



Office of
Energy Projects
April 2018

**Questar Southern Trails Pipeline
Company**

Docket Nos. CP18-39-000

Navajo Tribal Utility Authority

and CP18-40-000

Southern Trail Pipeline Abandonment Project

Environmental Assessment

Washington, DC 20426

**ENVIRONMENTAL ASSESSMENT
SOUTHERN TRAIL PIPELINE ABANDONMENT PROJECT**

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ABBREVIATIONS AND ACRONYMS

CAA	Clean Air Act
CFR	Code of Federal Regulations
CH ₄	methane
Commission	Federal Energy Regulatory Commission
CS	compressor station
CSLC	California State Lands Commission
dBA	decibel level on the A-weighted scale
EA	environmental assessment
EI	environmental inspector
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FERC	Federal Energy Regulatory Commission
FWS	U.S. Fish and Wildlife Service
GHG	Greenhouse gas
L _{dn}	day-night sound level
L _{eq}	equivalent sound level
MAP	Measurement Allocation Point
MP	milepost
M&R	meter and regulating
NEPA	National Environmental Policy Act
NAAQS	National Ambient Air Quality Standards
NOI	<i>Notice of Intent to Prepare an Environmental Assessment for the Southern Trail Pipeline Abandonment Project and Request for Comments on Environmental Issues</i>
NO ₂	nitrogen dioxide
NRHP	National Register of Historic Places
NTUA	Navajo Tribal Utility Authority
CSLC	California State Land Commission
OEP	Office of Energy Projects
PCB	polychlorinated biphenyl
PG&E	Pacific Gas & Electric
Plan	<i>FERC's Upland Erosion Control, Revegetation, and Maintenance Plan</i>
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns

PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
Procedures	FERC's <i>Wetland and Waterbody Construction and Mitigation Procedures</i>
Project	Southern Trail Pipeline Abandonment Project
Questar	Questar Southern Trails Pipeline Company
SHPO	State Historic Preservation Office
SO ₂	sulfur dioxide
SPCC Plan	Questar's Spill Prevention, Control, and Countermeasure Plan

A. PROPOSED ACTION

The staff of the Federal Energy Regulatory Commission (Commission or FERC) has prepared this environmental assessment (EA) to assess the environmental impacts of the Southern Trail Pipeline Abandonment Project (Project) and related facilities proposed by Questar Southern Trails Pipeline Company (Questar). We¹ prepared this EA in compliance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations for implementing NEPA (Title 40 of the Code of Federal Regulations [CFR], Parts 1500-1508 [40 CFR 1500-1508]), and the Commission's implementing regulations.²

1. Introduction

On December 22, 2017, Questar, filed an application with the Commission in Docket No. CP18-39-000, pursuant to section 7(b) of the Natural Gas Act to abandon its certificate of public convenience and necessity, including its blanket certificate authorities. Questar also requests to abandon, part by sale and part in-place, all of its certificated facilities dedicated to providing jurisdictional transportation service including approximately 488 miles of natural gas pipeline and related facilities located in California, Arizona, Utah, and New Mexico.

In a related filing, on December 22, 2017, the Navajo Tribal Utility Authority (NTUA) filed an application with the Commission in Docket No. CP18-40-000, pursuant to Section 7(f) of the Natural Gas Act and Part 157 of the Commission's regulations, requesting a service area determination within which NTUA may, without further Commission authorization, enlarge or expand its natural gas distribution facilities and a waiver of all reporting, accounting, and other rules and regulations normally applicable to natural gas companies. NTUA also requests a waiver of the Commission's accounting and reporting requirements and other rules and regulations normally applicable to natural gas companies. NTUA would utilize those acquired facilities to provide its own service, replacing the service historically provided to it by Questar. The remaining facilities not sold to the NTUA would be abandoned in-place.

The Project would consist of abandonment by sale of about 268 miles of pipeline facilities and abandon in-place of approximately 220 miles of pipeline facilities, totaling about 488 miles of existing mainline natural gas pipeline located between the Essex Meter Facility with Pacific Gas & Electric (PG&E) in San Bernardino County, California and extending northeast to the Milagro Plant in San Juan County, New Mexico. Specifically, Questar proposes to:

¹ "We," "us," and "our" refer to the environmental staff of the Office of Energy Projects.

² See 18 CFR 380.

- ***Abandon in place:***

- about 220 miles of 16-inch-diameter pipeline extending northeast from the Essex Metering and Regulating (M&R) Facility with PG&E in San Bernardino County, California to its Grey Mountain main line block valve in Coconino County, Arizona;
- Mohave Valley Compressor Station in Mohave County, Arizona;
- two delivery interconnects and associated M&R facilities, and all other appurtenant facilities, as necessary; and
- ancillary facilities in San Bernardino County, California; Mohave, Yavapai, Coconino and Apache Counties, Arizona; and San Yuan, Utah.

- ***Abandon by sale:***

Abandon by sale to NTUA about 268 miles of its interstate pipeline, three compressor stations (CS), and related facilities, specifically:

- about 168.0 miles of 16-inch-diameter pipeline extending northeast from Questar's Grey Mountain block valve in Coconino County, Arizona to its Red Mesa CS in San Juan County, Utah;
- approximately 41.3 miles of 20-inch-diameter pipeline extending east from Quastar's Chinde Wash Launcher and Receiver facility in San Juan County, New Mexico to its Milagro Plant Interconnect in San Juan County, New Mexico;
- about 58.9 miles of 12-inch-diameter pipeline extending southeast from Questar's Red Mesa CS in San Juan County, Utah to its Chinde Wash Launcher and Receiver facility in San Juan County, New Mexico;
- three compressor stations including Shiprock CS in San Juan County, New Mexico; Red Mesa CS in San Juan County, Utah; and Cameron CS in Coconino County, Arizona; and
- six interconnects: three receipt point interconnects and three delivery point interconnects with associated M&R facilities, and other appurtenant facilities, as necessary.

The general Project location is shown in figure 1.

