor of five or six different public utilities passing through a farm or ranch, it destroys that farm or ranch.

I feel that this should be looked at from the private standpoint in the impact statement as to what this policy is doing. They should look at how these other utility lines are going to affect private lands.

Response:

Environmental impacts to private lands resulting from the proposed project were evaluated. The concept of corridorization represents an effort to confine and minimize areas of impact. Affected landowners may view this as a hardship.

3. Comments from Jack Scott:

MAPCO in the statement on 1-22 has gone through a whole list of things that they are going to do as far as reseeding and everything, but if a person signs this lease and agreement for damages that they have brought around, MAPCO is not going to do any of this, it is the responsibility of whoever signs, really, the property owner. I feel that this should be discussed in the environmental impact.

Response:

MAPCO has agreed to numerous revegetation and reclamation items. However, the BLM does not have jurisdiction on private lands and therefore could require stipulations on private lands. It is the private landowner's responsibility to require what would be necessary. Impact analysis was based on combined natural revegetation and some erosion control and revegetation processes.

4. Comment from Jack Scott:

Also in the impact at 1-30, procedures for a major rupture, what is meant by high concentration of hydrocarbons in the third paragraph of this section? If a break occurred near a house or a major east-west highway or near the ski area up there, what damage and deaths might be expected, if any, on these lines? These things need to be further covered.

Response:

A high concentration (in the form of a vapor cloud) would be detectable by people.

Historically, the most likely causes of a rupture are external forces. Upon rupture, the pressure in the line would cause the product to discharge at a high velocity. It is unlikely that any injuries or deaths would occur unless the rupture was accidentally ignited.

5. Comment from Jack Scott:

Under Section 3-13, Prime and Unique Farmlands, what procedures will be used by MAPCO to insure that viability of lands will not be diminished? The existing Northwest pipeline up there still has areas on private ground where the viability of the land was permanently damaged.

Response:

Where Prime or Unique Farmlands occur on public lands, MAPCO would be required to save top soil or "double ditch" the line to ensure that the viability of these lands are not diminished; however, the BLM does not have jurisdiction over private lands and would be unable to enforce any stipulations for "double ditching" on private lands. Private land owners could require the same stipulations to ensure that the viability of their farmlands are not diminished.

6. Comment from Jack Scott:

Also in this section the final draft should address why or why not the proposed pipeline can or cannot go with the Northwest Pipeline Company's existing right-of-way. My understanding is that the Forest Service, also the Game and Fish in Colorado, are trying to require that they go within the existing right-of-way and not take new right-of-way.

Response:

On private lands, ROWs are negotiated and granted by the private landowners. The BLM has no jurisdiction on these private lands. The pipeline that goes through Bloomfield was located there prior to the establishment of the town. Since that time, the town has grown around the existing line and numerous houses have been built adjacent to the pipeline. Normally, MAPCO prefers to avoid pipeline locations in residential areas.

7. Comment from Jack Scott:

In closing, since there are still property owners along the proposed route who have not been contacted by MAPCO, and this is as late as last week, the hearing agency here should require MAPCO serve written notice to all affected people and time should be extended for these people to give written comments to the hearing agency.

Response:

In advance of issuance of the ROW grant, BLM does not have authority to require MAPCO to contact all affected people.

8. Comment from F. F. Montoya:

I already have two power lines, a 32 inch gas line and a four-lane highway through my Colorado property. I think this could be the best possible way to transport the hydrocarbon and save the land by using the trucks.

Response:

See the response to letter 38, comment 26.

9. Comment from F.F. Montoya:

Since BLM was doing the planning, maybe they could have been more informative in letting us in on the planning. MAPCO has yet to contact us. We have to find out from neighbors or phone calls. As landowners we have rights as taxpayers living in a free country and should not be dictated to. After all, we are the government and would like to think we are capable of taking care of our lands and what is done with it.

Response:

In an attempt to gain public input:

1. Notice of Intent to prepare on EIS was published in the Federal Register, Vol. 44, No. 134, on Wednesday, July 11, 1979. This also mentions intent to hold scoping meetings.

2. Scoping meeting announcements were mailed out the first of August. The announcement identified time, date and location of all scoping

meetings planned. The announcement was sent to 574 different government agencies and private individuals and organizations, as well as 519 different media located along the route.

3. In addition to the announcements, these were numerous newspaper articles published which identified the purpose, date, time and location of the scoping meetings held along the route. There were also several follow up articles published which identified where written comments should be sent.

10. Comment from Jack Ward:

I guess I have more of a question than anything else on Map 8-18. According to the legend, it says that the area right through Bloomfield is not near an existing right-of-way. It is my understanding, and I think some of the people here can probably verify it, there are at least two right-of-ways in that immediate area that this pipeline will probably go through. That is speaking a little differently than what Mr. Montoya said. In the particular area that I am concerned about, we have on Highway 64 an elementary school about three-quarters of a mile out towards Blanco on Highway 64, then a high school right on Highway 64-44. It concerns me if they start moving too many feet one way or another or a quarter of a mile east or west. It could involve those schools.

Response:

As the comment points out, there are many existing ROWs in Bloomfield. However, Map 8-18 shows that the line through Bloomfield is not near an existing utility ROW, as the proposal would not follow any one specific utility ROW. Since the time of the Farmington Public Meeting, the route has been revised as indicated in Appendix Map A-1.

11. Comment John Curtis:

My question doesn't concern the BLM so much as it does the fact that why couldn't the MAPCO pipeline follow the existing right-of-way? They want to go down through my land, which is small, but I have had several realtors tell me that I would lose $24,000 in land value alone if that pipeline goes through. I am sure the pipeline company is not going to offer me that kind of recompense.

There are two existing right-of-ways just to the east of us. One is a 26-inch pipeline with a 200-foot right-of-way, and the other is a 100-foot right-of-way that goes right down through the city. Our question is why can't they use those right-of-ways?

Response:

See the response to the Farmington meeting transcript, comment 6.

12. Comment from Bob Browning:

I would like to request at this point for a group of landowners that have become recently organized to help with some of these problem-solving situations a list of all the landowners' names in New Mexico, a list of the landowners, their addresses, and a legal description of the land that will be involved in the pipeline.

Response:

The BLM does not have this information. County records do provide land ownership information.

13. Comment from John Scott:

Why is BLM, Navajo-owned properties and privately-owned properties under three separate jurisdictions? You spell it out right here in your preliminary plan.

Response:

The land ownerships are different. BLM does not have jurisdiction over private and Indian lands.

14. Comment from Stella Montoya:

I think your maps are really off. It shows the pipeline coming through the eastern part of the state. As far as I am concerned, we are pretty well to the other corner of the state. If you look at the map, there is no way that you would think it would ever concern us.

Response:

The proposed pipeline would cross from southeastern to northwestern New Mexico and across the southwestern corner of Colorado.

15. Comment from Stella Montoya:

Another thing is I think the people are misinformed and they think when they get an existing pipeline if some other company has it MAPCO is not going to go in and put a pipeline in it. They are going to get another one beside it. They are going to all be draining. That is why I think you should use trucks or trains or other transportation.

Response:

The transportation by truck or train alternative was screened from detailed analysis because it was impractical and uneconomical. For further discussion please refer to response to letter 38, comment 26.

CHANGES TO THE TEXT

This section reproduces pages of the DEIS text which have been changed due to public comment, other agency review and internal review. Changes within the body of the text are indicated in bold type.

Material (commercial fill, sand and gravel, and other surfacing or construction material of common variety) under 43 CFR 3611, Noncompetitive Sales. These would be issued by the appropriate BLM District Office.

Bureau of Indian Affairs (BIA)

The BIA is responsible for the issuance of any grants of ROW for construction and operation of a pipeline through the following Indian tribal lands:

- Santa Ana Pueblo, 13 miles
- Zia Pueblo, 15 miles
- Southern Ute Indian Reservation, 5 miles
- **Navajo Alloted Trust land, 17.5 miles**

The BIA exercises the Secretary of the Interior's trust responsibility for review and approval of agreements between the Indian tribes and private companies concerning development on Indian land. Secretarial approval of actions on Indian lands, in his trust capacity, are independent of ROW approval on public lands. A grant of the proposed ROW and approval of any of the related developments discussed in this EIS does not commit the Secretary of the Interior to any decision regarding Indian lands.

The rights-of-way would be approved subject to standard requirements imposed by the terms and conditions of the ROW grant including duration of the grant, ROW widths, fees or costs, and bonding to secure obligations. Rights-of-way across Tribal Trust Lands administered by the BIA as well as Indian Tribal Fee Lands would be negotiated with the respective Indian tribes. Rights-of-way across individual trust (allotted) lands administered by the BIA would be negotiated with the individual Indian owners.

Authority for issuance of these rights-of-way would rest with the Superintendent in charge of the reservation on which the lands involved are situated in accordance with 25 CFR 161.25, Rights-of-Way Over Indian Lands.

U.S. Army Corps of Engineers (COE)

The COE is responsible for the issuance of two permits (Army Section 10) for the crossing of the Green (at Davis Bottom) and the Colorado rivers. Other river crossings meet the conditions of a nationwide Section 404 permit. The COE is also responsible for consulting with the U.S. Fish & Wildlife Service to ensure consideration of wildlife resources in the permitting process.

U.S. Fish and Wildlife Service (FWS)

The FWS is responsible for providing consultation concerning the possible effects of the proposed action on Threatened or Endangered Species as required by Section 7 of the Endangered Species Act of 1973, as amended. Consultation will be initiated and conducted in accordance with 50 CFR 402, Interagency Cooperation, Endangered Species Act of 1973.

U.S. Forest Service (FS)

Responsibility for crossing FS lands (San Juan and Ashley National Forests) is provided in Cooperative Agreement Number CA-NMSO-128 on file at BLM, NMSO.

This Interagency Cooperative Agreement provides for procedures and assigns responsibilities for the processing, granting, and administration of the right-of-way and related facility permits necessary for the proposed action. This agreement assigns the State Director, New Mexico, Bureau of Land Management, US Department of the Interior, as the Lead Agency and Forest Service, US Department of Agriculture, Rocky Mountain Region and the Intermountain Region as Cooperating Agencies.

Department of Transportation (DOT)

The DOT is responsible for ensuring that construction, operation, and maintenance of the proposed action would be in conformance with 49 CFR 195, Transportation of Liquids by Pipeline.

Advisory Council on Historic Preservation (ACHP)

Section 106 of the Historic Preservation Act of 1966, as amended requires that the President's Advisory Council on Historic Preservation have an opportunity to comment on any undertaking which affects cultural resources in areas listed or eligible for inclusion in the National Register of Historic Places in order to protect those resources. Executive Order 11593 (Protection and Enhancement of the Cultural Environment) mandates that all Executive Branch agencies, bureaus, and offices (1) com-

pile an inventory of the cultural resources for which they are trustee, (2) nominate all eligible government properties to the National Register of Historic Places, (3) preserve and protect their cultural resources, and (4) ensure that agency activities contribute to the preservation and protection of non-federally owned cultural resources.

The Advisory Council is responsible for implementing regulations through the process outlined in 36 CFR 800 (The Protection of Historic and Cultural Properties). **A proposed programmatic Memorandum of Agreement (MOA) to accomplish these requirements is under review by the Advisory Council. The Bureau of Land Management and the State Historic Preservation Officers have signed the agreement.**

State

The various state grants and permits would be obtained by the applicant. Each State Highway Department is responsible for providing permission to bore under highways.

Texas

Texas has no further permitting requirements.

New Mexico

The Commissioner of Public Lands would grant rights-of-way easements for crossing state land.

Colorado

The State Board of Land Commissioners would grant rights-of-way easements for crossing state land. The Division of Wildlife would grant easements for lands crossed which are owned by that division.

Utah

The State Board of Land would grant rights-of-way easements for crossing state land. The State Division of Wildlife Resources would grant easements for lands crossed which are owned by that Division.

Wyoming

The State Board of Land Commissioners would grant rights-of-way easements for crossing state land.

Other Jurisdictions

Irrigation and water conservation districts, drainage districts, counties, and other appropriate jurisdictions would be responsible to issue easements and permits as appropriate. For instance, relevant counties would grant permission to cross county roads and the Middle Rio Grande Conservancy District would need to grant permission to cross their drainage channel which runs parallel to the Rio Grande.

