

**United States Department of the Interior
Bureau of Land Management**

**Decision Record
Environmental Assessment
DOI-BLM-UT-G021-2013-063-EA**

September 5, 2014

Wildcat Loadout Modification

Location: *Consumers Road, Carbon County, Utah
Section 33, Township 13 South, Range 9 East, SLBM*

Applicant/Address: *Intermountain Power Agency
10653 South River Front Parkway, Suite 120
South Jordan, Utah 84095*

U.S. Department of the Interior
Bureau of Land Management
Price Field Office
125 South 600 West
Price, Utah 84501
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DECISION RECORD
Environmental Assessment
DOI-BLM-UT-G021-2013-063-EA
Wildcat Loadout Modification

This document records the decision made by the Bureau of Land Management (BLM) for managing public lands associated with an existing right-of-way (ROW). The project area is located in Carbon County, Utah.

Authorities: The authority for making this decision is found in Title V 1976 Federal Lands Policy and Management Act (FLPMA), and the 1970 National Environmental Policy Act (NEPA).

Public Involvement: The public was notified of the Proposed Action by posting details on the BLM Utah's Environmental Notification Bulletin Board (ENBB) on September 13, 2013.

Carbon County sent a letter dated September 23, 2013 in support of the project. One letter was received from the public concerning the Proposed Action on March 4, 2014. The subject of the comments and response is described in Section 1.7 of the EA.

An environmental assessment (EA) was prepared and made available for public review and comment. The public comment period for the EA was open from May 6, 2013 and extended until June 19, 2014. During this time, comments were received from 3 parties. Received comments and responses to those comments are included as Appendix F of the EA. Comments in common to multiple groups or individuals were combined into one comment, where applicable, and subsequently addressed in response. Comments that were not considered substantive, e.g. opinions or preferences, did not receive a formal response, but were considered in the decision-making process.

Consultation with the State Historic Preservation office resulted in a December 2, 2013 concurrence letter. Tribal notification letters were sent by BLM on September 19, 2013. The Hopi Tribe replied with a letter requesting consultation if any resources were identified in a cultural survey that may be impacted. A letter from the Paiute Tribe was received deferring to other tribes in the area.

Alternatives Considered: The Wildcat Loadout Facility was selected by the applicant as a central location for transporting oil from Central Utah and the Uintah Basin, as the most economical location, and as the site where the least disturbance would occur. Alternatives other than the No Action Alternative were dismissed because there were no feasible alternate locations or methods to meet the purpose and need for the Proposed Action, as described in the EA.

The No Action Alternative would result in denying the modification of the Wildcat ROW. Oil loading operations would continue within the existing Utah Railroad ROW. The number of tanker trucks unloading oil would continue at the rate of approximately 22 truckloads per day.

Marlin would continue to use mobile pumps and loading racks. Tanks would not be installed and the single loading track would remain. Additional oil beyond the facility's capacity to transfer to rail car would need to be stored in portable tanks or hauled to another facility to be loaded on to rail cars. The loadout site would be reclaimed according to the MRP filed with DOGM.

Decision

It is my decision to authorize a Federal Land Policy and Management Act (FLPMA) Title V right-of-way (ROW) to Intermountain Power Agency. This ROW authorizes the conversion of the area west of the existing mainline railroad from coal loading to waxy crude and non-waxy light sweet crude oil loading to rail car. This includes the removal of the inactive coal loading equipment, construction, operation, and maintenance of the facilities necessary for crude oil loading as proposed in the Plan of Development. The current IPA ROW expires in 2014 and will be renewed until 2034. The proposed use of the ROW will include the construction of permanent crude oil storage tanks, additional railroad tracks, and loading racks. This ROW will authorize transporting up to 20,000 barrels of crude oil per day.

The natural drainage to the west of the facility will be dammed upstream from the existing impoundment cells to capture precipitation runoff from undisturbed areas further up the drainage. A diversion ditch will be constructed from the dam then south along the west side of the facility and to the tributary of Garley Wash south of the facility.