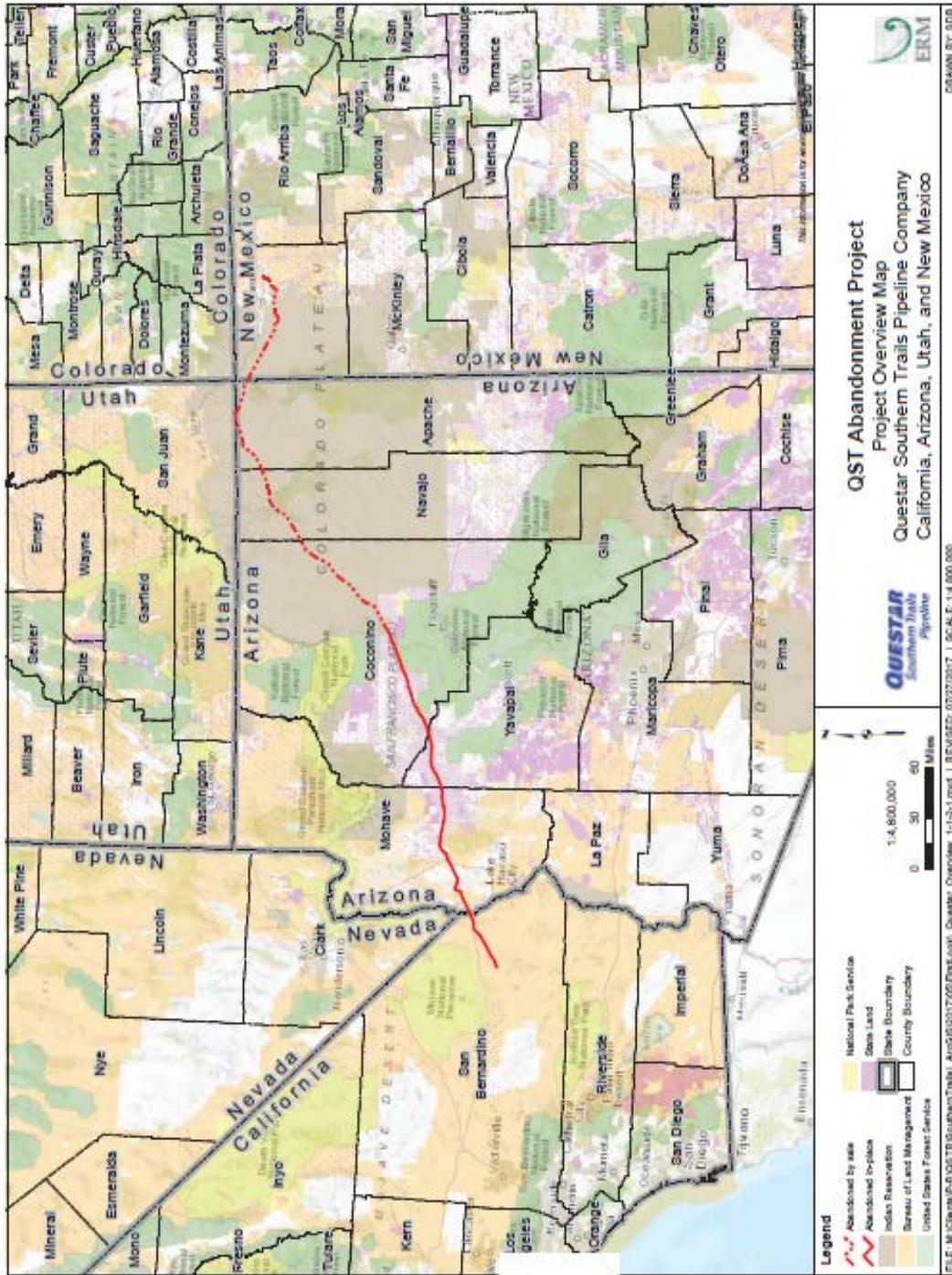


Figure 1: Project Map

The assessment of environmental impacts is an important and integral part of the Commission's decision-making process. Our principal purposes in preparing this EA are to:

- identify and assess the potential impacts on the natural and human environment that would result from the implementation of the Project;
- identify and recommend reasonable alternatives and specific mitigation measures to avoid or minimize environmental impacts; and
- encourage and facilitate public involvement in the environmental review process.

As such, we prepared this EA to assess the environmental impacts that would likely occur as a result of Questar's proposed abandonment of the identified facilities. We have developed and incorporated measures into this EA that we believe would appropriately and reasonably avoid, minimize, or mitigate environmental impacts associated with the abandonment activities. This EA will be used by the Commission in its decision-making process to determine whether to authorize Questar's proposal.

Regarding NTUA's related application, the determination of whether to grant NTUA's request for service area determination and to waive certain regulatory requirements is an administrative decision that does not require a NEPA analysis. Therefore, this EA is focused on Questar's abandonment proposal.

2. Purpose and Need

Questar states that it has experienced consistent and significant operational losses year after year, and there is insufficient current or reasonably expected demand for the transportation services. In addition, abandonment would avert costs for future operation and maintenance expenditures on facilities that are no longer in service. Questar has executed definitive documentation with the NTUA to sell certain facilities to the NTUA so that it may utilize the facilities for gas distribution services.

Section 7(b) of the Natural Gas Act specifies that no natural gas company shall abandon any portion of its facilities subject to the Commission's jurisdiction without the Commission first finding that the abandonment will not negatively affect the present or future public convenience and necessity.

3. Public Review and Comment

On February 8, 2018, the Commission issued a *Notice of Intent to Prepare an Environmental Assessment for the Southern Trail Pipeline Abandonment Project and Request for Comments on Environmental Issues* (NOI). The NOI was mailed to approximately 545 interested parties, including federal, state, and local officials; agency representatives; environmental and public interest groups; Native American Tribes; and

property owners along the proposed pipeline facilities to be abandoned in place. Written comments were requested from the public on specific concerns about the Project or environmental issues that should be considered during the preparation of the EA.

In response to the NOI the Commission received comments from California State Lands Commission (CSLC), the U.S. Environmental Protection Agency (EPA), and from Atkinson Trading Company, a landowner. All substantial comments are summarized below and addressed in the applicable sections of this EA.

The NTUA requested to serve as a consulting party on the Project.

On January 24, 2018, CSLC filed a protest with the Commission regarding the abandonment in place of the pipeline on State lands. Later, on February 15, 2018 CSLC filed a letter with the Commission that the proposed abandonment authority applies only with respect to Questar's Commission certificate to operate the pipeline and does not alter Questar's property rights or property obligations. CSLC added that Questar's letter to CSLC reaffirmed its commitment to maintain its obligations under the leases associated with the pipelines on California State lands. Therefore, CSLC has no objection to Questar's application to abandon its certificate to operate its pipeline.

On March 5, 2018, the EPA filed its comments on the Project and identified several issues and recommended that we address them in our EA. These issues include: impacts to water, air, biological resources, invasive species management and habitat protection. The EPA's concerns are addressed in section B (environmental analysis) under related environmental resources.

Atkinson Trading Company (a landowner), expressed concern about the construction activities, access to the property, and eminent domain. The sale of the relevant portion of the pipeline to NTUA would have no impact on the environmental resources because Questar has not proposed any construction in this area and facilities are already in operation.

By letter dated February 26, 2018, the Bureau of Land Management informed Questar that the temporary use areas are all within existing previously disturbed areas and occupy about 0.83 acre in Sections 26 and 27, 17N, R17E in San Bernardino County, California, and expressed no concerns.

