APPENDIX C

Noxious Weed Management Plan

Prospector Pipeline Company
North Elko Pipeline

June 2012

TABLE OF CONTENTS

1 INTRODUCTION

1.1 Project Description

Prospector Pipeline Company (PPC) proposes to construct and operate an approximately 24 mile underground natural gas pipeline, to supply natural gas from the recently completed Ruby Pipeline for delivery to the Barrick Goldstrike Mine. The pipeline, referred to as the North Elko Pipeline Project (NEPP), would be located on BLM and private lands in Elko and Eureka counties, Nevada. The proposed route of the pipeline is shown in Figure 1-1, Project Location and Figures 2-1 and 2-2 of the Environmental Assessment (EA).

1.2 Plan Purpose

The purpose of this plan is to prescribe methods to prevent, mitigate, and control the spread of noxious and invasive weeds before, during and after construction of the Project. PPC and its contractors would be responsible for carrying out the methods described in this plan. This plan is applicable to the construction and operation of the Project.

The practices described in this plan for survey, treatment and monitoring for noxious weed control for the Project described in this plan have been developed in coordination with the Elko District Noxious Weed Specialist and are in accordance with the BLM Elko Field Office Programmatic Environmental Assessment of Integrated Weed Management on Bureau of Land Management Lands (1998), and Nevada Revised Statutes Chapter 555—Control of Insects, Pests and Noxious Weeds.

1.3 Goals and Objectives

The goal of the preventative and control measures outlined in this document is to minimize the spread of noxious weeds during the construction and operation of the Project.

PPC's objective is to assist the BLM in their noxious weed control efforts; to comply with requirements designed to prevent the spread of noxious weeds as a result of the NEPP; and to implement weed control measures on PPC's areas of soil disturbance including the temporary rights-of-way and staging areas. In carrying out these measures, PPC would identify specific locations of noxious weed infestation, treat and monitor the treatment for the life of the project.

Monitoring during the construction and operation of the Project would include identification of any local areas on and immediately adjacent to the Project ROW and staging areas that may experience infestation. An evaluation of the efficiency of the prescribed control measures would also be implemented during the operational phase as described in the Reclamation Plan.

2 Noxious and Invasive Weed Management

Noxious and invasive weeds are opportunistic and often exotic plant species that readily invade disturbed areas. This invasion may prevent native plant species from establishing functioning plant communities. If these invasions are left untreated the invasion may become permanent.

Federal Invasive Species Executive Order 13112 defines "control" as eradicating, suppressing, reducing, or managing invasive species populations; preventing spread of invasive species from areas where they are present; and taking steps such as restoration of native species and habitats to reduce the effects of

invasive species and to prevent further invasions (U.S. Federal Register 1999).

In January/February of 2012 PPC consulted with the BLM Elko District to request information regarding noxious weed species identified along the Project ROW, and any weed management requirements for the NEPP.

2.1 Noxious Weed Inventory

In Nevada, 48 species are officially designated as noxious weeds under the Nevada Control of Insects, Pests and Noxious Weeds Act (Nevada Revised Statutes: Chapter 555). A complete list can be found at http://agri.nv.gov/nwac/PLANT_NoxWeedList.htm. Species are classified as Category A (control required), Category B (control required in areas where not well established), and Category C (control at discretion of state officer).

The table below summarizes the known occurrences of noxious weeds and their Nevada management category within proximity of the NEPP alignment and staging areas pursuant to information obtained by the BLM and NEPP. The location of these species is displayed in Figure 3-5 of the EA.

Table 1 Known occurrence of noxious weeds in proximity to the NEPP.

Common Name	Scientific Name	Category
Scotch thistle	*Onopordum acanthium*	B
medusahead	*Taeniatherum caput-medusae*	B
hoary cress	*Cardaria draba*	C
spotted knapweed	*Centaurea masculosa*	A

Prior to construction for the Project, a noxious weed inventory would be conducted in the spring of 2012 to determine noxious weed occurrence within the proposed temporary rights-of-way and all staging areas including a 150 yard buffer for public lands. Data would be collected and logged using global positioning system (GPS) units and then would be plotted on United States Geological Survey 1:24,000 scale topographic maps.