PURPOSE AND NEED

The purpose of the proposed pipeline is to transport liquid hydrocarbons from gas processing plants located in New Mexico, Utah, Colorado and Wyoming to existing facilities near Hobbs, in Gaines County, Texas (See Map 1-1 and Table 1-1). Hobbs Station is an existing MAPCO facility to which existing pipelines are connected. From Hobbs Station, the various shippers can have the liquid hydrocarbons transported through existing pipelines to either the Gulf Coast or the Midwest (Map 1-2). The applicant selected Hobbs Station as the point of connection for the proposed pipeline because of the existing distribution system. The station also has underground salt storage capacity of one million barrels. The existing storage capacity and connections to various existing pipelines provides shippers with decision flexibility for destination and delivery schedule. This flexibility of decisionmaking is similar in concept to the use of "wheeling" in electrical power redistribution of product from one owner to another or the exchange of the product in response to market conditions and demand destinations. The shippers can use the products at some destinations or sell the products for use at other destinations. Since this is a common carrier, the ultimate use and destination of the mixed-stream components are unknown and result from discretionary decisions by the various shippers involved. The proposed action indicates an initial capacity for 35,000 BPD and an ultimate capacity of 65,000 BPD. Anticipated production increases of liquid hydrocarbons in the Rocky Mountain Overthrust Area (the Area) (see glossary for definitions of various technical terms) have created a need for

additional transportation of the products from the Area since production estimates exceed local demand for the products. In early 1979 the total production of light liquid hydrocarbons in the area was approximately 18,000 BPD. **The present production of natural gas liquids (NGL) is linked to natural gas production. If natural gas is produced, NGL is produced. If the local market is saturated, the NGL must be stored, which is expensive. Consequently, total production costs may dictate that both NGL and natural gas will be left in the ground. With the pipeline, it becomes economic to extract and process more NGL and natural gas. More plants will be built and existing plants will expand their capacity.** Through contact with producers, the applicant has estimated that production increases would reach 43,000 BPD by 1982, 60,000 BPD by 1985, and 110,000 BPD by 1990. Further estimates indicate that at least 65,000 BPD would be available to export to other markets after satisfying local demand by 1990.

The transported liquid hydrocarbons would consist of a mixed stream of butane, ethane, iso-butane, natural gasoline and propane. Ethane is used in the manufacture of polyethylene materials. Propane is used for space heating, cooking, fuel and peak industrial loads. The butanes and natural gasoline are used by refineries for the manufacture of motor fuels. The proportional composition of the mixed stream would vary in accordance with the character of the natural gas being processed at the plants and with shipper discretion. Characteristically, the hydrocarbons are gaseous under atmospheric conditions. In storage and in the pipeline these products are handled and transported under pressure (between approximately 350 to 1,835 pounds per square inch [psi]) in a liquid state for more efficient transportation.

LEVEL OF ANALYSIS

Analysis of the effects of construction and operation of the proposed pipeline and related facilities includes the electrically operated injection pump units needed and installed by the various processing plant operators to make use of the common carrier pipeline. These injection pumps are small and visually appear as an integrated part of the plant. Any new construction of the processing plants would have to be in conformance with NEPA.

The analyses were otherwise limited to the project components for the proposed action and alternatives.

Corridor analysis, i.e., consideration of future use of the proposed routes by other projects was not considered. The environmental effects and impacts identified for this project would not necessarily be the same (or of the same magnitude) for future projects in the areas affected. The viability of this proposed ROW for future projects would need to be determined on a case-by-case basis. **Future proposed ROWs would have to comply with NEPA. It is beyond the scope of this EIS to analyze potential cumulative impacts of unidentified future proposals or projects.**

Cumulative impacts were analyzed insofar as other projects with potentially common construction schedules were identified. The addition of the proposed pipeline to the oil and gas industry infrastructure was also evaluated.

PROPOSED ACTION

Special Siting Considerations

As summarized in Table 1-2, the proposed action would be located on and would directly affect approximately 7101 acres of federal, state, Indian, and private lands. The buried pipeline would not traverse any lands under the jurisdiction of the National Park Service (NPS) (i.e., National Parks and National Monuments), or existing or proposed NPS and FS RARE II or Wilderness Study Areas. **However, since publication of the DEIS one potential Wilderness Study Unit (Red Creek Badlands-Tepee Mountain, Wyoming) has been expanded to include a 1-mile segment of the proposed action.** The proposed action would be near existing pipelines or other existing ROW for approximately 92 percent of its length (Table 1-3). The pipeline would cross 1 proposed Wild and Scenic River—the Green River (Brown's Park) at milepost 822. **One mile of the Flaming Gorge National Recreation Area would be crossed by the proposed action.** The proposed pump stations would be sited to avoid locations on or adjacent to cultivated lands, 100-year floodplains, and areas of crucial wildlife use.

Project Components

The following project components, including construction, operation, and maintenance were considered in the environmental analysis. As

appropriate, they are also subject to compliance with regulations and procedures for Cultural Resources and Threatened and Endangered Species. Specific locational details (topography, towns, land status, etc.) near the proposed action are shown on Maps 1 to 18 in Appendix A. The proposed pipeline system would consist of the following 8 elements.

1. 669 miles of 10 3/4" outside diameter (O.D.).

2. 194 miles of 12 3/4" O.D. main pipeline.

3. 309 miles of 6", 8", or 10" gathering system pipeline:

			Mileposts			
78 miles	of	6"	0	to	78	East leg, WY
91 miles	of	10"	0	to	91	West leg, WY
63 miles	of	6"	0	to	63	North leg, WY
23 miles	of	6"	0	to	23	Northwest leg, WY
23 miles	of	8"	91	to	114	West leg, WY
8 miles	of	6"	80	to	122	West leg, WY, UT
6 miles	of	6"	0	to	6	Rangely leg, CO
4 miles	of	6"	0	to	6	Patrick Draw, WY
3 miles	of	6"	0	to	3	Table Rock, WY
2 miles	of	6"	0	to	2	Lisbon, UT
8 miles	of	6"	0	to	8	Church Butte, WY

4. Five turbine-driven pump stations for transportation of 35,000 BPD initially, and 10 pump stations for ultimate capacity of 65,000 BPD when and if hydrocarbon production increases as estimated (see Table 1-4 and Figure 1-1 for pump station details). Electrical service (220 volts) and telephone lines would be newly installed at each pump station (Table 1-5). The proposed Dragon Pump Station would require a microwave tower.

5. Between 110 and 125 above-ground gate valves accompanied by the same number of check valves (see Figure 1-2 for illustration).

6. Between 27 and 32 above-ground scraper traps with check valves (see Figure 1-2).

7. To minimize corrosion of the pipe, cathodic protection systems consisting of groundbeds and rectifiers would be sited and installed after construction. The number of these and their locations are based on tests of pipe-to-soil potential and non-interference with other systems. However, about 18 cathodic protection rectifiers would be needed. These would be sited to be close as possible to existing power sources. Groundbeds are subsurface facilities. Rectifiers are metal boxes (of about 21 x 13 x 14 inches) attached to a power service pole about 35 feet high. Wires would be strung to these poles from the nearest source of electricity. These would be sited to avoid conflicts with performance of cathodic protection systems of other pipleines.

8. The applicant would install right-of-way markers that would be the size, color, type and number designated in accordance with the regulations of the U.S. Department of Transportation.

Construction of new access roads is not proposed for construction or operation of the proposed action. Existing roads or the ROW itself would be used for surface travel. Roads used would be maintained during and rehabilitated after construction. **Some existing roads may have to be upgraded to accommodate heavy equipment and materials.**

Operation and Maintenance. Aerial patrols would inspect the ROW at least every two weeks. Surface traffic would be limited to valve inspections which occur at least once every six months and ROW maintenance and emergency repairs to the pipeline. An operating and maintenance staff of about 15 permanent employees would be distributed in towns along the proposed route. The various pressures, flowrates and status information of the system would be telecommunicated from the pump stations to the applicant's headquarters in

Tulsa, Oklahoma, for monitoring by personnel on a 24 hour a day basis.

During winter, maintenance or repair operations would use equipment able to negotiate terrain and conditions. In areas of deep snow cover, access would be made by use of snow cats or helicopters. As necessary, and depending on conditions, terrain and site-specific problems, the pipeline may be repaired on a temporary basis and permanent repairs made during more favorable seasons.

Construction Methods

Land owners, permittees, and other regular users and developers of public lands in the ROW would be notified in advance of construction activities which could affect their business or operations. Notification to land owners would be given by mail. Local permittees and tenants would be notified in person a few days ahead of construction. Other notification would be made by various means, including placing signs at temporary road closures in advance of construction. Ranchers would be advised of any fence openings, disturbances to range improvements, or other range-use related structures in advance of construction. **Owners of existing ROWs and existing related utility facilities that are adjacent to the proposed ROW would be notified prior to start of construction.**

A pre-construction plan would be developed for BLM lands in accordance with 43 CFR part 2882.2-4(c), Management of Oil and Natural Gas Pipelines. The authorized officer would require plans for construction, operation, maintenance, and termination of the pipeline system. At a minimum, the plans would include:

- schedules for construction of the pipeline and all related facilities and estimated construction costs
- plans for the protection of the environment during construction, operation, maintenance and termination of the pipeline
- plans for emergency repair of any rupture during operation, containment of effluent and restoration of damage.

For FS administered lands, the applicant would also prepare a project construction plan, fire plan, a landscape plan, and a maintenance plan. These plans would be approved by the authorized officer prior to commencement of construction of the project and would include:

- the construction plan, including the alignment of the pipe, contract specifications, access roads, clearing of vegetation for trenching, pole setting, type of trench by area, cuts and fills, and any other activities related to construction of the project;
- the fire plan, including a description of channels of responsibility for fire prevention and suppression, attack procedures, tools, equipment, and manpower;
- the landscape plan would show, but not be limited to (a) the display of the patterns and density reduction of the vegetation that would be used to reduce the "slot" effect that may be created by the pipeline, (b) the species and methods of revegetation, and (c) a soil erosion control display. Also, the landscape plan would show the areas of slash disposal and type of slash disposal;
- the right-of-way maintenance plan would be prepared immediately after construction. This plan would include emergency measures in case of a break.

Construction methods would be the same for all pipe sizes. Construction activities would normally be confined to a 50-foot ROW (Figures 1-3 and 1-4) along the proposed route. Only the portion of the ROW needed for construction would be cleared. Typical construction activities require clearing above-ground vegetation and obstacles from an average 35-foot width of the ROW to allow safe and efficient operation of construction equipment. Blading of the ROW would not be done unless it is absolutely necessary for the movement of machinery and equipment or the installation of pipe (for instance, it is sometimes necessary to blade in areas with steep side slopes). In some areas of rough terrain, a 50-foot ROW clearance would be the minimum necessary for safe and efficient construction. To further ensure

vehicle safety, it may be necessary to construct temporary bridges or culverts across creeks and arroyos on the working side of the ROW. The approaches may need to be cut away for installation, but would be returned as nearly as practical to the original condition. Where this method is used, materials would be obtained either from (1) the ROW, (2) transported commercial sources or, (3) adjacent lands by

the site of each pump station it would be necessary to have telephone lines for communications and electric lines for electric service, as has been depicted in Figure 1-1. Underground cables are not proposed as no significant adverse visual impacts resulting from the above-ground lines at these locations were identified.

Special Methods

Air and Water Quality

The applicant would conduct all activities associated with the project in a manner which would avoid or minimize degradation of air, land and water quality. During construction, operation, maintenance and termination of the project, the applicant would perform all activities in accordance with applicable air and water quality standards, related facility siting standards, and related plans for implementation, including but not limited to standards adopted pursuant to the Clean Air Act, as amended (42 U.S.C. 1857) and the Federal Water Pollution Control Act, as amended (33 U.S.C. 1321).

Pesticide Use

Pesticides would not be used during construction of these pipelines. An Environmental Protection Agency approved herbicide would be used, **and an individual certified as a pesticide applicator would oversee the spraying within** the fences at pump stations to prevent weed growth and around safety signs within the ROW so they remain visible.

Traffic Safety

Adequate warning signs would be positioned far enough in advance of construction zones that drivers would have sufficient warning to decelerate safely. Signs would be positioned in accordance with relevant regulations.

CONSTRUCTION WORKFORCE AND SCHEDULE

Pipelines

The 1172 miles of main and gathering pipelines would be constructed by 5 crews of about 150 workers each, working simultaneously. Each of the 5 pipeline sections would be constructed by contractors under the applicant's supervision. The teams would require about 60 percent skilled workers and 40 percent unskilled workers. It is likely that construction headquarters would be established in Albuquerque, Farmington, Grand Junction and Rock Springs (2). The towns of Hobbs and Roswell, in New Mexico; Cortez, Durango and Rangely, Colorado; Moab and Vernal, Utah; and Green River, Evanston and Kemmerer, Wyoming may also be used for services at times during the construction period. The pipeline construction schedule would depend on date of approval for beginning construction and weather conditions.

Table 1-8 indicates specific dates during which construction would be avoided due to crucial wildlife use of the areas identified by mile posts. These date spans represent the broadest time period during which crucial wildlife use would be expected according to existing data from BLM or state documents, or consultations with the area biologists. Construction would not occur during these periods unless specifically authorized by the appropriate BLM Area Manager or other Authorized Officer.

Pump Stations

Pump station construction would require 8 workers for each of the 10 sites. Construction would occur during a 90-day period for each pump station. The first 5 stations (for the 35,000 BPD) would be built within the first 18 months after the beginning of pipeline construction. The schedule for building pump stations for 65,000 BPD capacity is unknown, and will depend on the future availability of the liquids.

RESOURCE CONSIDERATIONS

The applicant would undertake a number of construction and restoration practices in addition to those already mentioned. These resource considerations are outlined below. Some apply to all land statuses, others apply only to public or FS lands, and others affect site-specific locales as defined. These practices are intended to minimize environmental impacts.