Nonjurisdictional Facilities

Although no jurisdictional facilities would be constructed, the abandonment by sale to NTUA would result in a reasonably foreseeable nonjurisdictional activity. These activities include work at Shiprock CS, Red Mesa CS, and Cameron CS and are described in Work Site B below under Abandonment of Facilities.

4. Abandonment of Facilities

Abandonment activities would be performed at many Project sites and would require a variety of abandonment work crews on existing pipeline facilities, and are grouped into four Work Site categories (A, B, C and D) as described below and in table 1B-1 of appendix 1B of Questar's application (FERC accession number 20171222-5072):

- Work Site A – This work site applies only to the Essex Meter Facility. Essex Meter Facility site includes existing M&R facility and access roads, and temporary workspace for equipment staging and parking. Abandonment activities would be limited to the existing site boundaries and the identified temporary workspace. Site required for crew truck, flatbed trailer, crane truck, temporary compression trailers and transports, nitrogen generation plant, nitrogen plant trailer, welding trucks, and pick-up trucks within the existing site and existing access roads.
- Work Site B – This work site applies to 5 sites: Blanco M&R Hub, North Needles M&R Station, Shiprock CS, Red Mesa CS, and Cameron CS. Abandonment activities would be limited to the existing site boundaries. Site required for crew truck, flatbed trailer, crane truck, welding trucks, and pick-up trucks within the existing site and existing access roads. Abandonment work at 3 compressor stations would also require a nitrogen transport (semi-truck and nitrogen tank trailer).
- Work Site C – This work site applies only to the Grey Mountain Main Line block valve at reference point (RP) 219.5. Site required within the existing main line block valve site, adjacent permanent pipeline right-of-way, and access roads. Abandonment activities would include minor excavation (approximately 0.02 acre) to cut and cap the pipeline segment to separate the pipeline facilities to be abandoned in-place from the pipeline facilities to be abandoned by sale and may be used for crew truck, flatbed trailer, rubber-tired backhoe, welding trucks and pick-up trucks.
- Work Site D – This work site applies to approximately 13 sites (Mohave Valley CS, Griffith Tap and Lateral, and 11 main line block valves). Site required within the existing sites, the adjacent pipeline right-of-way, and access roads. Abandonment activities would be minor and limited to the existing site boundaries and adjacent pipeline right-of-way that may be used for pick-up truck parking to monitor gas quality at existing pipeline facilities.

Questar has adopted and would restore all disturbed areas in accordance with FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures).³

Questar's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) outlines specific preventive measures and practices to reduce the likelihood of an accidental release of a hazardous material, in the event such release occurs to expedite the response and remediation of the release. The SPCC Plan also restricts the location of fuel storage, fueling activities, and construction equipment maintenance along the abandonment activity area and provides appropriate procedures for these activities. The SPCC Plan also includes training, communication to facilitate the prevention, response, containment and cleanup of spills during abandonment activities. Quester would include its SPCC Plan in the bid and the contract documents as contractual requirements and instructions to the contractor. We have reviewed Questar's SPCC Plan and find it adequate.

Table 1 identifies the pipeline facilities to be abandoned and table 2 identifies the location of the eight interconnect and associated Measurement Allocation Point (MAP) facilities to be abandoned.

³ The FERC Plan and Procedures are a set of construction and mitigation measures that were developed to minimize the potential environmental impacts of the construction of pipeline projects in general. The FERC Plan can be viewed on the FERC internet website at <http://www.ferc.gov/industries/gas/enviro/plan.pdf>. The FERC Procedures can be viewed on the FERC internet website at <http://www.ferc.gov/industries/gas/enviro/procedures.pdf>.

Table 1: Pipeline Facilities to be Abandoned for the Project

State / County	Reference Point (RP) ^a		Approximate Length (miles)
	Beginning	Ending	
ABANDONED IN PLACE			
ESSEX METER FACILITY TO SUNFLOWER RD L&R (0.5 MI OF 16-INCH) LATERAL PIPELINE			
California / San Bernardino ^b	Essex Meter Facility RP 0.0	Essex Tap at Sunflower Rd L&R RP 0.5	0.5
SUNFLOWER RD L&R TO MOHAVE VALLEY CS (41.6 MI OF 16-INCH) PIPELINE			
California / San Bernardino ^b	RP 0.5	RP 37.0	36.5
Arizona / Mohave ^b	RP 37.0	Mohave Valley CS RP 42.1	5.1
MOHAVE VALLEY CS TO GREY MOUNTAIN BLOCK VALVE (177.4 MI OF 16-INCH) PIPELINE			
Arizona / Mohave ^b	RP 42.1	RP 121.3	79.2
Arizona / Yavapai ^b	RP 121.3	RP 155.0	33.7
Arizona / Coconino ^b	RP 155.0	Grey Mountain BV RP 219.5	64.5
ABANDONED BY SALE			
GREY MOUNTAIN BLOCK VALVE TO RED MESA CS (168.0 MI OF 16-INCH) PIPELINE			
Arizona / Coconino	Grey Mountain BV RP 219.5	RP 298.8	79.3
Arizona / Navajo	FP 298.8	RP 349.0	50.2
Arizona / Apache	RP 349.0	RP 384.8	35.8
Utah / San Juan	RP 384.8	Red Mesa CS RP 387.5	2.7
RED MESA CS TO CHINDE WASH L&R (58.9 MI OF 12-INCH) PIPELINE			
Utah / San Juan	Red Mesa CS - RP387.5	RP 389.3	1.8
Arizona / Apache	RP 389.3	RP 410.0	20.7
New Mexico / San Juan	RP 410.0	Chinde Wash L&R – RP 446.4	36.4
CHINDE WASH L&R TO BLANCO M&R (40.3 MI OF 20-INCH) PIPELINE			
New Mexico / San Juan	Chinde Wash L&R – RP 446.4	Blanco M&R – RP 486.7	40.3
BLANCO M&R TO MILAGRO INTERCONNECT (1.0 MILES OF 20-INCH) PIPELINE			
New Mexico / San Juan	Blanco M&R – RP 486.7	Milagro Interconnect – RP 487.7	1.0
^a	Reference Point (RP) indicate approximate pipeline segment mileage. RP cross-reference to Questar Milepost (Questar MP) are included in application - appendix table 1B-1.		
^b	Pipeline facilities to be abandoned in-place. In Coconino County, Arizona, the pipeline and appurtenant facilities are from RP 155.0 extending to approximately RP 219.5 and include the Grey Mountain main line block valve at RP 219.5. Table 1B-1 in the application provides details on the Pipeline Facilities to be abandoned in-place. All other facilities will be abandoned by sale.		