PPC would submit draft inventory results to the BLM Noxious Weed Specialist within 2 weeks of completion of the survey. Draft inventory results would include a species list of noxious weeds encountered by Class, GPS coordinates of each encounter location and encounter locations displayed on 1:24,000 scale topographic maps.

All noxious weeds within these areas will be controlled, however, repeated control measures are generally not considered to be effective in areas along or adjacent to the Project ROW where invasive weed species are already established and abundant. For example, it is recognized by the BLM, and other agencies that the widespread distribution of some non-native species such as cheatgrass (*Bromus tectorum*) and weeds not listed as noxious precludes the possibility of general control.

2.2 Noxious Weed Management

The following sections outline PPC's approach to identifying problem areas, preventative strategies, and treatment measures for noxious weeds.

2.2.1 Identification of Problem Areas

In the spring of 2012, PPC's qualified botanist would identify noxious weed occurrence and density along the Project area's ROW, staging areas inclusive of a 150 yard buffer on public lands.

Prior to construction, PPC would provide its contractors with information and training regarding noxious weed management, weed identification, and the impacts of such weeds on agriculture, livestock, and wildlife. The contractors would be informed of the importance of preventing the spread of noxious weeds in areas not infested and of controlling the proliferation of weeds already present.

Prior to construction, noxious weed locations would be identified and flagged in the field by PPC's botanist. These locations would include noxious weed species that require treatment or pre-treatment as determined in consultation with the BLM. The flagging would alert construction personnel to the infestation and prevent significant ground disturbance until noxious weed preventive measures (outlined below) have been implemented. These areas would be treated prior to or during construction using methods described in section 2.2.3.

2.2.2 Environmental Protection Measures/Design Features

PPC recognizes that prevention is the most cost-effective approach to noxious weed management. PPC would provide noxious weed control measures within their right of way and associated disturbed areas; comply with preventative requirements; and implement weed control measures on areas of the Project identified to be of concern. The following measures would be implemented to prevent the spread of noxious weeds:

- PPC would educate all Project personnel regarding environmental concerns and requirements, including weed identification, prevention, and control methods. No personnel would be allowed to enter the Project ROW before taking part in the pre-construction environmental information meeting at any point during the Project. Qualified environmental inspectors approved by BLM would be used to conduct the pre-construction environmental information meeting and conduct on-site biological monitoring before and during construction and reclamation, and annually during operation.
- Prior to construction mobilization, PPC would contract with a qualified botanist to complete an inventory of the Project rights-of-way and staging areas both inclusive of a 150 foot applicable on public lands to determine the location, extent and population characteristics for noxious weed species.
- Based on those survey results, in cooperation with the BLM Noxious Weed Specialist, PPC would refine/revise the Noxious Weed Management Plan (NWMP) as necessary to address site and species specific treatments.
- All herbicide applications would be conducted by a Nevada licensed applicator.
- PPC would limit the extent of surface disturbance to that necessary to construct and install the NEPP.
- In cooperation with the BLM Weed Specialist, PPC would conduct ground disturbing activities in a manner that includes project area pretreatment measures to preclude spread of noxious weeds from the project area to unaffected adjacent areas.
- Construction methods for the NEPP would include the following: Prior to entering the Project Area, all vehicles and construction equipment would be washed to remove dirt, debris and plant materials to minimize the spread of weed materials.
- All vehicle and equipment cleaning will occur offsite with two exceptions: 1) the heavy equipment

utilized to remove the noxious weed infested dirt can be washed on site with the location being reported to the BLM. 2) NEPP may conduct on site cleaning if they provide a system capable of collecting all of the dirt and debris for offsite disposal.