The existing impoundment cells will be used to capture runoff from the area between the proposed dam and edge of the facility. The existing impoundment cell ponds, proposed diversion ditch, and proposed dam have been designed to hold runoff from a 100-year-24-hour precipitation event as well as runoff from typical precipitation events from flowing into the facility.

Two ponds will be constructed within the facility area to capture runoff from within the facility and prevent water and potential oil spills from flowing out of the facility. The ponds have been designed to capture runoff from a 100-year-24-hour precipitation event and will have a retention capacity greater than runoff volume from typical precipitation events. Both ponds will be lined with either a clay base or high-density polyethylene membrane. In the event that a major storm fills the ponds, water will be tested for quality and pumped into the proposed diversion ditch if the water meets the quality standards. The three existing culverts under the rail lines will be removed or plugged to prevent water from the west side of the facility from entering the east side.

The current Spill Prevention Control and Countermeasure Plan (SPCC) will be followed to protect the undisturbed areas from accidental spills. The plan will be available for review at the loadout site. Construction workers and employees of the operation will be instructed on the information contained in the SPCC plan. In the event of a spill or release of petroleum, procedures outlined in the SPCC Plan will be followed. The Bureau of Land Management (BLM) and the Utah Department of Environmental Quality, will be notified if the spill meets the definition of a hazardous waste as defined in 40 CFR 261. A Storm Water Pollution Prevention Plan has been developed and all procedures for spill prevention and response will be followed.

Phase 1 will include removal of the inactive coal loading equipment to provide an area for crude oil equipment and to install four permanent steel storage tanks, loading rail lines, truck unloading lanes, unloading racks and loading racks. The tanks will be single-walled with cathodic protection to minimize metal corrosion. The tanks will be grounded to prevent fire in the event of a lightning strike. The tanks will be painted with a BLM approved color. An earthen berm will be constructed around the tanks to ensure adequate capacity to capture the content of 1.5 times the amount of the largest tank for a total containment volume of 150,000 barrels. Steps will be installed over the berm to provide access to the tanks and piping. A layer of clay will be constructed to limit any spill seepage. Any spill will be addressed immediately including a possible shut down of operations during clean up and restoring the berms. The berm is the secondary containment to prevent possible spills from reaching the ponds.

Two of the tanks will have a storage capacity of 100,000 barrels (4,200,000 gallons) and two tanks will have a storage capacity of 20,000 barrels (840,000 gallons). The total storage capacity of this system will be approximately 240,000 barrels (10,080,000 gallons). The 100,000 barrel tanks will have a diameter of 146 feet and will be approximately 40 feet in height. The 20,000 barrel tanks will have a diameter of 70 feet and will be approximately 32 feet in height. Each tank will have a sealed, floating roof to prevent the escape of vapors. The tanks will contain coils for heating the oil during storage. Fluid or steam will be heated by engineered electric heating elements and will be pumped through pipes connected to the tank and coils within the tank. The fluid or steam will be cycled and not vented to the atmosphere.

A 5,000 gallon tank containing water with foam injection capabilities will be connected to the crude oil storage tank roof with pipes and pumps to provide fire suppressant. The pipes will have a connecting valve outside of the berm to allow additional suppressant from truck tanks.

Four truck unloading lanes will be located within the site disturbance on existing roadways. The unloading lanes will be asphalt leading to and from the truck unloading lanes. The area where the trucks unload will be in a sloped concrete containment area. Truck unloading racks will be constructed adjacent to the unloading lanes. Four and six inch piping and fixed pumps will be installed to transfer oil from the tanker trucks to the storage tanks through a closed system to prevent vapors from escaping. Up to four additional loading tracks will be constructed on the west side of the main rail line within the Utah Railway ROW and IPA ROW. One additional dual-sided railcar loading rack will be constructed adjacent to the loading tracks and will be connected to the tanks by four and six inch piping to create a closed system.