Table 2: Interconnect and Associated Measurement Allocation Point Facilities to be Abandoned for the Project

MAP No.	Facility Name	County, State	Section-Township-Range
20001 ^a	TransColorado Blanco M&R	San Juan, NM	S14, T29N, R11W
20002	Williams Field Services Milagro Interconnect	San Juan, NM	S12, T29N, R11W
20003 ^a	TransWestern Blanco M&R	San Juan, NM	S14, T29N, R11W
20004	Tuba City Tap	Coconino, AZ	S29, T32N, R12E
20008	Kayenta	Navajo, AZ	S15, T38N, R19E
20302 ^b	SoCal Gas North Needles	San Bernardino, CA	S10, T9N, R 22E
20303 ^b	PG&E Essex Meter Facility	San Bernardino, CA	S20, T7N, R18E
20304	Red Mesa Tap	Apache, AZ	S5, T41N, R28E
^a	TransColorado (MAP No. 20001) and TransWestern Blanco Hub (MAP No. 20003) located at the Blanco M&R site.		
^b	MAP locations to be disconnected, shut-in and abandoned in-place. All other MAP locations to be abandoned by sale.		

Abandonment activities at the sites identified in table 2 above would include disconnecting, isolating, and installing blind flanges or removing aboveground ancillary facilities. The existing facility sites for abandoned work activities have been grouped into two categories: compressor stations and interconnects. The four compressor stations are discussed above. The 16 interconnect locations are either M&R facilities with taps, main line valves (not located at compressor stations), cut-and-cap work site, and launcher and receiver facilities (not located at compressor stations), or taps only (both customer and interconnect taps).

5. Land Requirements

Abandonment activities would affect a total of about 27.25 acres, all of which are within existing facility sites and Questar’s existing easements or permanent pipeline right-of-way. Land requirements associated with the Project by workspace configuration are provided in table 3 below and appendix table 1B-1 of appendix 1B in Questar’s application (FERC accession number 20171222-5072) for the specific work site land requirements.

Table 3: Land Requirements for the Project		
Activity	Associated Facility Type	Land Affected During Abandonment (acres) ^a
Abandonment Work Sites		
Work Site A ^b	Essex Meter Facility	0.88
Work Site B ^c	Shiprock, Red Mesa and Cameron CSs, and Blanco Hub and North Needles M&R Stations	13.42 ^c
Work Site C ^d	Grey Mountain main line block valve at RP 219.5	0.23 ^d
Work Site D	Mohave Valley CS, 11 main line block valves, and the Griffith Tap and lateral facilities	12.72
TOTAL		27.25
^a	Acres are rounded to the hundredth decimal place for presentation purposes. Total acres affected during abandonment activities may not add up to the sum of columns presented.	
^b	Essex Meter Facility site acreage is approximately 0.88 acre including existing M&R facility (about 0.05 acre) and temporary workspace for equipment staging and parking during blowdown activities (about 0.83 acre).	
^c	Work Sites where aboveground facility modifications are required for abandonment activities.	
^d	Grey Mountain Block Valve cut-and-cap work site is 0.23 acre including minor excavation area (less than 0.02 acre) for exposure of existing pipeline segment for the cut-and-cap abandonment activities.	

All ground surface disturbances would occur within the existing Project site property or easement boundaries, access roads and the temporary workspace at the Essex Meter Facility, or within the existing permanent right-of-way limits. Only minor excavation (about 0.02 acre) or subsurface ground disturbance would occur for abandonment activities at the Grey Mountain main line block valve cut and cap location. Following abandonment, all of the existing project sites and the existing permanent pipeline right-of-way will continue to be maintained. No new permanent right-of-way would be required for the abandonment activities. The existing permanent right-of-way is about 50 feet wide.

Contractor/Storage Yards

The existing Essex Meter Facility and Cameron CS sites would be used for staging and storage yards for the Project including the minor temporary workspace (about 0.83 acre) at the Essex Meter Facility. Project management, vehicle parking, equipment staging, and materials storage would occur within the requested workspace which is wholly contained within the existing fence line of these sites, existing access roads, and the Essex Meter Facility temporary workspace.

Access Roads

Access to the Project sites would be through existing public roads as well as Questar’s existing access roads. Numerous existing public roads and existing access

roads would be used for access. Existing access roads may require maintenance of surface; however, no access road modification, upgrades, or improvements are currently proposed for abandonment activities.

Prior to commencement of abandonment activities, if conditions indicate that improvements and construction of additional temporary roads are needed, Questar would file the locations of the new access roads or improvements with the Commission for review and approval prior to use.

6. Abandonment Schedule and Workforce

Questar anticipates abandonment activities may begin in May 2018 subject to receipt of the required permits and approvals. Abandonment activities are expected to be completed by multiple crews working simultaneously at several sites for evacuating and blowdown of existing natural gas, and nitrogen purging and packing each of the proposed four pipeline segments and cut-and-cap work.

The combined labor force would consist of about 11 to 15 individuals at any one time. Questar anticipates abandonment work to be complete by December 2018.

7. Permits and Consultations

Table 4 summarizes the permits, approvals, and consultations applicable to the proposed Project. Questar stated that it will obtain all necessary permits, licenses, and approvals for the Project, prior to commencing abandonment activities.

Table 4: Permits and Consultations

Agency	Permit/Consultation	Status
FEDERAL		
Federal Energy Regulatory Commission	Section 7(b) Application	Under review
U.S. Army Corps of Engineers -Los Angeles District, California -Arizona Office of Los Angeles District, California	Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act for facilities in California, Arizona, Utah, and New Mexico	No permit required under 404. Letter dated March 29, 2018. To be filed Email correspondence of March 28, 2018. Response pending.
U.S. Fish and Wildlife Service - Arizona Ecological Services Office, Phoenix, Arizona - lead office for the Project (California, Arizona, Utah, and New Mexico).	-Consultation regarding compliance with Section 7 of the Endangered Species Act -Consultation under Migratory Bird Treaty Act and Bald & Golden Eagle Protection Act -Consultation under Section 2 of the Fish and Wildlife Coordination Act	Consultation is complete and has no further comments. March 20, 2018 and email to staff on March 22 and 26, 2018.
Bureau of Land Management -Needles, California Field Office	Land Use Permit for temporary use	Anticipate issuance of permit prior to April 30, 2018.
State Historic Preservation Offices California State Historic Preservation Office		Consultation on behalf of FERC may be complete if exemption regarding Historic Preservation Review Process for projects involving Historic Natural gas pipeline is applicable. January 23, 2018.
Arizona State Historic Preservation Office		No Effect determination February 1, 2018.
New Mexico State Historic Preservation Office		Received letter dated January 25, 2018 for clarification, Questar sent response on March 6, 2018 to New Mexico. Pending
Utah State Historic Preservation Office		Concurrence - No Effect, January 30, 2018.