- PPC's contractor would develop a 'sticker' program to identify all vehicles and equipment that have successfully been cleared of noxious weeds. Vehicles and equipment without the proper stickers would be barred from entering new areas until cleaned of noxious weeds.
- Cleaning would be carried out using power or high-pressure equipment to remove seeds, roots, and rhizomes from the equipment before transport off site. Cleaning would concentrate on tracks or tires and on the undercarriage, with special emphasis on axles, frames, cross members, motor mounts, the underside of running boards, and front bumper/brush guard assemblies. If the weather conditions and ROW conditions are dry, compressed air would be used to clean vehicles and equipment. If muddy conditions exist, a mat platform with containment would be set up and the vehicles and equipment would be cleaned with high pressure water.
- Vehicle cabs would be swept out and refuse disposed of in waste receptacles. The contractor would ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads.
- During construction, PPC would dedicate one piece of equipment to excavate weed affected soils for stockpiling and for backfill of weed-affected soils. The equipment may be used elsewhere on the project after washing.
- In areas where infestations were identified in the field, the contractor would stockpile cleared vegetation and salvaged topsoil adjacent to the area from which they were stripped to eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes. Weed-infested stockpiles would be marked with clearly visible flagging until reclamation, when the contractor would return topsoil and vegetative material from infestation sites to the areas from which they were stripped. In addition, the contractor would not be permitted to move soil and vegetative matter outside of the identified and marked noxious weed infestation areas.
- The contractor would ensure that straw or hay bales used for sediment barrier installations or mulch distribution were weed-free. If weed free bales were unavailable, alternative weed free sediment barrier installations such as coir logs would be utilized.
- PPC would reclaim and seed all disturbed ground concurrent with ground disturbing activities in accordance with the Reclamation Plan (Appendix A of the EA). After, construction is done and reclamation completed, there would be no other disturbances planned during the life of the project. Monitoring for reclamation success would ensure adequate vegetative cover to prevent the invasion of noxious weeds.

2.2.3 Treatment Methods

PPC would implement noxious weed control measures in accordance with existing regulations and BLM requirements. PPC would focus on noxious weed control emphasizing areas containing species specifically requiring treatment, per BLM discussions. The Project would coordinate with the BLM Noxious Weed Specialist to determine which of the species determined to be located within the Project area would require treatment and/or treatment schedules.

It should be noted that the occurrence of many noxious and/or invasive weed species within the vicinity of the Project, is to an extent that eradication would not be possible unless performed on a scale well

beyond that of the Project construction. With this in mind, preventative measures outlined in section 2.2.2 would be implemented for such species, however PPC proposes no site specific treatment for these broadly distributed species located outside the Project area as defined by the NWMP. PPC's long term approach to effective noxious weed control is addressed in the Project's Reclamation Plan, which provides details of the proposed reclamation, seeding and monitoring activities following construction.

The following treatment measures would be implemented to prevent the spread of noxious weeds.

- PPC would implement and monitor the implementation of the Environmental Protection Measures/Design Features (Section 2.2.2).
- Based on the results of the spring 2012 Draft Noxious Weed Inventory Report, PPC would coordinate closely with the BLM Noxious Weed Specialist to determine if preconstruction herbicide treatment is necessary. If necessary, in compliance with the Elko Field Office Programmatic Environmental Assessment of Integrated Weed Management on Bureau of Land Management Lands, PPC and the TFO Specialist will revise this plan to contain:
    - Specific locations that require pre-construction herbicide treatment
    - Specific formulations of herbicide approved for use on BLM lands
    - Specific application rates and application timing for specified herbicides approved for use on BLM lands.
    - All herbicide applications will be conducted by a Nevada licensed application for treatment of noxious weeds
    - PARS (pesticide application records) will be completed within 24 hours of any application of herbicides and will be submitted to the BLM Noxious Weed Specialist within 2 weeks of all herbicide applications.
    - All herbicide applications will be conducted in accordance with all applicable rules, laws and regulations regarding the application of herbicides in the state of Nevada and on public lands administered by the BLM.
- Herbicide treatments would not be conducted during precipitation events or when precipitation is expected within 24 hours. If weeds targeted for herbicide treatments are found in the vicinity of sensitive sites, proper buffers would be used to prevent the spread of herbicides to these areas. PPC would consult with the BLM for additional support regarding noxious weed control issues that may occur during the pipeline operations.
- Pre-construction herbicide treatments would only be used in areas specifically identified by the BLM in coordination with PPC.

Bare Ground Treatments

At the Willow Creek and Goldstrike Meter Stations and the Coyote Creek Main Line Valve Station, the area prescribed in the EA to accommodate pipeline facilities would be grubbed and cleared of all vegetation. Soil sterilant such as Diuron or Imazapyr (to be approved by the BLM), would be applied by a Nevada certified applicator. The entire area to be fenced would be lined with a heavy duty (3 ounce) weed barrier such as DeWitt Company Typar®. Installation would be conducted in accordance with the manufacturer's recommendations. The installed weed barrier would be top-dressed with 4-8 inches of gravel.