All Lands

Recreation Resources

Construction of the project may occur during the summer months when tourist and recreational use are high. The following measures

Table 1-8. CRUCIAL WILDLIFE USE AREAS AND PERIODS TO AVOID CONSTRUCTION OF PROPOSED ACTION

Approximate Mile Posts	Dates During Which Construction Would Be Avoided[a]	Reason
MAINLINE		
65 to 79	April 1 to May 31	Lesser prairie chicken booming period
418 to 420	April 1 to May 31[b]	Big game & fish - important habitat
424 to 443	December 1 to April 15[b,c]	Big game crucial winter range
459 - 467	November 15 to April 30[d]	Big game crucial winter range
566 - 568	November 1 to May 15[e]	Big game crucial winter range
586 (Kane Springs Canyon)	March 15 to June 15[e]	Crucial riparian habitat
601 to 605	March 15 to June 15[e]	Crucial wetland habitat
604 (Colorado River)	July 1 to July 31[e]	Crucial fish spawning
664 to 677	May 15 to June 20[e]	Pronghorn antelope fawning area
694 to 700	March 1 to April 30[d]	Chukar breeding grounds
697 to 705	November 15 to April 30[d]	Big game crucial winter range
785	July 1 to July 31[e]	Crucial fish habitat
788 to 800	November 15 to April 1[f]	Big game crucial winter range
800 to 804	March 15 to June 1[f]	Sage grouse strutting grounds
812 to 834	November 15 to April 1[f,k]	Big game crucial winter range
814 to 820	May 15 to July 1[k]	Deer fawning
822	September 15 to March 1[k,l]	Brown trout spawning and incubation
835 to 843	December 15 to April 1[g]	Big game crucial winter range
850 to 852	March 1 to June 15[h]	Sage grouse strutting grounds
858 to 862	March 1 to June 15[h]	Sage grouse strutting grounds
GATHERING LINES		
EAST LINE		
2 to 3	March 15 to July 1[g]	Raptor nesting area
2 to 5	March 1 to June 15[h]	Sage grouse strutting grounds
18 to 19	March 15 to July 1[g]	Raptor nesting area
17 to 20	December 15 to April 1[g]	Big game crucial winter range
74 to 77	December 15 to April 1[g]	Big game crucial winter range
WEST LINE		
17 to 18	March 15 to July 1[g]	Raptor nesting area
24 to 44	December 15 to April 1[g]	Big game crucial winter range
84 to 96	October 15 to May 15[h]	Big game crucial winter range
114 to 122 (perennial streams)	May 15 to August 15[i]	Cutthroat trout spawning area
NORTH LINE		
5 to 9	October 15 to May 15[h,j]	Big game crucial winter range
46 to 59	October 15 to May 15[h,j]	Big game crucial winter range
NORTHWEST LINE		
2 to 5	October 15 to May 15[h]	Big game crucial winter range

[a]Unless authorized by appropriate area manager.

[b]Gates, J. New Mexico Department of Game and Fish, Santa Fe, N.M.

[c]Bird, W. U.S. Bureau of Land Management, Farmington, N.M.

[d]Whitaker, A. Colorado Division of Wildlife, Denver, Colorado.

[e]Wilson, L.J. Utah Division of Wildlife Resources, Price, Utah.

[f]Smith, D.A. Utah Division of Wildlife Resources, Vernal, Utah.

[g]Dolak, J. U.S. Bureau of Land Management, Rock Springs, Wyoming.

[h]Harrison, K.E. U.S. Bureau of Land Management, Kemmerer, Wyoming.

[i]Rensel, J.A. Utah Division of Wildlife Resources, Ogden, Utah.

[j]Doughty, L.A. Bureau of Land Management, Pinedale, Wyoming.

[k]Wicks, G. Bureau of Land Management, Utah State Director, Salt Lake City, Utah.

[l]Ferguson, L.H. Bureau of Land Management, Vernal, Utah.

would be taken during the construction period to reduce impacts:

- no interference with traffic would occur at road crossings during periods of peak recreational use, namely weekends and holidays;
- temporary detours would be constructed around the construction zone where secondary access roads do not exist;
- detour routes would be established using the nearest available secondary access routes;
- construction would be scheduled so that major recreation areas, such as Flaming Gorge National Recreation Area, Ashley National Forest, or San Juan National Forest, are avoided during holidays and weekends; and
- the work force use would not conflict with tourist use of public campgrounds or forests for temporary housing. However, recreational use of these facilities would not be denied to workers.

Visual Resources

The applicant would make a concerted effort to protect the scenic values of the area of construction and the adjacent land. For example, all above-ground improvements and barricades would be nonreflective. When a safety color is not required, the color used would be chosen to blend with the natural background for that location.

Wilderness Values

(This paragraph was deleted in response to the expansion of a Wilderness Study Unit (Red Creek Badlands-Tepee Mountain, Wyoming) at the time of publication of the DEIS.)

Cultural Resources

Prior to initiating any ground disturbance, the applicant would conduct a cultural (archaeological and historical) resources inventory in accordance with BLM Class III inventory guidelines. **The inventory would be conducted on all lands including privately-owned lands for which landowner permission is granted. Actions would be taken to locate and protect cultural resources in accordance with the Memorandum of Agreement (MOA) being developed between the Bureau of Land Management, the Advisory Council on Historic Preservation, and appropriate State Historic Preservation Officers. The MOA will outline responsibilities which ensure compliance with 36 CFR 800.**

The applicant would avoid cultural resource properties located during the cultural resource inventory when prudent and feasible (as determined in consultation with the appropriate surface management agency) or as directed by the lead agency. If avoidance is not prudent or feasible, the applicant would develop and recommend a mitigation plan for site specific data recovery. The applicant would fund all protection and recovery measures undertaken. Cultural resource protection measures may include, but need not be limited to, fencing, stabilization, detailed recordation, and other physical or administrative measures.

All sites, buildings, districts and objects identified in the inventory would be evaluated as to their potential eligibility for the National Register of Historic Places. Each SHPO in consultation with BLM would be responsible for formal determination of National Register eligibility and nomination. The inventory and the evaluation would be submitted to the Authorized Officer in advance of any project-related surface disturbance. If eligible sites are located and adverse effects would occur, a site-specific report would be prepared in accordance with the Programmatic Memorandum of Agreement developed for this project.

During project construction, the applicant would employ a Project Archaeologist to monitor construction activities and inspect the areas of surface disturbance for subsurface cultural source materials. If such materials are discovered, the Project Archaeologist would report the find to the Authorized Officer, provide immediate suggestions regarding the recovery procedures to be undertaken, and leave the find intact until clearance to proceed is granted by the Authorized Officer.

All archaeologists and historians who provide inventory services, perform mitigation, prepare field reports or monitor construction activities, would meet at a minimum, professional qualifications outlined in the proposed guidelines in 36 CFR 66 (Appendix C, Professional Qualifications) and will be approved by the Authorized Officer. All inventory and data recovery work on federal and state lands would be authorized under applicable antiquities permits.

(This paragraph was deleted.)

Federal and State Lands

Public Monuments and Markers

Where the ROW includes public lands on which cadastral survey monuments and markers are located, the applicant would avoid disturbance or removal of such monuments and markers. If the removal of monuments or markers becomes necessary during specific construction activities, the applicant would advise the appropriate agency of that need. Removal and/or relocation would then be done in accordance with detailed instructions set forth by the appropriate State Director, Bureau of Land Management.

Timber Removal

In the event it becomes necessary to remove timber from the ROW lands, all saleable timber would be purchased by the applicant at the total appraised price determined by the Authorized Officer.

Site Specific

San Juan National Forest, CO (Milepost 480).

A landslide area has been identified near the proposed action in this location. The proposed route has been relocated in accordance with on-ground advice from San Juan National Forest personnel. The suggested location of the proposed route is outside the problem area and has different soil characteristics from the slide area. The relocation would enhance the security of the pipe.

Moab Canyon, UT (Milepost 607-610).

Moab Canyon has been identified as a narrow, heavily used corridor for several existing rights-of-way. As a consequence of this corridor's crowded condition, the precise location of the proposed route through the canyon would be subject to approval by the BLM Moab District Manager.

Jesse Ewing Canyon, UT (Milepost 826 to 828).

Consultations with the Vernal District Office and the Daggett County Commission have resulted in an agreement to use the existing road bed. The pipeline would be located within the road, with some minor road straightening. This would effectively avoid the adverse visual effects which would have resulted from a side hill location (see Map A-3 for revision).

Red Creek Badlands, WY (Milepost 840 to 844).

The applicant proposes to undertake special restoration practices for the 4 miles of ROW which enters the boundary of the Red Creek Badlands area presently under consideration for designation as an Area of Critical Environmental Concern (BLM, ACEC). In order to minimize the effects of erosion from surface disturbance by construction of the proposed action, the applicant would embed the disturbed area with straw or shredded bark or other recommended material, using a sheepsfoot or other appropriate methods to mitigate erosive conditions arising from construction. Construction and restoration in this area would be accomplished by practical means approved by the Rock Springs District Manager. For instance removal of vegetation would not be done unless specifically authorized, and times of construction would be limited to those enabling successful and immediate post construction restoration efforts and to seasons of dry weather.

Flaming Gorge National Recreation Area, WY (Milepost WL 10-11).

The applicant would undertake special measures immediately after construction to minimize the visual and erosion impact of the pipeline clearing. The right-of-way would be

Table 1-9. IDENTIFIED ALTERNATIVES TO THE PROPOSED ACTION

Alternative Routes

1. Follow existing Northwest Pipeline through Arches National Park.

2. Skirt the west and north boundaries of Arches National Park via the shortest possible route.

[a]3. Follow existing Northwest Pipeline over Douglas Pass.

4. Go east of Dinosaur National Monument in Colorado then back into Utah using a route near Cottonwood Mountain.

5. Go east of Dinosaur National Monument in Colorado then head north into Wyoming using a route near Highway 430.

6. Go west of Dinosaur National Monument in Utah then head north to Wyoming using Willow Creek.

7. Follow existing Northwest Pipeline all the way from west of Dinosaur National Monument across Flaming Gorge Reservoir in the National Recreation Area, Ashley Forest, into southwestern Wyoming. This route would depart from the proposed action at Diamond Mountain (MP 801), cross Green River at Little Hole, and head to Dutch John before crossing the reservoir.

[a]8. Follow existing Northwest Pipeline to Little Hole then head north over Goslin Mountain, Little Mountain, and east of Sheep Mountain.

9. Follow existing Northwest Pipeline to Little Hole then head north over Goslin Mountain, through Richard's Gap to east of Little Mountain. This route would then follow Highway 373 north.

[a]10. Follow the proposed route through Rye Grass and Jesse Ewing canyons. Depart the proposed route at the north end of Jesse Ewing Canyon heading northeast near Clay Basin Creek and over Pine Mountain to Titsworth Gap.

11. **Follow an existing pipeline through the town of Green River, Wyoming. This route would depart from the proposed action north of the Rock Springs pump station (MP-869), continue north along Highway 373 to a point just southwest of Rock Springs where it would head west (parallel to Highway 30) through the town of Green River, and rejoin the proposed route at MP-WL21.**

Other Alternatives

12. Build local facilities for storage and later disposition of the liquid hydrocarbons, or for reinjection into the natural gas stream.

13. Build local fractionating facilities to decompose the liquid hydrocarbons for distribution elsewhere.

14. Transport the mixed stream to destinations other than Hobbs Station, Texas. This action implies the possible construction of one or more pipelines.

15. Transport the liquid hydrocarbons by other transportation modes (i.e., trucks and/or railroads).

16. Construct a pipeline to Hobbs Station by routes not herein evaluated, for instance, heading east to Cheyenne then heading south along highways in the Front Range of Colorado and New Mexico to Hobbs Station.

17. Partial implementation of the proposed action.

[a]18. Take no action. No action is defined as BLM's not issuing the grant to MAPCO to construct and operate its proposed action.

[a]19. Delay the project. This action is defined as BLM's not issuing the grant to MAPCO to construct their proposed action in 1980.

[a]Selected for detailed analysis.