B. ENVIRONMENTAL ANALYSIS

The Project involves abandonment of facilities within the existing pipeline right-of-way and compressor station sites, and would result in minimal disturbance. Questar would maintain the facilities to be abandoned in place between Essex M&R Facility with PG&E in San Bernardino County, California and its Grey Mountain main line block valve in Coconino County, Arizona, and plans to preserve the facilities for future use or sale to third parties. Questar would not conduct any cleaning of the abandonment in-place pipeline facilities. Also, Questar would implement its SPCC Plan and the measures in our Plan and Procedures to minimize impacts. Therefore, the Project would not significantly affect the following:

- Geology – no blasting would be required and there are no known geologic hazards or resources near proposed workspaces that would be impacted by the proposed abandonment (in place or by sale).
- Soils – Questar would adopt and implement our Plan and Procedures.
- Water Resources – no groundwater, aquifer areas, public water supplies, surface waters or wetlands would be impacted by the proposed abandonment in place. All surface water crossings would be purged with nitrogen. The EPA recommended that water resources be discussed in the EA. However, there are no wetlands on access roads that would be used during abandonment activities.
- Wildlife, Vegetation, and Invasive Species – there would be minimal ground disturbance, all activities would occur within the existing permanent right-of-way. The EPA recommended that we address invasive species in our EA. Questar’s maintenance would include monitoring and control of noxious weeds. And we find it adequate.

1. Threatened and Endangered Species

Questar on behalf of FERC consulted with the U.S. Fish and Wildlife Service (FWS) in Phoenix, Arizona about the potential occurrence and location of federally listed species in the Project area. In a letter dated March 20, 2018, the FWS stated that it coordinated with the Carlsbad and Palm Springs, California offices and assumed the lead responsibility for review of the Project. No ground-disturbing activities would occur in California and all work in Arizona would occur in previously disturbed areas that do not contain habitat for any federally listed species. The abandonment activities would not affect Mohave desert tortoise critical habitat. Hence, we have determined that the implementation of this Project would have no effect on any federally listed species or critical habitat, or specifically to the Mohave desert tortoise and its critical habitat. FWS stated that no further consultation is required. We concur.

2. Cultural Resources

Since all activities are confined to previously disturbed areas, Questar did not conduct cultural resources surveys. In letters dated December 21, 2017, Questar consulted with the Arizona, California, New Mexico, and Utah State Historic Preservation Offices (SHPO) about the Project. In letters dated January 23, 2018, January 30, 2018, February 1, 2018, the California, Utah, and Arizona SHPOs, respectively, concurred that no historic properties would be affected. In a letter dated January 25, 2018, the New Mexico SHPO stated that the Project would have effects on historic properties. On March 6, 2018, Questar asked the New Mexico SHPO to clarify their comments regarding effects. No additional documentation has been filed by Questar.

On December 21, 2017, Questar sent letters to 44 federally recognized tribes. We sent copies of the NOI to the same tribes. No comments were filed with the Commission, however, Questar received the following correspondence from the tribes. The Augustine Band of Cahuilla Indians, Pala Band of Mission Indians, Ricon Band of Luiseño Indians, and San Manuel Band of Mission Indians stated that the Project was outside their area of interest. The Morongo Band of Mission Indians requested cultural resources record search and available survey reports. The Twenty-Nine Palms Band of Mission Indians noted multiple areas of concern and requested to be notified about Project impacts and available cultural resources survey reports for the Essex Meter Facility, Sunflower Road Block Valve, North Needles Meter Station and Block Valve, Mohave Valley CS, Black Mountain Block Valve, and the Griffith Tap. The Soboba Band of Luiseño Indians responded noting the Project is in proximity to known resources and requested to be notified of any new developments in the Project and unanticipated discoveries of cultural resources. Additionally, they requested to monitor any ground disturbance for the Project and modifications to the unanticipated discovery plan (UDP). Questar filed a revised UDP to address some of these concerns and notifications of tribes.

Questar filed an UDP for Cultural Resources or Human Remains for California and Arizona. We find these plans acceptable.

Questar consulted with the Arizona, California, and Utah SHPOs regarding the potential effects on cultural resources, and they concurred that the Project would have no effects on historic properties. We agree. However, consultation with the New Mexico SHPO is incomplete.

Compliance with Section 106 of the NHPA has not been completed for the Project. To ensure that the FERC's responsibilities under the NHPA and its implementing regulations are met, **we recommend that:**

- Questar should **not begin** ground disturbance and/or use of any staging, storage, or temporary work areas and new or to-be improved access roads **until**:
 - a. Questar files with the Secretary of the Commission (Secretary):
 - i. reports, studies, or plans of additional cultural resources surveys;
 - ii. site-specific avoidance and/or treatment plan(s), as required; and
 - iii. comments on reports and plans from the New Mexico SHPO
 - b. the Advisory Council on Historic Preservation is afforded an opportunity to comment if historic properties would be adversely affected; and
 - c. the FERC staff reviews and the Director of the Office of Energy Projects (OEP) approves the cultural resources reports and plans, and notifies Questar in writing that avoidance and/or treatment measures, as required, may be implemented and/or construction may proceed.

All materials filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: “CUI//PRIV – DO NOT RELEASE”. Additionally, a letter must be filed public that states that these items have been filed PRIV.”

3. Land Use

The Project would affect a total of 27.2 acres. All ground disturbance would be limited to Questar’s existing permanent right-of-way or existing easements, and would occur within the existing Project site property or easement boundaries, access roads, and temporary work space at the Essex Meter Station facility.

None of the following designated areas would be disturbed by the abandonment activities:

- lands owned or controlled by private preservation conservation groups;
- wild and scenic rivers;
- Coastal Zone Management Areas;
- hazardous waste sites or landfills;
- recreation or public interest areas;
- special land use areas, such as orchards, nurseries, specialty crops, old-growth forests, etc.; or
- existing or planned developments.

We received one comment from Atkinson Trading Company, a landowner along the Questar pipeline that would be sold to NTUA, expressing concern regarding construction activities, access to the property, and eminent domain. The existing pipeline traverses land owned by Atkinson near Cameron, Arizona, pursuant to property rights that have been in place for decades. The sale of the relevant portion of the pipeline to NTUA would have no impact on the environmental resources because Questar has not proposed any construction in this area and facilities are already in operation. Therefore, we conclude that concerns regarding construction and eminent domain have been adequately addressed.

4. Air Quality and Noise

Air Quality

The Project would result in minor temporary impacts on overall air quality from equipment exhaust used during abandonment activities, worker commute exhaust, fugitive dust generation from travel on unpaved and paved roads, and fugitive dust generation from abandonment activities.