Bare ground treatment areas would be inspected annually for integrity of the weed barrier and establishment of vegetation within the gravel cover. If at any time during the life of the project, the weed barrier integrity is found to be degraded by evidence of any vegetation perforating the barrier or vegetation becoming established in the gravel layer, PPC would revise this plan in coordination with the

BLM to include herbicide treatment of the subject bare ground treatment area.

Vegetated Ground Treatments

Within the Project area including staging areas and a 150 yard buffer on public lands mechanical treatment as follows would be applied.

At each noxious weed encounter location, staking and flagging will be installed for colonies with boundaries, and pin flags of the same color as the flagging will be installed for individual plants. Within areas to be disturbed by construction PPC would dedicate one piece of equipment to excavate weed affected soils for stockpiling and for backfill of weed-affected soils. The equipment may be used elsewhere on the project after washing.

In areas where infestations were identified in the field, the contractor would stockpile cleared vegetation and salvaged topsoil adjacent to the area from which they were stripped to eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes. Weed-infested stockpiles would be marked with clearly visible flagging until reclamation, when the contractor would return topsoil and vegetative material from infestation sites to the areas from which they were stripped. In addition, the contractor would not be permitted to move soil and vegetative matter outside of the identified and marked noxious weed infestation areas.

Within areas not be disturbed by construction the flagging and in flags will serve as a "no entrance zone" either on foot or otherwise. The NEPP disturbance area by design will be restricted to the temporary ROW and the staging areas for both public and private lands.

Given that construction is scheduled to begin August 1 which is post seed dispersal for most plants, herbicide treatment methods are not likely to be used within the temporary ROW on public and private lands and the 150 yard buffer on public lands. However, based on the results of the spring 2012 Draft Noxious Weed Inventory Report, PPC would coordinate closely with the BLM Noxious Weed Specialist to determine if preconstruction herbicide treatment is necessary.

Post-reclamation Methods

Treatment methods other than herbicide application, such as mechanical and enhancement measures, would be employed during the reclamation process to facilitate noxious weed control. The clearing, grading where necessary and trenching of the Project ROW, combined with successful reclamation and monitoring, would effectively combat noxious weeds and provide native vegetation a higher potential to out-compete weed species. Additionally, during years of higher-than-average rainfall, noxious weeds can appear in greater numbers than normal. For these reasons, reclamation (through clearing, preparing seedbeds, and seeding of species) of areas containing broadly occurring invasive species is the preferred measure (detailed reclamation measures are described in PPC's Reclamation Plan).

Post-construction and reclamation control measures to possibly be employed during monitoring for reclamation success may include one or more of the following methods:

- **Mechanical methods** would use hand held equipment to remove the top growth off of noxious weed species. Subsequent over-seeding would be conducted as soon as possible following top growth removal to enhance native species competition. Application of mechanical methods would not be conducted in native habitat areas.

- **Herbicide application** is an effective means of reducing the size of noxious weed populations. Herbicide application would be limited to the three fenced facilities locations.

2.2.4 Reclamation Methods

Reclamation activities would follow the progress of construction. Reclamation and seeding is addressed in the Reclamation Plan (Appendix A of this EA). Of significant importance to weed control is the need to re-seed areas as soon as possible following site disturbance. Quickly reseeding these areas would reduce the potential for noxious weed invasion.

Specific formulations of herbicide to be used, if necessary will be in compliance with the BLM Elko District EA and will be approved for use prior to any application of herbicides.

2.2.4.1 Private Landowner Requirements

There are no unique or land owner specific requirements known at the time of writing of this NWMP.

3.0 MONITORING

Monitoring of noxious weeds would be conducted as part of reclamation monitoring specified in the Reclamation Plan. In all areas affected by Project construction, noxious weeds will be monitored for on an ongoing basis as described in the Reclamation Plan. If infestations of noxious weeds are noted during monitoring activities, site specific treatment methods would be developed by PPC and the BLM. Treatments could include: over-seeding of the areas after noxious weed treatment using methods including herbicide application, and mechanical control.