Table 1-10. SUMMARY OF SCREENING DECISIONS FOR ALTERNATIVES

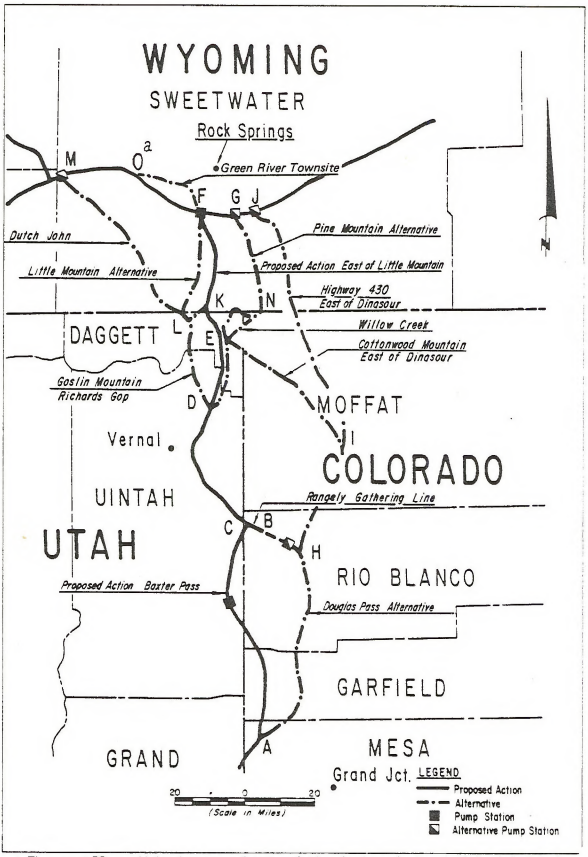
ALTERNATIVES	CRITERIA FOR SCREENING FROM DETAILED ANALYSIS 1[a]	2	3
1. Through Arches N.P. (UT)		X	
2. Skirt Arches N.P. (UT)			X
[b] 3. Douglas Pass (CO)			
East of Dinosaur N.M. (CO)			
4. Cottonwood Mountain (UT)			X
5. Highway 430 (CO)			X
West of Dinosaur N.M.			
6. Willow Creek (UT)			X
Little Hole			
7. Dutch John (across Flaming Gorge Reservoir) (WY)			X
[b] 8. Little Mountain (UT,WY)			
9. Goslin Mountain Richard's Gap (UT,WY)			X
[b] 10. Pine Mountain (UT,WY)			
11. Green River Townsite			X
12. Building of local storage facilities for later disposition.	X		
13. Building of local fractionation facilities to decompose the products for distribution elsewhere.	X		
14. Transport the mixed stream to destinations other than Hobbs Station, Texas (construction of one or more pipelines).	X		
15. Transport products by other modes (i.e., trucks and/or railroad).	X		
16. Construct pipeline to Hobbs Station by routes not herein evaluated.	X		
17. Partial implementation.	X		
[b] 18. No Action			
[b] 19. Delay of Project			

X = Screened from further consideration and detailed analysis.

[a] KEY

1. The alternative does not provide a reasonable alternative to the proposed action.
2. The alternative does not provide a route which would clearly not conflict with nationally recognized single use purposes, such as a National Park or National Monument.
3. The alternative does not provide a route which is clearly better than the proposed action in terms of fewer adverse environmental impacts.

[b] Selected for detailed analysis.



a The segment FO was added to the map to reflect the evaluation of and screening from detailed analysis of the Green River Townsite alternative, based on criterion three.

Map 1-4. ALTERNATIVE ROUTES CONSIDERED UNDER SCREENING CRITERION THREE, TRI-STATE AREA

evident with the existing line. In addition, the crossing of the reservoir would present technical and construction problems and involve additional length.

Green River Townsite, Wy (Town and Bridge)

Both of these alternatives were originally considered because they more closely follow an existing pipeline route. These alternatives were eliminated from detailed analysis as a result of identification of numerous conflicts:

- **Both alternatives would be longer than the Davis Bottoms route.**
- **Both alternatives would result in visual impacts which would be clearly visible from the town of Green River.**
- **Both alternatives would traverse either existing residential areas or areas presently under development. Should future development continue as expected, location of the pipeline along either of these alternatives would result in conflicts with townsite zoning and planning.**
- **The bridge alternative would be in direct conflict with a privately owned and operated recreation site located along the Green River.**

ROUTE ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

Three route segments emerged from the screening process as reasonable alternatives to the proposed action. Analysis of impacts for the three segments was conducted at the same level of detail as for the proposed action.

Locations

Maps 1-5 and 1-6 indicate the general locations of the alternatives, while Maps 12, 13, and 14 in Appendix A identify specific locales.

One alternative was selected as an optional route to the 74-mile Baxter Pass (AC) segment (Map 1-6) of the proposed action.

Douglas Pass, CO

This 72-mile segment (AB) departs the proposed route at MP 688 and rejoins it at MP 6 of the Rangely Gathering Line. Its specific location is depicted on Maps 12 and 13 in Appendix A. Selection of this alternative would require relocating one pump station location from the Dragon (UT) site to a site near Rangely (CO) in Rio Blanco County (Section 28, Township 1S, Range 101W. See Map 13 of Appendix A). If this pump station location is selected, the power source would be 1/10 miles from the site. Size of the KV line would be 14.4 KV, and 3 power poles are estimated to be required. The telephone line source would be one-half mile from the site. This is in lieu of microwave station required for the Dragon Pump Station for the Baxter Pass Alternative .

Two routes were selected as alternatives to the proposed action beginning at Diamond Mountain (D). The proposed action segment is Rye Grass - Jesse Ewing to Clay Basin to East of Little Mountain (DEF on Map 1-6, 63 miles).

Little Mountain, UT, WY

This alternative (DF) departs the proposed route at MP 800, proceeds to Little Hole, **in the Flaming Gorge National Recreation Area (administered by the Ashley National Forest) crosses Goslin Mountain in Ashley National Forest,** goes north over Little Mountain and rejoins the proposed action at MP 863 (56 miles). Its specific location is depicted on Map 14 in Appendix A.

Pine Mountain, UT, WY

This 68-mile route (DEG) follows the proposed action through Rye Grass and Jesse Ewing Canyons from MP 800 to MP 828, where it departs the proposed action in a north easterly direction to and over Pine Mountain. It rejoins the proposed action at MP 7 of the East Gathering Line. Selection of this route would require moving the Rock Springs Pump Station from its proposed location near Highway 373 to a site near South Baxter (Section 16, Township 16, Range 104W in Sweetwater County, Wyoming). The specific location of this alternative is depicted on Map

14 in Appendix A. If this alternative were to be selected, the power source is 5 miles away and would require a 14.4 KV line and 89 power poles. The communication source for the buried telephone line would be 5 miles away.

Special Construction Practices for Alternative Routes

If any of the alternative routes is ultimately selected, the applicant would undertake construction and operation with the same practices and procedures as specified under the proposed action section earlier in this chapter. Table 1-11 specifies the dates construction would be avoided to reduce potential impacts to wildlife resources for each alternative.

OTHER ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

Two additional alternatives were analyzed in detail. They are the "no action" alternative, which is defined as BLM denial of permit to the applicant for construction and operation of the proposed action, and "delay of project." Delay of project is defined as BLM's not issuing to MAPCO the grant to construct the proposed action in 1980.

Summary

Findings from the analyses of impacts are summarized from Chapter Three and the background files at BLM, NMSO in Table 1-12.

Table 1-11. CRUCIAL WILDLIFE USE AREAS AND PERIODS TO AVOID CONSTRUCTION FOR ALTERNATIVES

Approximate Mile Posts	Dates During Which Construction[a] Would Be Avoided	Reason
DOUGLAS PASS, CO (AB)		
12 to 14	March 1 to April 30[b]	Chukar breeding complex
15 to 24	November 15 to April 30[b]	Big game crucial winter range
32 to 34	November 15 to May 31[b,g]	Big game crucial winter range and migration
40 to 49	November 15 to April 30[b]	Big game crucial winter range
41 to 43	May 1 to May 31[g]	Big game migration
LITTLE MOUNTAIN, UT, WY (DF)		
0 to 4	March 15 to June 1[c]	Sage grouse strutting grounds
11 to 22	November 15 to April 1[c]	Big game crucial winter range
22	September 15 to March 1[d]	Brown trout spawning and incubation
29 to 49	December 15 to April 1[e]	Big game crucial winter range
50 to 54	March 1 to June 15[e]	Sage grouse strutting grounds
PINE MOUNTAIN, UT, WY (DEG)		
0 to 4	March 15 to June 1[c]	Sage grouse strutting grounds
12 to 42	November 15 to April 1[c]	Big game crucial winter range
14 to 20	May 15 to July 1[f]	Deer fawning
22	September 15 to March 1[d]	Brown trout spawning and incubation
30 to 42	November 15 to April 1[c,e]	Big game crucial winter range
46 to 49	December 15 to April 1[e]	Big game crucial winter range

[a]Unless authorized by appropriate Area Manager.

[b]Whitaker, A. Colorado Division of Wildlife, Denver, Colorado.

[c]Smith, D.A. Utah Division of Wildlife Resources, Vernal, Utah.

[d]Ferguson, L.H. U.S. Bureau of Land Management, Vernal, Utah.

[e]Haverly, S.J. U.S. Bureau of Land Management, Rock Springs, Wyoming.

[f]Wicks, G. BLM Utah State Director, Salt Lake City, Utah.

[g]Hoover, R. Colorado Division of Wildlife Denver, Colorado.

Table 1-12. SUMMARY OF SIGNIFICANT IMPACTS FOR PROPOSED ACTION AND ALTERNATIVES

Impact Topics	Proposed Action				Alternative Segments					No Action	Delay of Project
					Comparison One		Comparison Two				
	Mainline	Gathering Lines	Pump Stations	Operation	AB CO	AC[a] CO	DEF[a]	DF	DEG		
							All in UT, WY				
Climate	0	0	0	0	0	0	0	0	0	0	0
Air Quality	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Geologic Hazards	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Paleontology	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	0	(?)
Soils	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Water Resources	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Vegetation	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Wildlife	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Cultural	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	0	(?)
Visual	(-)	(-)	NS	NS	(-)	(-)	(-)	(-)	(-)	0	(-)
Noise	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Recreation	NS	NS	NS	0	NS	NS	NS	NS	NS	0	NS
Wilderness	0	0	0	0	0	0	0	0	0	0	0
Livestock Grazing	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Agriculture	NS	NS	0	NS	NS	NS	NS	NS	NS	0	NS
Land Use Controls and Constraints	0	(-)	0	0	0	0	0	(-)	0	0	0
Transportation Networks	NS	NS	NS	0	NS	NS	NS	NS	NS	0	NS
Social and Economic Conditions	(?)	(?)	NS	(+)	NS	NS	NS	NS	NS	(-)	(-)
100-Year Floodplains	NS	NS	NS	NS	NS	NS	NS	NS	NS	0	NS
Threatened or Endangered Species	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	(?)	0	(?)
Wild Horses	NS	NS	NS	NS	0	0	NS	0	NS	0	NS
Prime and Unique Farmland	NS	NS	0	NS	NS	NS	NS	NS	NS	0	NS
Energy Use	NS	NS	NS	(+)	NS	NS	NS	NS	NS	(-)	NS

[a]Proposed Action Key: (-) significant adverse impact, (NS) no significant impact, (+) significant beneficial impact, (?) = unknown significance, (0)=no impact.

MITIGATION NOT OTHERWISE INCLUDED IN THE PROPOSED ACTION

Mitigating measures were identified through impact analysis. Many of these were incorporated by the applicant in Chapter One as special construction practices or resource protection methods which would be implemented to help minimize adverse impacts. The following mitigating measures **would be incorporated as stipulations in the ROW grant.**

Paleontology

Prior to construction, **necessary surveys would be conducted on public lands. Areas of public lands within the ROW containing fossils of exceptional scientific value would be avoided or mitigated.**

Soils

Erecting vehicle barriers **would** be required along the ROW in areas where **necessary** to facilitate reclamation.

Wildlife

1. In order to avoid the potential impact of opening new access into crucial wildlife areas such as Rye-Grass Draw **(MP 818-820),** the Authorized Officer **would** require the construction of vehicle barriers where deemed necessary.

2. Mitigation of adverse impacts to riparian habitat and aquatic life at stream crossings **would** be required on a case-by-case basis by the Authorized Officer. Such measures **would** include: (a) special revegetative measures on the stream bank for bank stabilization and habitat restoration; (b) diversion of flows around the construction area; (c) setting the construction staging areas away from the stream bank; (d) minimizing the use of heavy equipment in the stream bed; or (e) seasonal restrictions during crucial spawning periods.

3. **In areas where necessary, revegetation of the ROW with plant species that are beneficial to wildlife in the area would be required to minimize the effect of removing valuable summer or winter forage.**

Visual Resources

If necessary to reduce visual contrasts, replacement of large rocks and boulders in the ROW would be required to help minimize visual contrasts, for instance, in areas within narrow canyons, such as Kane Springs, Utah, and Moab Canyon, Utah.

Table 2-1 FORMATIONS AND NUMBER OF MILES ALONG THE PROPOSED ACTION HAVING POTENTIAL PALEONTOLOGICAL RESOURCES

Formation	Miles
Dockum; Chinle	3
Morrison	28
Kirtland Shale; Fruitland	8
Animas	8
Nacimiento, Ojo Alamo	86
San Jose	19
Cutler	6
Wasatch	131
Green River	73
Uinta	11
Bridger	63
Total	436

list even though they do not have legal protection under the Act. Their inclusion recognizes that they may be listed at any time and if not considered, they would represent a potential source of future delays or modifications to the proposed action. In light of this, a biological assessment will also be conducted on those species proposed for federal listing.

The biological assessment will be completed within 180 days after receipt of the species list, unless it is mutually agreed to extend this period. The biological assessment should include 1) the results of a comprehensive information survey, 2) results of any studies undertaken to determine the nature and extent of any impacts on identified species, 3) consideration of the cumulative effects upon the species or its critical habitat, 4) study methods used, 5) difficulties encountered in obtaining data and completing the proposed study, 6) conclusions including recommendations as to further studies, and 7) any other relevant information. In essence, the biological assessment is synonymous to the impact analysis conducted on any other resource which may be impacted by the proposed action. If the findings of the biological assessments indicate that a listed species may be affected by the proposed action, the BLM is required to formally request consultation with the FWS.