Ambient air quality is protected by federal and state regulations. The Clean Air Act (CAA) and its amendments designate six pollutants as criteria pollutants for which the National Ambient Air Quality Standards (NAAQS) are promulgated. The NAAQS for sulfur dioxide (SO₂), nitrogen dioxide (NO₂), particulate matter, including particulate matter less than 10 microns in aerodynamic diameter (PM₁₀) and PM less than 2.5 microns in aerodynamic diameter (PM_{2.5}), carbon monoxide, ozone, and lead were set by the EPA to protect human health (primary standards) and public welfare (secondary standards). The current NAAQS for these criteria pollutants are available on the EPA's website.⁴

Greenhouse Gases (GHG) produced by fossil-fuel combustion are carbon dioxide, methane (CH₄), and nitrous oxide. GHGs status as a pollutant is not related to toxicity. GHGs are non-toxic and non-hazardous at normal ambient concentrations, and there are no applicable ambient standards or emission limits for GHG under the CAA. GHGs emissions due to human activity are the primary cause of increased atmospheric concentration of GHGs since the industrial age. These elevated levels of GHGs are the primary cause of warming of the climatic system. During abandonment of the Project, these GHGs would be emitted from equipment. Emissions of GHGs are typically expressed in terms of carbon dioxide equivalents.

⁴ The current NAAQS can be accessed online at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

If measured ambient air pollutant concentrations for a subject area remain below the NAAQS criteria, the area is considered to be in attainment with the NAAQS. Table 5 below, breaks down the attainment status for each county the Project crosses.

Table 5: Attainment Status			
County	Facility	Attainment	Nonattainment
San Bernardino, CA ^a	Essex Meter Facility Sunflower Road Block Valve Water Road Block Valve North Needles Meter Station and Block Valve	O ₃ (1979), NO ₂ , CO, PM _{2.5} , SO ₂ , Pb	PM ₁₀ (1987), O ₃ (1997), O ₃ (2008) ^a
Mohave Valley, AZ	Mohave Valley CS Black Mountain Block Valve Griffith M&R Kingman Block Valve Hackberry Block Valve Fort Rock Road Block Valve	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
Apache, AZ	Red Mesa NTUA Tap Facility	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
Yavapai, AZ	Anvil Rock Road Block Valve Crookton Road Block Valve	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
Coconino, AZ	Ash Fork Block Valve Highway 64 Block Valve Highway 180 Block Valve Grey Mountain Block Valve Cameron CS	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
San Juan, UT	Red Mesa CS	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
San Juan, NM	Shiprock CS Blanco M&R Facility	O ₃ , NO ₂ , CO, PM ₁₀ , PM _{2.5} , SO ₂ , Pb	-
<p>a. Part of San Bernardino in nonattainment status for Ozone 2008</p> <p>O₃ = ozone NO₂ = nitrogen dioxide CO = carbon monoxide PM_{2.5} = particulate matter less than or equal to 2.5 microns in aerodynamic diameter SO₂ = sulfur dioxide Pb = lead PM₁₀ = particulate matter less than or equal to 10 microns in aerodynamic diameter</p>			

The CAA is the basic federal statute governing air pollution in the United States. We have reviewed the following federal requirements and determined that they are not applicable to the proposed Project:

- New Source Review;
- Title V;
- National Emissions Standards for Hazardous Air Pollutants;
- New Source Performance Standards;
- Greenhouse Gas Reporting Rule; and
- General Conformity of Federal Actions

In its comment, the EPA recommended the need to address ambient air conditions, NAAQS, nonattainment areas, general conformity requirements, and potential air quality impacts; these are addressed throughout the Air Quality and Noise section. A General Conformity determination is not required as the analysis is limited to nonattainment pollutants, to which, emissions are under the de minimis threshold.

During abandonment activities, a temporary reduction in ambient air quality may result from criteria pollutant emissions and fugitive dust generated by equipment needed for abandonment. The quantity of fugitive dust emissions would depend on the moisture content and texture of the soils that would be disturbed. Fugitive dust and other emissions due to construction activities generally do not pose a significant increase in regional pollutant levels; however, local pollutant levels could increase. Dust suppression techniques, such as watering the right-of-way may be used as necessary in construction zones near residential and commercial areas to minimize the impacts of fugitive dust on sensitive areas.

Crews would work simultaneously at several work sites for evacuating and blowdown of existing natural gas, nitrogen purging and packing, and cut and cap activities. These site activities include:

- Temporary compression and nitrogen generation for purge and pack of pipeline segment from Essex Meter Facility to the Grey Mountain Main Line block valve where the Questar side would be cut and a welded cap placed on the pipeline when purge is complete;
- Modifications to minor aboveground facilities at the Cameron Compressor Station, including closing the main line valve to allow for temporary compression to draw the line pack down from the Cameron Compressor Station to the Essex Meter Facility and vent the remaining natural gas on the pipeline segment to the atmosphere at the Mohave Valley Compressor Station and/or the Grey Mountain main line block valve;
- Place air movers at the Highway 180 Maine Line block valve and Cameron Compressor Station to remove all natural gas from this section of pipeline. Remove existing 16-inch block valve and 4-inch cross over piping and install weld caps on both ends of each at the Grey Mountain main line block valve;
- Purge the air from the pipeline with natural gas from the Cameron Compressor Station to the Grey Mountain Block Valve and pack this segment in accordance with NTUA operations;
- Remove temporary compression from the Essex Meter Facility and mobilize and

connect the trailer mounted nitrogen plant to begin pumping nitrogen into the approximately 219.5 miles of 16-inch-diameter pipeline from the Essex Meter Facility to the vent blow off at the Grey Mountain Main line block valve;

- Close inlet station valves and install blind flanges on the 12-inch flange connections utilized for purge and pack activities and install a weld cap on the 12-inch outlet piping at Essex Meter Facility once purge and pack activities are completed; and
- Close all main line block valves from the Grey Mountain Main Line block valve location to the Essex Meter Facility to help identify location of any potential nitrogen pack pressure loss on a given segment.

Air quality would be temporarily affected by the Project activities. Short-term emissions would be generated by operation of equipment, land disturbance, and increased traffic from worker and delivery vehicles for all locations. Following abandonment activities, there would be no long term operating impacts on air quality as sources would cease to operate following abandonment. Table 6 below presents emissions during abandonment activities.

Abandonment activities would be completed in accordance with all applicable requirements defined by the U.S. Department of Transportation and any additional applicable federal and state regulations. Once abandonment activity in an area is completed, the fugitive dust and equipment emissions would subside and revert to pre-construction conditions. Air quality impacts from construction equipment would be temporary and should not result in a significant impact on regional air quality.