A smokeless, natural draft, air assisted, and enclosed vapor combustor will be installed to combust any vapors generated during the loading process. Two-inch vapor vent manifold piping will be installed from each railcar station to the combustor where the vapors will be destroyed to % 98 destruction efficiency.

Approximately twelve new light posts will be installed at the truck unloading lanes, tank area, and railcar loading tracks. The lighting fixtures will be a cut-off design to cast light downward and minimize light pollution. On the existing facility east of the railroad tracks, angled or hooded shields will be installed on stacker walkways and all conveyor belt lights to direct the light

toward the area requiring light and to minimize light emission in other directions. Lights that cannot be shielded due to safety reasons, e.g. the truck dump and radial stacker flood lights, will not have additional shields added but can be placed in a downward facing direction. A manual switch will be installed so the flood lights on the radial stackers and truck dump can be turned off when not needed.

A transformer substation will be installed adjacent to the southeast corner of the existing warehouse fence on the west side of the loadout facility. A 10,000 gallon self-contained diesel fuel tank will be installed adjacent to the truck unloading lanes. The tanks are designed and built with the fuel tank inside of a containment tank.

Phase 2 will be the construction of additional tanks to bring the storage volume to 350,000 barrels. Additional tanks will be of the same design and size of the tanks constructed during Phase 1.

Existing Conditions and Proposed Action

Existing Conditions	
Total Facility Surface Disturbance (Acres)	66.9
Traffic on Consumers Road	
Approximate Total Traffic on Consumers Road Daily	485
Approximate Total Traffic from Oil Tanker Trucks on Consumers Road Daily	44
Approximate Total Number of Lights (Not Shielded)	107
Permanent Oil Storage (bbls)	0
Proposed Action	
Surface Disturbance	
Diversion Ditch Proposed Surface Disturbance (Acres)	0.5
Diversion Ditch Proposed Reclamation (Acres)	0.3
New Disturbance Area for Equipment, Tanks, and Tracks (Acres)	0.0
Disturbance associated with Truck unloading lanes	0.4
Total Facility Surface Disturbance After Ditch Reclamation Including Existing Disturbance (Acres)	67.1
Traffic on Consumers Road	
Approximate Total Traffic on Consumers Road Daily	585
Approximate Total Traffic from Oil Tanker Trucks on Consumers Road Daily	144
Lighting	
Approximate Total Number of New Light Posts (Shielded)	12
Approximate Total Number of Shields Installed on Existing Lights	71
Approximate Total Number of Lights	119
Permanent Oil Storage (Thousand bbls)	350

Location of Wildcat Loadout:

T. 13 S., R. 9 E., Salt Lake Meridian, Carbon County, Utah
Section 33: SW $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$.

All surface disturbance associated with the coal loading area of the Wildcat Loadout Facility will be reclaimed by the ROW holder according to the Division of Oil, Gas, and Mining (DOG M) Mining and Reclamation Plan (MRP) once that area of the facility is no longer needed. The surface disturbance associated with the oil loading portion of the ROW will be reclaimed in

accordance with the MRP until DOGM no longer retains jurisdiction over the oil loading facility, at which time the site will be reclaimed by the ROW holder according to the Green River District Reclamation Guidelines.

Plan Conformance and Consistency

The proposed action has been reviewed and determined to be in conformance with the terms and conditions of the Resource Management Plan (RMP) as required by 43 CFR 1610.5.

This project is consistent with the objectives, goals, and decisions of the PFO Record of Decision and Approved Resource Management Plan. The Resource Management Plan (RMP) provides broad direction for the management of lands administered by the PFO and general discussions of associated environmental effects.