The list has been requested and received (November 16, 1979) for the proposed action. The FWS list response and further investigations indicate the possible occurrence of the species listed in Table 2-2.

It is BLM policy that only state-listed and legislatively protected Threatened and Endangered species categories be given consideration equal to federal-listed Threatened and Endangered species. These state-listed species are provided in Table 2-3. Utah and Wyoming do not have lists in this status. Furthermore, the species on the lists for Colorado and Texas do not coincide with areas affected by the proposed action.

Cultural Resources

About 341 recorded sites are known to exist within the 20-mile wide study corridor. This number reflects known sites rather than the actual density of prehistoric and historic occupation of the area. Of these known sites, 43 are in or known to be eligible for inclusion in the National Register of Historic Places, as given in Table 2-4.

A BLM Class III Inventory is being conducted along the proposed route on all lands, including privately-owned lands for which land owner permission is granted. The inventory will locate all surface sites within the proposed 50-foot ROW, as well as provide locations where subsurface sites may be encountered.

At the present time (6/80) the inventory has been completed along one half of the proposed route, resulting in the location of 120 sites. Most of these sites are lithic procurement areas or scatters of lithic and ceramic materials. The Overland Trail is crossed at about MP 25 on the West Leg. Avoidance of all sites would be undertaken when feasible, as discussed in Chapter One. The inventory would be completed prior to construction in accordance with the Memorandum of Agreement developed for the project by the Bureau of Land Management, the Advisory Council on Historic Preservation, and appropriate State Historic Preservation Officers.

Inventory results indicate sensitive areas are located in southwestern Colorado in the Anasazi culture area and in the sand-dune areas in western Wyoming.

Major prehistoric and historic periods which may be represented in the study corridor are listed below and described in the following discussion.

Prehistoric
- Paleoindian: 11,000 - 6000 B.C.
- Archaic: 6000 B.C. - A.D. 450
- Formative: A.D. 450 - 1450
  - Southwest
  - Great Basin
  - Plains/Plateau
- Shoshonean - Athabascan Period: A.D. 1300 - Present

Historic
- Spanish Exploration and Settlement
- Fur Trade
- Westward Migration
- Settlement and Development

Paleoindian Period (11,000-6000 B.C.)

The Paleoindian Period, dating from late glacial and early post-glacial times, was predominantly a hunting stage exploiting large migratory herbivores. These hunters also utilized and exploited available vegetal resources. Social structure probably consisted of the nuclear family organized into highly mobile nomadic bands.

Table 2-2. FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES FOR PROPOSED ACTION AND ALTERNATIVES

Species		States			
	Status[a]	New Mexico	Colorado	Utah	Wyoming
WILDLIFE					
Black-footed ferret	E	X	X	X	X
Bald eagle	E	X	X	X	X
Peregrine falcon	E	X	X	X	X
Whooping crane	E	X	X	X	X
Colorado squawfish	E	X	X	X	
Humpback chub	E		X	X	X
Razorback sucker[b]	P	X	X	X	
Pecos gambusia[c]	E	X			
Bonytail chub[d]	**E**		**X**	**X**	**X**
PLANTS					
Sclerocactus mesae-verdae	T	X	X		
Echinocereus kuenzleri	E	X			
Pediocactus knowltonii	E	X	X		
Sclerocactus glaucus	T		X	X	

[a]E = Endangered, P = Proposed and T = Threatened

[b]**The razorback sucker was dropped from the proposed list on April 23, 1980 (45 FR 27710; 4/23/80).**

[c]**The Pecos gambusia did not appear on the FWS November 16, 1979 list response. Its known occurrence 20 miles south of the proposed route necessitates its inclusion for impact analysis.**

[d]**The bonytail chub did not appear on the FWS November 16, 1979 list response. Its known occurrence in rivers crossed by the proposed route necessitates its inclusion for impact analysis. The bonytail chub was officially listed as endangered on April 23, 1980 (45 FR 27710; 4/23/80).**

Table 2-4. SITES IN OR ELIGIBLE FOR INCLUSION IN THE NATIONAL REGISTER[a] WITHIN TEN MILES OF PROPOSED ACTION

Name of Site (State or Federal Number)	Location	Approximate Distance from Proposed Route	County
NEW MEXICO			
Aztec Ruins National Monument (PH0092142)	1 mi. N of Aztec	5 mi. W of MP 427	San Juan
Salmon Ruin (PH0092169G)	9 mi. E of Farmington	6 mi. W of MP 415	San Juan
Jemez Pueblo	28 mi. N of Bernalillo on NM 4	6.5 mi. NE of MP 302	Sandoval
Zia Pueblo	18 mi. W of Bernalillo	1 mi. NE of MP 297	Sandoval
Tamaya (Santa Ana Pueblo)	N of Bernalillo	1 mi. NE of MP 288	Sandoval
Kuana Ruin	N of Bernalillo off NM 44	near MP 285	Sandoval
Our Lady of Sorrows Church	U.S. 85, Bernalillo	4 mi. SW of MP 280	Sandoval
Sandia Cave	11 mi. E of Bernalillo in Cibola National Forest	4 mi. SW of MP 270	Sandoval
COLORADO[a,b]			
Collage Shelter[c] 52/05/0002	W side of Missouri Creek at West End Canyon	3 mi. E of MP 722	Rio Blanco
Whiskey Creek Trestle[h]	25 mi. SW of Rangely near junction of Whiskey and Evacuation Creeks	.5 mi. SW of MP 723	Rio Blanco
Sacred Mountain District[c]	NW of Cortez	SW of MP 490-530: 1 mi. SW of MP 524, 2 mi. SW of MP 497	Dolores and Montezuma
Lowry Ruin NHL[d] PH0087335	9 mi. W of Pleasant View	8 mi. SW of MP 520	Montezuma
Piggre Site[c]	5 mi. W of Pleasant View	6 mi. SW of MP 520	Montezuma
Hovenweep National Monument: Goodman Point PH0049221	NW of Cortez	9 mi. SW of MP 508	Montezuma
Escalante Ruin	2 mi. W of Dolores	.5 mi. NE of MP 503	Montezuma

[a]Federal Register, V. 44, N.26, February 6, 1979.

[b]Colorado Historical Society, "Colorado Inventory of Historic Sites", September 14, 1979.

[c]Pending nomination to National Register.

[d]NHL: National Historic Landmark.

[e]Utah Division of State History, "Antiquities Site Inventory", September 1979.

[f]Wyoming Recreation Commission," Wyoming Historic Preservation Plan", as amended August 24, 1979.

[g]Eligible for inclusion in the National Register.

[h]Since publication of the DEIS, this site has been included in the National Register.

both lookout and domestic functions. There is an emphasis upon storage facilities at most Fremont sites. Fremont ceramic assemblages are identifiable in that they are tempered with crushed rock and are predominantly a plain, sometimes polished, gray ware fired in a reducing atmosphere. Pictographs and petroglyphs are common in the Fremont culture area. Zoomorphic, anthropo-morphic, and geometric designs are present, and are often stylized. The Fremont peoples seem to have abandoned this area sometime around 1200 A.D.

Plains/Plateau

In the Plains/Plateau culture area, agriculture does not seem to be evident. There is a continuum of projectile point types and, except for the occurrence of pottery and some soapstone bowls, the subsistence system does not appear to change drastically from the Archaic Period. There is a shift from the use of the atlatl dart to the use of the bow and arrow. In some parts of the area tipi rings (stone circles) are associated with pottery and small points. There is evidence from some sites that group hunting may be associated with pronghorn antelope and bison remains during this period.

Athabascan-Shoshonean Period (1300 A.D. - Present)

Little archaeological documentation exists for the prehistoric occupation of the proposed project area after the Formative Period because of the nomadic traits of the peoples. The Navajos and Utes were known to have occupied the Southwest area. The Shoshonean tribes were the major tribes that utilized the Plains/Plateau area. Sites most likely to be encountered are surface sites such as slight depressions encircled with rocks (wickiup sites) and open camps. In areas where limited agriculture was practiced, adobe structures may be found. Timber lodges may have been used by the Shoshone and other Plains/Plateau tribes. Separate discussions are presented below for each of these cultural groups.

Navajo Tradition (A.D. 1550-1775)

The Navajos and their Athabascan-speaking relatives, the Apaches, arrived in the area about A.D. 1500. The bulk of data for the Navajo Tradition Period is from northwestern New Mexico in the Upper San Juan, Gobernador, Largo, Big Bead Mesa, and Chaco localities. The possibility of encountering historic Navajo sites in the La Plata drainage is enhanced near the pipeline route, where Navajos are recorded to have lived with the Utes in the late 1800s.

Ute Tradition (circa A.D. 1600-Present)

The proposed pipeline route passes through the present Southern Ute Indian Reservation just east of the boundary with the Ute Mountain Ute Indian Reservation to the west. Although the date the Utes entered the Southwest is not known, it probably postdates Anasazi abandonment of the area. The earliest historic period reference to the Southern Utes was made by the Spanish in 1626. Early Ute sites may well be encountered along the pipeline right-of-way. Little is known at present about the archaeology of early Ute campsites and other activity areas.

Shoshone (A.D. 1300 - Present)

The Shoshone were the major tribe within the Plains/Plateau area. Other tribes, such as the Gros Ventre, Comanche, Crow, Flathead, Arapahoe, Cheyenne, and Sioux, frequented the vicinity of the project for hunting, raiding, or trade. Subsistence was a mixed base, utilizing seasonally available resources and hunting of large game. After the introduction of the horse, the pattern of life changed to an equestrian, bison-hunting orientation.

Spanish Exploration and Settlement

Numerous Spanish expeditions traversed the study corridor including Coronado's in 1540. Juan de Rivera led the first expedition into San Juan country between 1761 and 1765. The Franciscan friars, Escalante and Dominguez, traveled along the San Juan, Dolores, and White rivers in Colorado, reaching Utah Lake in 1776.

Fur Trade

The first Europeans to settle in the Great Basin were fur trappers who worked the Three Corners region of Wyoming, Colorado, and Utah in the early nineteenth century, especially in the long valley of the Green River. Brown's Hole was named after the French trapper Baptiste Brown. Between 1812 and 1840, the

specific site is available at BLM offices. A summary of the number of miles per VRM class and the VRM class at pump station locations is shown in Table 2-5.

The profiles indicate areas that have not been fully inventoried or evaluated using the VRM system. These areas have been assigned a tentative VRM class by BLM pending formal evaluation unless otherwise noted. Baseline data for Forest Service lands, supplied by the Forest Service has been assigned a comparable BLM VRM class. The FS has a landscape management program similar to the VRM system with 5 primary visual management classes and 2 short-term classes.

Wilderness Resources

Location of the proposed action in relation to BLM Wilderness Study Areas and FS RARE II areas was evaluated. **The proposed action crosses a wilderness inventory unit boundary. This is the Red Creek Badlands-Tepee Mountain WSU in Wyoming. The boundary of the unit was expanded at the time of DEIS printing. Consequently, the proposed action would cross this unit for about 1 mile. In every other case there is an existing road between the boundary and the proposed action. Eleven study units are within 2 miles of the proposed action and are listed in Table 2-6.**

Prime and Unique Farmlands

A Council on Environmental Quality memorandum, dated 30 August, 1976, seeks to ensure that Prime and Unique Farmlands are not irreversibly converted to other uses as a result of federal actions and that the viability of these lands not be diminished. It is the policy of the Soil Conservation Service (SCS) to make and keep current an inventory of the Prime and Unique Farmlands.

Twenty-five counties in 5 states are traversed by the proposed action. Of these, Important Farmland maps are available (as of 17 January, 1980) for only 5 counties. All appropriate state and local SCS offices were contacted to request additional information. The response varied considerably along the route due mainly to the initial stages of progress in identifying and mapping Important Farmlands. Identification of such lands by the SCS has just begun in some counties while in others the mapping is well under way. The location of all known Prime and Unique Farmlands was provided; however, the location and extent of State and Locally Important Farmlands was not always known.

Mainline

Throughout much of the region traversed by the proposed route, prime farmland occurs only where irrigation is used. Along the 863 mile proposed route, an estimated maximum of 18.3 miles (111 acres) of Prime, no Unique, 47.4 miles (287 acres) of Statewide Important, 9.1 miles (55 acres) of Locally Important, and 11.4 miles (69 acres) of Other Farmlands would be traversed by the proposed route.

Gathering Lines

An estimated 2,000 acres of Prime Farmland and no Unique Farmland occurs in the southwestern Wyoming region (BLM 1978). County maps of such farmlands are not available. Local SCS offices indicated that no Prime and Unique Farmlands would be traversed by the proposed action (Lewis 1979; Millsap 1979; Erickson 1980).

Land Use Controls and Constraints

The proposal would cross areas under the jurisdiction of numerous planning authorities. These range from states, through Statewide Comprehensive Plans for various resources, to local special-purpose districts. Additionally, numerous federal plans exist, including plans developed for BLM and FS lands.