Table 6: Total Project Emissions During Abandonment Activities								
Activity	NO_x	CO	VOC	PM₁₀	PM_{2.5}	SO₂	CO_{2e}	HAPs
Diesel non-road equipment	0.42	0.28	0.03	0.04	0.04	0.01	69	0.00
Diesel and gas on-road equipment	4.74	5.58	0.32	0.15	0.14	0.02	2,005	0.04
Fugitive dust	-	-	-	5.31	0.53	-	-	-
Temporary compressor engines	4.18	7.04	0.06	0.04	0.04	0.00	222	0.06
Venting operations	-	-	0.66	-	-	-	-	-
Total	9.34	12.90	1.07	5.54	0.75	0.03	2,293	0.10
NO _x = nitrogen oxides CO = carbon monoxide VOC = volatile organic compounds PM ₁₀ = particulate matter less than or equal to 10 microns in aerodynamic diameter PM _{2.5} = particulate matter less than or equal to 2.5 microns in aerodynamic diameter SO ₂ = sulfur dioxide CO _{2e} = carbon dioxide equivalents HAPs = hazardous air pollutants								

Noise

The Project would temporarily affect the local noise environment in the Project area. The Project does not involve the construction or use of any new permanent noise sources. Therefore, no operational noise impacts are anticipated.

The ambient sound level of a region, which is defined by the total noise generated within the specific environment, is usually comprised of sounds emanating from both natural and artificial sources. At any location, both the magnitude and frequency of environmental noise may vary considerably over the course of the day and throughout the week, in part due to changing weather conditions and the impacts of seasonal vegetative cover.

In 1974, the EPA published its Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Noise levels are expressed as decibels on the A-weighted scale (dBA) to put more emphasis on frequencies in the range that humans hear best. Because noise levels are perceived differently, depending on length of exposure and time of day, the day-night sound level (Ldn) takes into account the duration and time the noise is encountered. Specifically, the Ldn adds 10 dBA to nighttime sound levels between the hours of 10 p.m. and 7 a.m. to account for a people's greater sensitivity to sound during the night. The EPA has indicated that an Ldn of 55 dBA protects the public from indoor and outdoor activity interference. We have adopted this criterion and use it to evaluate the potential noise impacts from the proposed Project at noise sensitive areas, such as residences, schools, or hospitals. Also, in general, a person's threshold of perception for a perceivable change in loudness on the A-weighted sound level is about 3 dBA, whereas a 5 dBA change is clearly noticeable, and a 10 dBA change is perceived as either twice or half the loud.

The California Environmental Quality Act limits exposure of persons to excessive noise and vibration levels. Questar would comply with federal noise regulations, thus complying with all requirements of California Environmental Quality Act.

San Bernardino County, California identifies multiple noise requirements for stationary and mobile sources depending on land use and time of day. Sources of noise from temporary construction, maintenance, repair, or demolition activities between 7:00 a.m. and 7:00 p.m. are exempt. Questar would be performing work between 7:00 a.m. and 9:00 p.m. Any work performed outside of exemption times would meet the night time sound level, specified by the county, of 45 dBA.

Mohave County, Arizona prohibits loud and unnecessary noise, with exemptions for construction activities between 6:00 a.m. and sunset. Questar would not emit any noise above federal regulations, thus complying with this regulation.

Coconino County, Arizona states that no noise shall be generated by any use to the point of disturbing the peace. Questar would not emit any noise above federal regulations, thus complying with this regulation.

Needles City, California has noise requirements that would be applicable at North Needles meter station and block valve that limit noise levels at 45 dBA interior and 75 dBA exterior levels. Questar would not emit any noise above 45 dBA at the North Needles meter station and block valve to comply with this regulation.

Kingman City, Arizona has noise requirements that would be applicable at the Kingman block valve that prohibits loud and disturbing noise. Construction activities are exempt between the hours of 6:00 a.m. and sunset. Questar would not emit any noise above federal regulations, thus complying with this regulation.

There are no noise sensitive areas within 0.5-mile of any Project site, therefore, no significant noise impacts are expected to occur.

Abandonment of the facilities would involve operation of general construction equipment and noise would be generated during the removal of the Project components. Measures to mitigate construction noise would include compliance with federal regulations limiting noise from trucks, proper maintenance of equipment, and ensuring that sound muffling devices provided by the manufacturer are kept in good working condition.

Abandonment activities would be limited to daytime hours. Post abandonment, there would be no sources for operational noise at the Project site. Once the abandonment activities are completed, the construction noise would subside. We conclude that the Project would not result in significant noise impacts in the area.

5. Reliability and Safety

The transportation of natural gas by pipeline involves some risk to the public in the event of an accident and subsequent release of gas. The greatest hazard is a fire or explosion following a major pipeline rupture. Methane, the primary component of natural gas, is colorless, odorless, and tasteless. It is not toxic, but is classified as a simple asphyxiate, possessing a slight inhalation hazard. If breathed in high concentration, oxygen deficiency can result in serious injury or death.

The pipeline and aboveground facilities associated with the Project must be designed, constructed, operated, and maintained in accordance with the U. S. Department of Transportation Minimum Federal Safety Standards in 49 CFR Part 192. The regulations are intended to ensure adequate protection for the public and to prevent natural gas facility accidents and failures.

The U. S. Department of Transportation pipeline standards are published in Parts 190-199 of Title 49 of the CFR. For example, Part 192 of 49 CFR specifically addresses natural gas pipeline safety issues, prescribes the minimum standards for operating and maintaining pipeline facilities, and incorporates compressor station design, including emergency shutdowns and safety equipment. Part 192 also requires a pipeline operator to establish a written emergency plan that includes procedures to minimize the hazards in a natural gas pipeline emergency.

The operator must also establish a continuing education program to enable customers, the public, government officials, and those engaged in excavation activities to recognize a gas pipeline emergency and report it to appropriate public officials.

Questar would provide the appropriate training to local emergency service personnel before the abandonment activities begin.

The EPA submitted a comment stating that waste generation and removal be discussed. The Project is comprised entirely of abandonment by sale or abandonment in place; no physical removal activities would be performed, therefore, no waste types are expected. Questar's abandonment activities would have a minimum increase in risk to the public and we are confident that with the abandonment procedures outlined, that they would be constructed and operated safely.

6. Polychlorinated Biphenyl

Questar states that the removal of any existing piping or equipment that has been in contact with natural gas would be completed in accordance with the EPA issued polychlorinated biphenyl (PCB) rules and regulations contained within 40 CFR Part 761, as revised (CFR: June 29, 1998, Volume 63, No. 124). Questar would not conduct any cleaning of the abandonment in-place pipeline facilities. During abandonment activities, Questar would follow appropriate PCB testing and disposal procedures for abandonment, therefore, we conclude that PCB contamination would not be a significant risk.