A specific Lands and Realty (LAR) goal of the Resource Management Plan is to *“Make public lands available through ROWs or leases for such purposes as transportation routes, utilities, transmission lines, and communication sites, in coordination with other resource goals.”*

The applicable objective is to *“Maintain availability of public lands to meet the habitation, cultivation, trade, mineral development, recreation, and manufacturing needs of external customers and the general public.”*

Management Decision LAR-28 states (BLM 2008, p. 120) *“Additional ROWs will be granted consistent with Resource Management Plan goals and objectives.”*

Land Use Plan Name: Price Field Office Resource Management Plan

Date Approved/Amended: October 31, 2008

It has also been determined by review of the RMP, that the Proposed Action would not conflict with other decisions throughout the Price Field Office RMP.

Rationale for Decision: Based on a review of the project described above and field office staff recommendations attached, I have determined that the project is in conformance with the land use plan and is excluded from further environmental analysis. It is my decision to approve the action as proposed, with the following stipulations and the terms and conditions in the grant document:

- Yearly monitoring for vegetation success and periodic inspections for noxious weeds on reclaimed areas will be completed by the ROW holder. If noxious weeds are found, a licensed herbicide applicator will use herbicide or mechanical treatments to remove the noxious weeds. Mechanical methods, i.e., hand pulling and cutting plants at ground level may be necessary if the weed population is near desirable plant species or water bodies.
- All vehicles and equipment will be power washed before transporting to the project area to prevent the spread of seed. Cleared vegetation and soil from an area known to have weeds will be stock piled in the immediate area and then replaced in the same area where

the soils and vegetation were prior to disturbance. The ROW holder is responsible for weed control within the ROW throughout the life of the project.

- An annual report showing the maximum daily loading rate for this facility will be submitted to the BLM.

Protest/Appeal Language: This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the enclosed Form 1842-001. If an appeal is taken, your notice of appeal must be filed in the office of the Authorized Officer at 125 South 600 West, Price, Utah 84501, within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (request) pursuant to regulation 43 CFR 2801.10 or 2881.10 for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

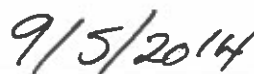
Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.



Authorized Officer
Ahmed Mohsen-Acting Field Manager



Date

**United States Department of the Interior
Bureau of Land Management**

**Finding of No Significant Impact
Environmental Assessment
DOI-BLM-UT-G021-2013-063-EA**

August, 2014

Wildcat Loadout Modification

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10653 South River Front Parkway, Suite 120
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FINDING OF NO SIGNIFICANT IMPACT
Environmental Assessment
DOI-BLM-UT-G021-2013-063-EA
Wildcat Loadout Modification

Based on the analysis of potential environmental impacts contained in the attached environmental assessment, and considering the significance criteria in 40 CFR 1508.27, I have determined that the Wildcat Loadout Modification will not have a significant effect on the human environment. An environmental impact statement is therefore not required.



Authorized Officer



Date

**United States Department of the Interior
Bureau of Land Management**

**Environmental Assessment
DOI-BLM-UT-G021-2013-063-EA**

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Wildcat Loadout Modification
DOI-BLM-UT-G021-063-EA

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Appendix B – Spill Prevention Control and Countermeasure Plan

Appendix C – Utah Pollution Discharge Elimination System Discharge Permit

Appendix D – Storm Water Pollution Prevention Plan

Appendix E – Hydrology Design

Appendix F – Response to Public Comments

Appendix G - Letter from the Corps of Engineers

Appendix H - Letter from the Department of Natural Resources

Wildcat Loadout Modification DOI-BLM-UT-G021-2013-063-EA

1.0 PURPOSE AND NEED

1.1 Introduction

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of the Wildcat Loadout Modification as proposed by Intermountain Power Agency (IPA). The EA is a site-specific analysis of potential impacts that could result with the implementation of a Proposed Action or alternatives to the Proposed Action. The EA assists the Bureau of Land Management (BLM) in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record (DR) may be signed for the EA approving the selected alternative, whether the Proposed Action or another alternative. A DR including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in the Price Field Office Record of Decision and Approved Resource Management Plan (RMP) (BLM, 2008a).