Table 2-7 indicates the status of the BLM planning process in Districts affected by the proposed action. The Management Framework Plan (MFP) represents the final stage of planning decisions, although even these decisions are subject to change through public discussion and new information. Approved Forest Service plans exist for Ashley National Forest and Flaming Gorge National Recreation Area, **which was established by PL-90-540. An existing Management Plan and Final EIS affirms the primary purposes as recreational and scenic.**

The National Park Service has proposed a segment of the Green River for inclusion into the Wild and Scenic River System. Currently, a study is being prepared for transmittal to the Office of Management and Budget for eventual release to Congress and the public. This document may recommend inclusion of the river

Table 2-6 WILDERNESS AREAS FOR INTENSIVE INVENTORY WITHIN TWO MILES OF THE PROPOSED ACTION

BLM#	Name of Area	County/State	Acreage	Milepost	Distance & Direction	Existing Use
NM-010-022	Cabezon	Sandoval, NM	8,320	317	2.0W	Grazing
CO-030-251	Meneffe Mountain	Montezuma, CO	7,360	483	0.5S	Grazing, oil & gas leases
UT-060-139	Mill Creek	San Juan & Grand, UT	18,200	88-598	1.0E	Grazing, mineral exploration, recreation
UT-060-140	Behind the Rocks	Grand, UT	18,500	590-600	0.2W	" "
UT-060-138	Negro Bill Canyon	Grand, UT	8,406	600-603	1.0E	" "
UT-060-089	Gold Bar Canyon	Grand, UT	22,100	600-608	0.1W	" "
CO-070-001	Prairie Canyon	Garfield, CO	10,200	695-705	2.0W	Grazing
CO-070-009	**Demaree Canyon**	**Garfield, CO**	**29,890**	**697-700**	**0.1E**	**Grazing, oil and gas leases**
WY-040-406 WY-040-407 WY-040-410	**Red Creek Badlands-Tepee Mountain**	**Sweetwater, WY**	**31,622**	**834-845**	**0.0W**	**Grazing, hunting**

segment crossed as Scenic. The proposed action would cross this segment at MP 822.

The Moab District of the BLM has expressed concern about tight access through Moab Canyon. This narrow canyon is the only viable north-south corridor through eastern Utah.

The Flaming Gorge National Recreation Area (NRA) was established by congress for special management to provide for:

- **Public outdoor recreation benefits**
- **Conservation of scenic, scientific, historic, and other values contributing to public enjoyment**
- **Such management, utilization, and disposal of natural resources as in his (Secretary of Agriculture's) judgement will promote or are compatible with and do not significantly impair the purpose for which this National Recreation Area was established.**

Based on PL-90-540, the Ashley National Forest developed a Management Plan and FEIS. This plan states that "conflicts between recreational or scenic values will be resolved in favor of the former."

Social and Economic Conditions

The potential for significant impacts from the proposed action was examined for jurisdictions and residents associated with the proposal. Jurisdictions with potential involvement were: (1) counties through which the route passes, (2) towns within five miles of the route, and (3) towns whose services during construction may be solicited. Suppliers and operators of the gas processing plants were also considered. Data were collected and analyzed for the topics of population trends, employment conditions, indicators of economic well being, temporary housing availability, physical proximity, and fiscal status. Data and analyses for which no significant impacts were found are on file at the NMSO, BLM.

Two topics with potential for significant socioeconomic impacts are short-term demand for temporary housing and benefit to suppliers and operators of gas processing plants due to increased efficiency of operations and sale and use of the natural gas liquids.

Housing Availability

Thirteen areas were identified as most likely to be affected in terms of increasing housing demand associated with construction of the proposed action. These were Hobbs, Roswell, Albuquerque, Farmington, the Cortez-Durango area, Moab, Grand Junction, Rangely, Vernal, Rock Springs, Green River, Evanston, and Kemmerer. Of these, Hobbs, Moab, Green River, Evanston, and Kemmerer have an especially short supply of temporary housing.

Hobbs, NM

Due to intense energy development, Hobbs has become the second fastest growing area in New Mexico since 1973. The housing market is very tight, with the vacancy rate around one to two percent.

Moab, UT

Moab has a very tight market in conventional housing; however, the area has 16 motels with a total of 503 units (Maple, 1980) to accommodate tourists, primarily during the period between early May to late August. During this peak season of tourist use, the vacancy rate is generally 0-5 percent. However, during 1979 operators experienced a poor season due to fuel uncertainties and high costs. Business was down by as much as one-half at times at the 2 largest motels. Managers of these 2 facilities expect a similar season for 1980 (Marks, 1980; Mauzey, 1980).

In addition to motel units, Moab has 10 trailer parks at which there are some mobile home spaces available for hookups. There is also a private campground near Moab.

Green River, WY

The housing market is extremely tight due to intense energy development and land use constraints. Much construction has been proposed, but there is limited building space and no areas zoned for mobile homes in the city or toward Rock Springs.

Evanston, WY

Energy development projects in the area have created a heavy demand for temporary housing in Evanston. Peak demand for housing units is essentially year-around. The hotel-motel vacancy rate is estimated at under 2 percent (10 units). The situation with apartments is similar and mobile home and Recreation Vehicle hookups are fully occupied.

Kemmerer, WY

Vacancy rates in the area are effectively 0 percent. Energy development and mining industry workers account for most of the year-around high demand for temporary housing.

ALTERNATIVES

Discussion of the affected environment for the alternatives is not repeated if it is consistent with that for the proposed action.

All Alternatives (AB, DF, DEG)

Paleontology

Table 2-8 lists the total number of miles of formations along the alternatives having potential paleontological resources.

Cultural Resources

All alternatives lie within the cultural areas described for the proposed action; however, the number of known sites differs as presented in Table 2-9.

Visual Resources

The milepost locations of VRM classes for the alternative routes are shown in elevation profiles in Figure 2-3. The number of miles and pump stations per VRM class is shown in Table 2-10.

Douglas Pass Alternative (AB)

Prime and Unique Farmlands

This alternative would traverse an estimated six acres of Prime, no Unique, 14 acres of Statewide Importance, no Locally Important, and nine acres of Other Farmland (SCS 1979a, 1979b, 1979c).

Wilderness Resources

This alternative would be located 0.1 miles east of the Demaree Canyon WSA (CO-070-009).

Existing use is grazing, and oil and gas leases in the 29,890 acre area.

Little Mountain Alternative (DF)

Prime and Unique Farmlands

This alternative would go through an estimated 18 acres of Statewide Important Farmland but no known areas of Prime, Unique, Locally Important, or other Farmland (Erickson 1980; Millsap 1979).

Land Use Controls and Constraints

This alternative would cross the same segment of the Green River that is proposed for inclusion in the Wild and Scenic River System at MP DF 21. **This alternative would cross the Little Hole Recreation Complex and Little Hole National Recreation Trailhead in the Flaming Gorge NRA. The National Forest is developing plans for significant expansion of the existing facilities at this site. The approved Management Plan for this portion of the Flaming Gorge NRA is restrictive of developments not included in the Plan.**

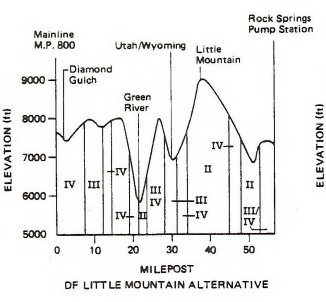
Pine Mountain Alternative (DEG)

Prime and Unique Farmlands

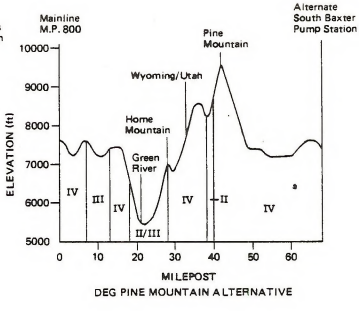
Approximately 12 acres of Statewide Important Farmland would be traversed by this alternative; however, no known areas of Prime, Unique, Locally Important or Other Farmland would be crossed (Erickson 1980; Millsap 1979; Robinson 1979).

Land Use Controls and Constraints

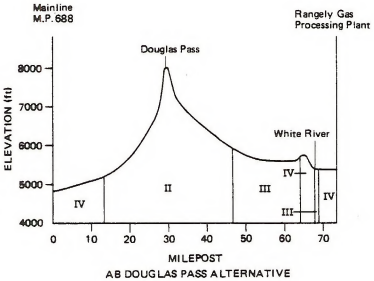
This alternative crosses the Proposed Wild and Scenic River segment of the Green River at MP DEG 22.



DF LITTLE MOUNTAIN ALTERNATIVE



DEG PINE MOUNTAIN ALTERNATIVE



AB DOUGLAS PASS ALTERNATIVE

LEGEND:

I, II, III, IV, V — Visual Resource Management Classes

SOURCES:

BLM — Colorado State Office, Utah State Office,
Wyoming State Office,
Southwest Wyoming Coal- Final EIS
Forest Service

a Since publication of the DEIS baseline data has been changed in this area by the BLM Rock Springs District.

Figure 2-3. VISUAL RESOURCE MANAGEMENT CLASSES ALONG ALTERNATIVE ROUTES

Table 2-10. DISTRIBUTION OF VRM CLASSES BY MILES OR LOCATION FOR ALTERNATIVES

Alternative	VRM Class				
	I	II	III	IV	V
Douglas Pass					
CO	0	34	18	20	0
Little Mountain					
UT	0	2.5	10.5	17	0
WY	0	16	3	7	0
Pine Mountain					
UT	0	6	9	21	0
CO	0	0	0	2	0
WY	0	3	0	27	0

Table 3-1. ENVIRONMENTAL RESOURCES AND IMPACT TOPICS ANALYZED

Climate

Air Quality
1. fugitive dust from construction
2. emissions from pump stations
3. non-attainment areas

Geologic Hazards
1. subsidence
2. landsliding
3. fault rupture
4. volcanic eruption
5. radioactivity

Paleontology
1. areas of known potential for scientific fossils
2. areas of high potential for exceptional scientific fossils

Soils
1. soil erodibility by type
2. soil loss
3. slope, erosion control
4. reclamation measures

Water Resources
1. construction impacts on water quality (suspended sediment)
2. operation impact on water quality (spills)
3. floodplains
4. relationship to other planned water resource developments
5. consistency with 208 water quality management plans

Vegetation
1. vegetative types
2. amount of surface disturbance
3. production losses
4. revegetation measures
5. riparian vegetation
6. compliance with Endangered Species Act, Section 7.

Wildlife
1. game/non-game species
2. crucial habitats
3. amount of habitat disturbance
4. season of use
5. aquatic habitat

Wildlife (continued)
6. wild horses
   a. habitat disturbance
   b. sensitivity to disturbance
7. compliance with Endangered Species Act, Section 7.

Cultural
1. compliance with Historic Preservation Act, Section 106

Visual
1. VRM Classes
2. short-term adverse impacts
3. long-term adverse impacts

Noise
1. construction impacts
2. operational impacts

Land Uses
1. Recreation
   a. developed site inventory
   b. access
   c. dispersed use areas
2. livestock grazing
   a. production loss
3. agriculture
   a. production change
   b. Prime and Unique Farmlands
4. wilderness

Land Use Controls and Constraints
1. federal, state and local land use plans

Transportation Networks
1. disruption

Social and Economic Conditions
1. population trends
2. employment conditions
3. indicators of economic well-being
4. fiscal status
5. temporary housing

Energy Use
1. energy used to construct and operate the pipeline versus energy transported by the pipeline.

Major floodplains crossed by the pipeline would be at the following river crossings: Pecos, Rio Grande, Rio Puerco, San Juan, Animas, La Plata, Colorado, White, and three crossings of the Green River. Specific locations are identified in Table 1-6. Although no impacts on flows would occur because the pipeline would be buried, there could be some short-term impacts resulting from construction upon water quality and riparian habitat. Construction in the river bed would result in downstream turbidity and sedimentation.

Loss of riparian habitat could result along the 50-foot-wide ROW and the 250 x 450 foot construction staging areas. Runoff from these disturbed sites would contribute to some turbidity. Since fuels and lubrication oils would be used at the construction staging areas, runoff entering the streams could contain these products.

Wildlife

Seasonal restrictions (Tables 1-8 and 1-11) on construction in crucial wildlife use areas would substiantially minimize impacts to wildlife. However, the potential for two significant impacts remain. The removal of vegetation along stream banks where high quality fisheries occur may result in more than short-term impacts if revegetation does not become reestablished within one year as anticipated.

The second potential impact may occur in the Rye-Grass Draw area (MP 818-820) where a new ROW could provide new human access to a crucial winter habitat, which could result in adverse disturbance.

Threatened or Endangered Wildlife and Plant Species

The biological assesssment required as a part of the ESA, Section 7 consultation process concerning this proposed project has been conducted for each of the species identified as possibly occurring near the proposed action.

Based on this biological assessment, the BLM has determined the whooping crane, Colorado Squawfish and razorback sucker may be affected by the proposed action (see following Biological Assessment Summary). Pursuant to Section 7 of the Endangered Species Act, the BLM is presently requesting formal consultation with FWS on the whooping crane and Colorado squawfish. Compliance would be determined prior to construction.