In the event of an infestation, the monitoring schedule described in the Reclamation Plan may become more frequent, if deemed necessary by the BLM. Small infestations are likely to be locally treated with herbicide applications, with a focus on treating individual plants. In the event that a large infestation occurs or reoccurs, an evaluation would be performed to determine what led to the infestation, and a new strategy may be implemented. This evaluation would be made available to relevant local noxious weed supervisory authorities.

3.1 Reclamation Monitoring

The overall purpose of a monitoring program is to document whether areas that have been restored are progressing toward the long-term goal of soil stability, appropriate (noxious-weed free) vegetative cover and diversity, and habitat replacement. PPC intends to begin monitoring during the first growing season following construction. Monitoring would be carried out as described in the Reclamation Plan.

For all construction spreads, reclamation and associated noxious weed monitoring would begin in the spring of 2013 following 2012 construction.

3.2 On-going Monitoring

PPC would maintain ongoing communication with individual land owners, counties, and the BLM regarding noxious weeds within their respective jurisdictions. These parties may also contact PPC to report the presence of noxious weeds. PPC would control all noxious weeds found on BLM lands and include a summary of actions taken in the Reclamation Plan Monitoring Report for that period. PPC

would provide training for the annual visible pipeline inspector for the identification of noxious weed species. The pipeline inspector would contribute to monitoring reports by documenting noxious weeds observed during normal annual inspections. In this way, the Project ROW would be monitored on an ongoing basis.

4.0 HERBICIDE APPLICATION, HANDLING, SPILLS, & CLEANUP

4.1 Herbicide Application and Handling

Herbicide application would be conducted according to the rules, laws and regulations of the BLM and the Nevada Department of Agriculture, (NRS Chapter 555). A Nevada certified applicator would perform the application in accordance with applicable laws and regulations. No treatments will occur without prior coordination with and concurrence of the BLM and affected private landowners.

All herbicide applications would follow U.S. Environmental Protection Agency label instructions. Application of herbicides would be suspended if any of the following conditions existed:

- Wind velocity exceeds 10 miles per hour (mph) during herbicide application
- Snow or ice covers the foliage of noxious weeds; or
- Precipitation is occurring or imminent.

Vehicle-mounted sprayers (e.g., handgun or boom) would be used mainly in open areas that are readily accessible by vehicle. Hand-application methods (e.g., backpack spraying) that target individual plants would be used to treat small or scattered weed populations in rough terrain. Calibration checks of equipment would be conducted at the beginning of spraying and periodically to ensure that proper application rates were achieved.

Herbicides would be transported to the Project site daily with the following provisions:

- Only the quantity needed for that day's work would be transported;
- Concentrate would be transported in approved containers only, in a manner that would prevent tipping or spilling, and in a compartment isolated from food, clothing, and safety equipment;
- Mixing would be done off site and at a distance greater than 200 feet from open or flowing water, wetlands, or other sensitive resources. No herbicides would be applied at these areas unless authorized by appropriate regulatory agencies; and
- All herbicide equipment and containers would be inspected for leaks daily.

4.2 Herbicide Spills and Cleanup

All reasonable precautions would be taken to avoid herbicide spills. In the event of a spill, cleanup would be immediate. Nevada State certified applicators would keep spill kits in their vehicles and in herbicide storage areas to allow for quick and effective response to spills. Items to be included in the spill kit are:

- Protective clothing and gloves;
    - Adsorptive clay, "kitty litter," or other commercial adsorbent;
    - Plastic bags and bucket;
    - Shovel;

- Fiber brush and screw-in handle;
- Dust pan;
- Caution tape;
- Highway flares (use on established roads only); and
- Detergent

Response to an herbicide spill would vary with the size and location of the spill, but general procedures would include:

- Controlling traffic,
- Dressing the clean-up team in protective clothing,
- Stopping the leaks,
- Containing the spilled material,
- Cleaning up and removing the spilled herbicide and contaminated adsorptive material and soil, and
- Transporting the spilled pesticide and contaminated material to an authorized disposal site.

4.3 Worker Safety and Spill Reporting

All herbicide contractors would obtain and have readily available copies of the appropriate material safety data sheets for the herbicides used. All herbicide spills would be reported in accordance with applicable laws and requirements.