7. Cumulative Impacts

In accordance with NEPA and with FERC policy, we evaluated the potential for cumulative effects of the Project. Cumulative impacts represent the incremental effects of a proposed action when added to other past, present, or reasonably foreseeable future actions, regardless of the agency or party undertaking such other actions. Cumulative impacts can result from individually minor, but collectively significant actions, taking place over time.

This cumulative effects analysis generally follows a method set forth in relevant Council on Environmental Quality and EPA guidance and focuses on potential impacts from the proposed Project on resource areas or issues where the incremental contribution would be potentially significant when added to the potential impacts of other actions. To avoid unnecessary discussions of insignificant impacts and projects and to adequately address and accomplish the purposes of this analysis, an action must first meet the following three criteria to be included in the cumulative analysis:

- affect a resource potentially affected by the Project;
- cause this impact within all, or part of, the Project's impact area; and
- cause this impact within all, or part of, the time span for the potential impact from the Project.

We assessed the potential cumulative effects for the abandonment activities of the Project and nearby projects for past, present, and reasonably foreseeable actions. Questar's evaluation did not identify any projects that are planned for work or completion between 2017 and 2018 within one mile of the abandonment Project area. Therefore, we conclude that due to the limited workspace acreage and short abandonment activities

timing at each site, abandonment work would have limited temporary or no impact on water resources, wetlands, vegetation, wildlife, geology, soils, and land use.

The proposed Project would not contribute to direct or indirect cumulative impacts of air quality or noise as the project is entirely abandonment by sale or abandonment in place. Any emissions generated by the abandonment activities would be short term and would not have a long term affect on local air quality conditions or noise levels.

C. ALTERNATIVES

In accordance with NEPA and Commission policy, we considered and evaluated alternatives to the proposed action, including the no-action alternative. The no-action alternative would involve the continued operation of the Project; however, the Project objectives would not be met. Questar's purpose for the Project is to eliminate future operations and maintenance needs for what it asserts is an underutilized system. If the pipeline facilities were to remain in service, Questar states it would continue to reduce and then end service due to the increasing cost of operating and maintaining the pipeline. Therefore, we do not recommend this alternative. No other system alternatives, facility alternatives, or alternative facility locations and pipeline alignments necessitate analysis due to the nature of the abandonment proposal. We conclude that the proposed Project is the preferred alternative to meet the Project objectives.

D. CONCLUSIONS AND RECOMMENDATIONS

Based on the analysis in this EA, the mitigation measures proposed in the application, and with the implementation of our recommendations below, the OEP staff has determined that approval of this proposal would not constitute a major federal action significantly affecting the quality of the human environment. We recommend that a finding of no significant impact be included in the Commission's order and the following mitigation measures be included as conditions to the authorization.

1. Questar shall follow the construction and abandonment procedures and mitigation measures described in its applications and supplements including responses to staff data requests and as identified in the EA, unless modified by the Order.
Questar must:
 - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary;
 - b. justify each modification relative to site-specific conditions;
 - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
 - d. receive approval in writing from the Director of OEP **before using that modification.**

2. The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of all environmental resources during abandonment activities associated with the Project. This authority shall allow:
 - a. the modification of conditions of the Order;
 - b. stop-work authority; and
 - c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from Project abandonment activities.
3. **Prior to any abandonment activity**, Questar shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with abandonment and restoration activities.
4. The authorized abandonment locations shall be as shown in the EA, and as supplemented by filed alignment sheets. **As soon as they are available, and before the start of abandonment**, Questar shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all work areas approved for abandonment by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.
5. Questar shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all facilities, staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction in or near that area**.

This requirement does not apply to extra workspace allowed by the Commission's *Upland Erosion Control, Revegetation, and Maintenance Plan* and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
- b. implementation of endangered, threatened, or special concern species mitigation measures;
- c. recommendations by state regulatory authorities; and
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

6. Within 60 days of the acceptance of the authorization and before construction begins, Questar shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP. Questar must file revisions to the plan as schedules change. The plan shall identify:

- a. how Questar will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
- b. how Questar will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- c. the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
- d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
- e. the location and dates of the environmental compliance training and instructions Questar will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);
- f. the company personnel (if known) and specific portion of Questar's organization having responsibility for compliance;
- g. the procedures (including use of contract penalties) Questar will follow if noncompliance occurs; and
- h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:

- i. the completion of all required surveys and reports;
 - ii. the environmental compliance training of onsite personnel;
 - iii. the start of construction; and
 - iv. the start and completion of restoration.

- 7. Questar shall employ at least one EI for the Project. The EI shall be:
 - a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
 - b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
 - c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
 - d. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
 - e. responsible for maintaining status reports.

- 8. Beginning with the filing of its Implementation Plan, Questar shall file updated status reports with the Secretary on a **monthly** basis until all abandonment activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:
 - a. an update on Questar's efforts to obtain the necessary federal authorizations;
 - b. the abandonment status of the Project, work planned for the following reporting period, and any schedule changes in other environmentally-sensitive areas;
 - c. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
 - d. a description of the corrective actions implemented in response to all instances of noncompliance;
 - e. the effectiveness of all corrective actions implemented;
 - f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and

- g. copies of any correspondence received by Questar from other federal, state, or local permitting agencies concerning instances of noncompliance, and Questar's response.
9. Questar must receive written authorization from the Director of OEP **before commencing any Project abandonment activities.** To obtain such authorization, Questar must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).
10. **Within 30 days of completing Project abandonment,** Questar shall file an affirmative statement with the Secretary, certified by a senior company official:
- a. that the facilities have been abandoned in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
 - b. identifying which of the conditions in the Order Questar has complied with or will comply with. This statement shall also identify any areas affected by the Project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.
11. Questar shall **not begin** ground disturbance and/or use of any staging, storage, or temporary work areas and new or to-be improved access roads **until**:
- a. Questar files with the Secretary:
 - i. reports, studies, or plans of additional cultural resources surveys;
 - ii. site-specific avoidance and/or treatment plan(s), as required; and
 - iii. comments on reports and plans from the New Mexico State Historic Preservation Officer;
 - b. the Advisory Council on Historic Preservation is afforded an opportunity to comment if historic properties would be adversely affected; and
 - c. the FERC staff reviews and the Director of OEP approves the cultural resources reports and plans, and notifies Questar in writing that avoidance and/or treatment measures, as required, may be implemented and/or construction may proceed.

All materials filed with the Commission containing **location, character, and ownership information** about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: **“CUI//PRIV – DO NOT RELEASE”**. **Additionally, a letter must be filed public that states that these items have been filed PRIV.”**

E. REFERENCES

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