Mitigating measures that have the potential of reducing the possible effects to these species have been identified. Since the areas where the effects may occur involve private land, the BLM lacks the authority to stipulate those measures in the ROW grant. However, the BLM anticipates providing these measures to the U.S. Army Corps of Engineers as recommended conditions to be attached to the applicant's Section 10 or 404 permits for the Colorado River crossing near Moab, Utah and the Green River crossing near Jensen, Utah.

Cultural Resources

A BLM Class III cultural resource inventory is being undertaken and would be completed prior to construction to locate previously unrecorded surface cultural resources within the 50-foot right-of-way (ROW). A Memorandum of Agreement (MOA) between the Bureau of Land Management, the Advisory Council on Historic Preservation, and the appropriate State Historic Preservation Officers is being developed. This MOA would outline procedures to identify, evaluate, and protect cultural resources in, or eligible for inclusion in, the National Register of Historic Places. All surface resources and those known to exist in the ROW would be avoided, if avoidance is prudent and feasible (as determined in consultation with the appropriate surface management agency). Effects to surface resources which are not prudently or feasibly avoidable would be mitigated prior to construction. Therefore, any surface resources that may be affected would not be adversely impacted by the proposed action.

Construction

Recorded resources and resources located during the cultural resource inventory would be avoided, recorded, or have data recovered. Construction activities may alter, damage, or destroy previously unknown subsurface sites and result in disturbance to or loss of horizontal and vertical subsurface cultural information. Mixing and loss of artifacts and stratigraphic data could also occur. Alteration, damage, or destruction of these subsurface resources could result specifically in the following:

BIOLOGICAL ASSESSMENT SUMMARY[c]

Reference should be made to the biological assessment on file at the BLM-NMSO for specific details.

Species	Status[a]	Anticipated Effect	Remarks
Black-footed ferret (Mustela nigripes)	E	None	This determination pending completion of black-footed ferret surveys in project area as recommended by FWS. Formal consultation to be initiated if ferrets or evidence of ferrets discovered.
Bald eagle (Haliaeetus leucoephalus)	E	None	No known nests exist along proposed or alternative routes. Construction activities not expected to conflict with any migrating or wintering populations.
Peregrine falcon (Falco peregrinus)	E	None	No know eyries along proposed or alternative routes. Construction not planned during nesting season. Plentiful hunting habitat available for present populations.
Whooping crane (Grus americana)	E	May[b]	Potential migration stop at proposed Green River crossing near Moab, Utah. Recommended mitigation: avoid construction of river crossing during migration, October 1 to November 30; or monitor during migration period.
Colorado squawfish (Ptychocheilus lucius)	E	May[b]	Spawning in the vicinity of crossings of Colorado River near Moab, Utah and Green River near Jensen, Utah. Recommended mitigation: avoid construction of river crossing until after August 31, after spawning.
Humpback chub (Gila cypha)	E	None	Only occasionally or sporadically occur at the Colorado River Crossing near Moab, Utah and Green River crossing Jensen, Utah. Tolerant to turbid water conditions.
Razorback sucker (Xyrauchen texanus)	P	May	Possible spawning at same 2 river crossings as the squawfish. Same recommendation as the squawfish.
Bonytail chub (Gila elegans)	E	None	Sporadic occurrence in Green River near Jensen, Utah. Tolerant to turbid water conditions.
Pecos gambusia (Gambusia nobilis)	E	None	Nearest known population 20 miles south of proposed route. No potential habitat would be disturbed.
Mesa Verde cactus (Sclerocactus mesae-verde)	T	None	Nearest known population 50-60 miles southwest of proposed route.
Kuenzler Hedgehog cactus (Echinocereus kuenzleri)	E	None	Known distribution is about 40 miles to the west and southwest of the proposed route. No known populations traversed.
Knowlton cactus (Pediocactus knowltonii)	E	None	Known distribution is about 10 miles east of the proposed route. No known populations traversed.
Unita Basin Hookless cactus (Sclerocactus glaucus)	T	None	All known populations south of proposed route. No known populations traversed. Recent surveys of potential in northeast Utah revealed no population along the route in that area.

[a]E = Endangered, P = Proposed, and T = Threatened.

[b]Formal consultation requested concerning these species.

[c]This summary added to the DEIS.

Table 3-3. SUMMARY OF SIGNIFICANT VISUAL RESOURCE IMPACTS FOR PROPOSED ACTION

Milepost (State)	General Description	Short-Term Impact (3 to 5 years)	Long-Term Impact (5 years or longer)
Proposed Mainline			
MP 480-482 (CO)	Hills/mountainous	X	
MP 587-589 (UT)	Canyon/rock outcrop		X
MP 605-609 (UT)	Canyon		X
MP 708 (CO)	Mountainous	X	
MP 710-712 (CO)	Mountainous		X
MP 821-823 (UT)	River valley	X	
[a]MP 826-827 (UT)	Canyon	X	
Proposed Gathering Lines			
MP 10-11, West Leg (WY)	River/canyon	X	X

[a] Since publication of the DEIS, MAPCO has proposed specific alignment of the route in Jesse Ewing Canyon. This route specification would eliminate the significant impact at that location. The proposed location is shown in FEIS, Map A-3 in Appendix A.

Mainline

Construction of the proposed mainline would create significant visual impact in 6 areas. Five of the areas have similar physical features and impacts and are described as mountain/canyon areas. The remaining area is a river valley.

The 5[a] areas are found at Milepost (MP) 480-482 in the San Juan National Forest, Colorado; 587-589 near Kane Springs, Utah; MP 605-609 in Moab Canyon, Utah; MP 708 and MP 710-712 near Baxter Pass, Colorado. All of these are areas where a pipeline already exists. Contrasts in the above areas occur on steep or rugged slopes that are highly visible to passing motorists or recreationists. The mountain slopes and canyon walls form an enclosed viewing area where contrasts can be easily detected. The removal of tall, mature vegetation from slopes in the areas of the San Juan National Forest, and Baxter Pass, would change the existing vegetation form and create contrasting, unnaturally rigid lines. Post-construction and erosion prevention techniques may induce changes in the land surface that would moderately contrast with the existing land form. Revegetation of the right-of-way would diminish visual impacts at MP 480-482 (San Juan National Forest), and MP 708 (Baxter Pass), in 3-5 years. The right-of-way on the rocky slopes of Baxter Pass between MP 710-712 (Baxter Pass) would be difficult to revegetate or rehabilitate and the visual impact would be long term.

The Moab Canyon and Kane Springs areas are near heavily traveled routes or recreation stops where viewers would see the contrasts for longer periods of time. Moab Canyon and Kane Springs are semi-enclosed areas with rugged terrain, massive rock outcrops and sparse vegetation. The removal of large rocks and boulders from the ROW would create a strong to moderate contrast in the form and line of these formations (Figure 3-1). Revegetation would not significantly reduce this contrast so the impact would be long term.

There would be significant impact at MP 821-823, where the proposed pipeline crosses the Green River near Brown's Park. The entire area is used for recreation activities including river rafting. The river valley walls where the pipeline would cross are plainly visible to rafters and travellers in the area. Riparian vegetation which is scarce in the region grows tall and dense near the river. The removal of this vegetation would create contrasts in vegetation form and line that would take 3-5 years to rehabilitate.

Gathering Lines

The proposed gathering lines would be located primarily in Wyoming where the topography is less rugged than Colorado or Utah and the vegetation is sparse and low in height. There are occasional canyons and ridgeline features in the terrain. Throughout the gathering line system there would be only one significant visual impact on the West Leg gathering line at approximately MP 10-11. At this location, the proposed West Leg would cross the Green River in the Davis Bottom area of Flaming Gorge National Recreation Area. Canyon walls with multi-colored, horizontal bands, cottonwoods and other riparian vegetation can be found at this location. The river and surounding area are used for rafting, camping, and picnicking.

Removal of vegetation and the surface disturbance of canyon walls would create moderate to strong contrasts to the random vegetation pattern and the distinctive horizontal layers of the walls. The resulting vegetation contrasts would represent a short term impact because the revegetation capability of riparian vegetation is high. Contrasts to the canyon walls would be long term, however.

Pump Stations

None of the proposed pump stations would create a significant impact to visual resources. The pump stations are located away from major traffic routes, recreation areas and communities. The structures would be relatively small (see Figure 1-1, Chapter One) and similar to other structures found in the respective areas. The station with the microwave tower (Dragon) would be located in a canyon which is 12 miles from the nearest highway.

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[a] **FEIS Changes to the Text for DEIS p. 1-27 indicates a revised route in Jesse Ewing Canyon which eliminated 1 significant visual impact.**

Wilderness Resources

The proposed route would cross one mile of an area which has been added to the Red Creek Badlands-Tepee Mountain Inventory in Wyoming. The area was added to the unit for further review after having been officially dropped from the Wilderness program in 1979. As discussed in the FEIS summary, a decision about whether or not the proposed action remains a viable alternative is being delayed. If wilderness characteristics are determined to be present, further impact analysis would be necessary.

Operation

Energy requirements for operation and maintenance of the proposed action were estimated based on three calculations: (1) fuel from the pipeline used to power pump stations; (2) small trucks for maintenance; and (3) light aircraft fuel for routine inspections.

Fuel for pump station turbines would be used from the mixed stream of NGL carried by the pipeline. Fuel use estimates for pump station turbines were based on a mix of the NGL which represented a conservative assumption in that a higher proportion of the shorter chain hydrocarbons (ethane, propane, and butane) was assumed. For the initial capacity of 35,000 BPD, 5 pump stations (8000 horsepower) would require 418.3 barrels (17,570 gallons) of NGL daily. For 65,000 BPD capacity, 10 pump stations (20,000 horsepower) would need about 1046 barrels (43,920 gallons) of NGL daily.

For routine maintenance, the use of 5 small trucks would require approximately 7500 gallons of gasoline annually, and aerial inspections would require about 6548 gallons of aviation gas per year.

Energy Balance

The energy balance estimate was calculated by converting the various fuels (diesel, gasoline, and NGL mixed stream) into the common denominator of BTUs. Generally, a BTU is a measure of heat. This heat measure was used to compare the amount of heat which could be generated by the fuels used for construction and operation with the amount of heat which could be generated by the NGL carried by the pipeline over the 30-year life of the project. For the purpose of this energy balance comparison, the analysis assumes that all the NGL would be used for heat. As indicated in Chapter One, however, some of the NGL carried by the pipeline would actually be used in the manufacture of chemicals and other products.

The use of the heat value in BTUs for the NGL in this analysis intentionally underestimates its energy value. The use of NGL chemical products is much more energy-efficient than simply burning them for heat.

The estimated heat balance for the proposed action is summarized in Table 3-4. For the 35,000 BPD capacity, the analysis indicates that roughly 1.53 percent of the heating value of the NGL transported by the pipeline would be required to construct and operate the proposed action. The equivalent percent for the 65,000 BPD capacity is 1.79. The comparison indicates that the pipeline transportation operation is energy efficient.

UNAVOIDABLE ADVERSE IMPACTS

Paleontology

Subsurface vertebrate fossils may be destroyed or damaged during construction maintenance or repair activities.

Cultural Resources

Subsurface sites may be destroyed or damaged during construction, maintenance, or repair activities. An increased ease of access for conventional vehicles may occur, resulting in an increase in the potential for vandalism.

Visual Resources

Completion of the project would cause unavoidable visual resource impacts in 7 separate areas along the main route. Many of the identified areas are highly valued for scenic quality and are visible from roadways or recreation areas. The outlined restoration program (Chapter One, Proposed Action, Construction Methods) would reduce visual impacts in 3 areas in 3-5 years (MP 480-482 [San Juan National Forest], 708 [Baxter Pass], and 821-823 [Green River near Brown's Park]. One of the remaining areas (MP 710-712 [Baxter Pass]) would recover during the life of the project, but 2 other areas (MP 587-589 [Kane Springs] and 605-609 [Moab Canyon]) would have permanent visual impact. At these 2 locations a cumulative visual impact would result as there is already visual evidence of an existing pipeline in both areas. Proposed efforts to reduce these impacts would not be effective enough to reduce significant visual impacts over the long term in these areas. **There would be both a short and long term visual impact at MP WL 10-11 in the Davis Bottom area of the northernmost Green River crossing.**

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE AND LONG-TERM PRODUCTIVITY

The following discussions address the trade-off between local short-term use of the

Table 3-6. SUMMARY OF SIGNIFICANT VISUAL RESOURCE IMPACTS FOR ALTERNATIVES

Milepost	General Description	Short-Term Impact (3 to 5 years)	Long-Term Impact (5 years or longer)
Alternatives			
Douglas Pass (AB)			
MP 27-29	Mountainous		X
MP 32	Mountainous	X	
MP 40-43	Mountainous	X	
Little Mountain (DF)			
MP 21-24	Hills/river		X
Pine Mountain (DEG)			
MP 21-23	River valley	X	
MP 26-27	Canyon	X	
MP 39-41	Mountainous	X	

Prime and Unique Farmland

This alternative would disturb an estimated six acres of Prime, no Unique, 14 acres of Statewide Importance, no Locally Important, and nine acres of Other Farmland (SCS 1979a, 1979b, 1979c). However, none of these lands would be irreversibly converted to other uses, and the viability of these lands would not be diminshed.

Little Mountain (DF)

Paleontology

Approximately 19 miles of formations known to contain significant fossil localities (Table 3-5) would be crossed.

Visual Resources

There would be significant impact to the visual resources between MP 21 and MP 24 north and south of where the alternative crosses the Green River at Little Hole. Removal of pinon-juniper from the hillside would create a contrast to the line and color of the vegetation visible to recreation users near the Little Hole area of the Flaming Gorge National Recreation Area, Ashley National Forest. Significant differences in the line and color would diminsh in 3-5 years as vegetation is reestablished. **As the line would proceed up Goslin Mountain, a significant long lasting contrast would be created.**

Land Use Controls and Constraints

The crossing of the Little Hole recreation area would conflict with the proposed expan-sion of this area and with management deci-sions regarding recreational development by the FS.

Prime and Unique Farmland

This alternative would disturb an extimated 18 acres of Statewide Important Farmland but no known areas of Prime, Unique, Locally Important, or other Farmland (Erickson 1980; Millsap 1979). However, none of these lands would be irreversibly converted to other uses, and the viability of these lands would not be diminshed.

Pine Moutain (DEG)

Paleontology

This alternative would cross approximately 19 miles of formations known to contain significant fossil localities (Table 3-5).

Visual Resources

There would be 2 areas with significant visual resource impacts along this alternate route. The first is at MP 21-23 which is identical to MP 821- 823 (Green River near Browns Parks) and is are discussed under Mainline. The second location would occur at MP 41-42 on Pine Mountain, Wyoming. Coniferous forest and steep, rocky slopes are found at this location. Pipeline construction would create moderate contrasts to the form and line of the vegetation. Removal of vegetation would expose a light-colored, rocky surface, creating a strong contrast to the surrounding green vegetation. This contrast would be seen in the background (5-15 miles) of views from the nearest travel routes. As revegetation progresses, contrasts would become less noticeable. However, it will take 3-5 years to reduce the visual impact in this location and as much as 30 years to restore it to near original condition.

Prime and Unique Farmland

Approximately 12 acres of Statewide Important Farmland would be disturbed by this alternative; however, no known areas of Prime, Unique, Locally Important or Other Farmland would be disrupted (Erickson 1980; Millsap 1979; Robinson 1979). However, none of these lands would be irreversibly converted to other uses, and the viability of these lands would not be diminished.

No Action

Energy Use

The effect of the no action alternative would be that the energy that would have been used in construction would not be used for that purpose. However, the 35,000 to 65,000 BPD that would have been available for use in the chemical industry and other energy use areas would not be available. Instead, these petroleum products (liquid hydrocarbons) would have to be re-injected (with possible loss) or distributed in some other manner, such as, by truck or rail. These other modes of transportation would be less energy efficient.

Delay of Project

Social and Economic Conditions

The effect of the delay of project would be that the lost revenue to MAPCO is estimated to

be about $60,000 per day plus the increased cost of materials and labor for construction due to inflation (estimated to be at least 1 percent per month). The other effect of this alternative is decreased efficiency of processing plant

Table 3-7. SUMMARY OF COMPARITIVE INFORMATION FOR PROPOSED ACTION AND ALTERNATIVES

Information for Comparison	Total Proposed Project	Comparison One		Comparison Two			No Action	Delay of Project
		AC[a] Baxter Pass, CO	AB Douglas Pass, CO	DEF[a] East of Little Mountain, UT,WY	DF Little Mountain, UT,WY	DEG Pine Mountain, UT,WY		
Miles	1,172	74	72	63	56	68	0	1,172
Acres disturbed	7,102	436	448	382	339	412	0	7,102
Miles near existing utilities[b]	1,083	71	72	**53**	**36**	**59**	0	1,083
Percent of total near existing utilities	92	96	100	**85**	**65**	**86**	0	92
Miles not near existing utilities	89	3	0	**10**	**20**	**9**	0	89
Percent of total not near existing utilities	8	4	0	**15**	**35**	**14**	0	8
Miles in proposed ACEC	4	0	0	4	0	4	0	4
Miles in Flaming Gorge National Recreation Area	1	0	0	1	1	0	0	1
Number of major rivers crossed	12	0	0	1	1	1	0	12
Number of proposed Wild and Scenic rivers crossed	1	0	0	1	1	1	0	1
Gallons of estimated fuel use for construction	968,072	61,124	59,472	52,038	46,254	56,158	0	968,072
Number of Developed Recreation Areas Crossed	**0**	**0**	**0**	**0**	**1**	**0**	**0**	**0**

[a]Proposed action.

[b]Includes 416 miles of existing MAPCO ROW (35% of total).

Table 3-10. SUMMARY OF HUMAN USE INFORMATION FOR COMPARISON OF PROPOSED ACTION AND ALTERNATIVES

Information for Comparison	Comparison One		Comparison Two		
	AC[a] Baxter Pass, CO	AB Douglas Pass, CO	DEF[a] East of Little Mountain, UT,WY	DF Little Mountain, UT,WY	DEG Pine Mountain, UT,WY
Cultural Resources					
Expected Surface Site Density	high	moderate to high	moderate to high	high in small areas moderate below 7500' low above 7500'	high in small areas moderate below 7500' low above 7500'
Expected Subsurface Site Density	high in alluvial areas	high in alluvial areas	high in alluvial areas	high in alluvial areas	high in alluvial areas
Expected Significance for Local Research Goals	high	high	high	high	high
Expected Significance in Terms of Eligibility to National Register	low	high	moderate to high	moderate to high	moderate to high
Miles of VRM Classes Crossed					
Class I	0	0	0	0	0
Class II	34	34	15	18.5[b]	9
Class III	18	37	9	13.5	9
Class IV	20	30	33	24	50
Class V	0	0	6	0	0
Miles of significant visual impacts	2.5	5.5	2	3	4
Wilderness					
boundaries crossed	0	0	1[c]	0	0
access increased by ROW	0	0	0	0	0
areas within two miles	2	1	0	3	3
Number of acres of Important Farmland disturbed					
Prime and Unique	0	6	0	0	0
state	0	14	12	18	12
local	0	0	0	0	0
other	0	9	0	0	0

[a]Proposed Action.

[b]One of these miles is in a potential ACEC for visual resources.

[c] The Red Creek Badlands-Tepee Mountain WSU was expanded since the time of publication to include an area which this alternative would cross for about one mile.

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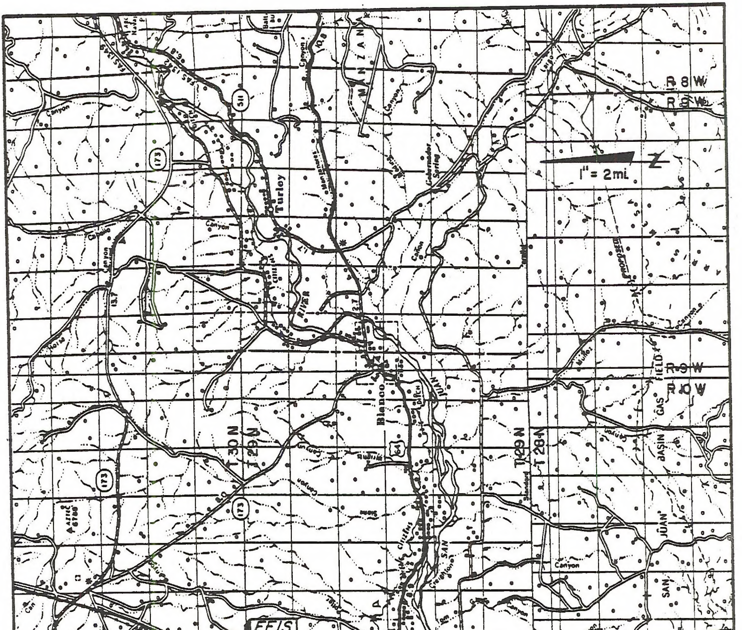
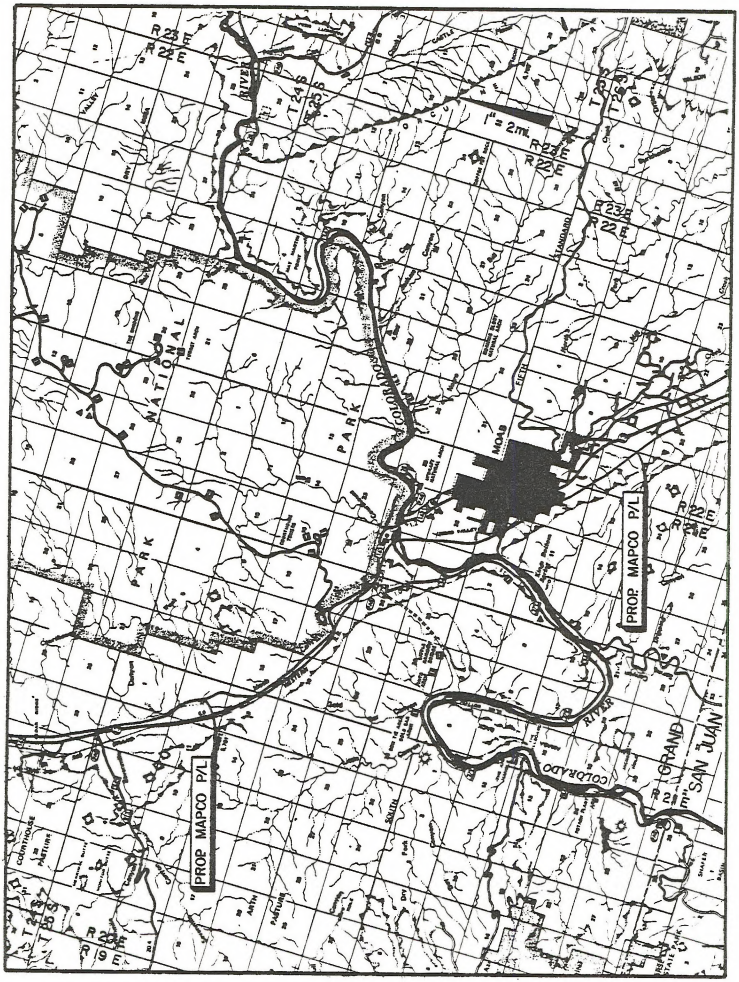
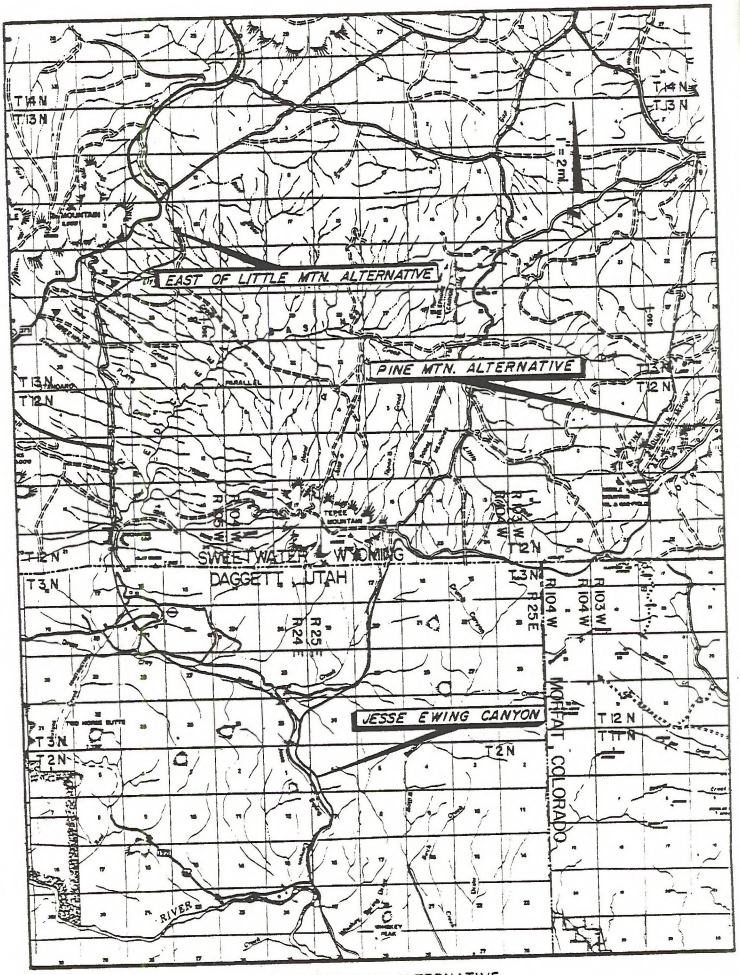
APPENDIX A



MAP A-1. BLOOMFIELD AREA



MAP A-2. MOAB CANYON AREA



MAP A-3. JESSE EWING CANYON, PINE MOUNTAIN ALTERNATIVE AND EAST OF LITTLE MOUNTAIN ALTERNATIVE AREAS

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