1.2 Background

The Wildcat Loadout Facility was first permitted by the BLM in 1982. IPA was granted Right-of-Way (ROW) UTU-48027 by the BLM in August, 2011, to operate the Wildcat coal preparation and loading facility on Federal land. The facility is located adjacent to Consumers Road approximately three miles west of Highway 6 in Section 33, Township 13 South, Range 9 East, SLBM, in Carbon County, Utah (see Figure 1). The west side of the facility has been inactive for several years. Associated Energy Services, LP/Marlin Logistics, LLC (Marlin) has been using the facility within the Utah Railroad ROW (UTSL-0-15794) for transloading oil from truck to rail car.

IPA proposes to modify the west area of the coal loading ROW for crude oil loading and establishing a long-term “landlord/tenant” lease with Marlin, thereby allowing Marlin or its affiliate NuDevco Midstream Development, LLC to expand the oil transloading operations beyond the Utah Railroad ROW. With the exception of a water diversion ditch, all construction and operations would be conducted on previously disturbed ground with no new disturbance area. The water diversion ditch would be constructed in the drainage west of the facility to divert precipitation runoff to the wash on the southern side of the facility. The expansion would include approximately 10 acres of the existing 250 acre ROW and possibly up to 20 acres in the future. Once the inactive coal loading equipment is removed, four sealed tanks capable of storing 240,000 barrels of oil would be installed initially. Additional tanks would be installed in the

future for a total storage capacity of 350,000 barrels. The tanks would be heated by electric heating elements to maintain lower viscosity of the product. Up to four additional loading tracks and a dual-sided rail car loading rack would be constructed to transfer oil from the storage tanks to rail cars. Four additional truck lanes, unloading racks, and pumps would be constructed for unloading oil from tanker trucks to the storage tanks. All oil transfers would be completed with a closed system to prevent spills and releasing volatile gas. A vapor combustor would be installed to combust any vapors generated during the transfer process.

Oil product from central Utah and the Uintah Basin would be transported by truck to the loadout facility, transferred to rail cars, and then transported to various customers. Initial output would be approximately 6,000 barrels per day and could increase to 20,000 barrels per day once the additional tanks are installed.

1.3 Purpose and Need for the Proposed Action

The purpose of the BLM's federal action is to respond to IPA's application to amend their existing ROW to allow oil transloading on portions of public lands.

The need for this action is to fulfill BLM's responsibility under FLPMA and BLM ROW regulations to manage the public lands for multiple uses and to consider approval of the application in a manner that avoids or reduces impacts to sensitive resource values associated with the project area and prevent unnecessary or undue degradation of public lands.

Marlin requires additional area outside of the current railroad ROW to install storage tanks, rail lines, and equipment for the purpose of increasing the volume of transported oil. Increasing the volume of oil transported by train provides a more economical alternative than transportation by tanker truck, less impacts to natural resources than transportation through pipelines, increases availability of oil, and decreases the United States' dependence on foreign energy. IPA has entered into an agreement to rent the western portion of the existing loadout facility to Marlin. Oil storage and loading are not included in the land use described in the current ROW. IPA needs to disclose the plans and agreements with Marlin so that the use, terms, and conditions of the ROW may be amended.

1.4 Conformance with BLM Land Use Plan(s)

The proposed project has been reviewed and determined to be in conformance with the objectives of the *Price Field Office Record of Decision (ROD) and Approved Resource Management Plan (RMP) (BLM 2008)* as stated on page 115 under Land and Realty (LAR):

Objectives

- "Maintain availability of public lands to meet the habitation, cultivation, trade, mineral development, recreation, and manufacturing needs of external customers and the general public"; and
- "Make public lands available to meet the needs for smaller ROWs".

It has also been determined by review of the RMP, that the proposed actions would not conflict with other decisions throughout the Price Field Office RMP.

1.5 Relationship to Statutes, Regulations, or Other Plans

The modification of the ROW by the BLM is pursuant to the requirements of Title 5 of the FLPMA, and regulations found within Title 43 of the Code of Federal Regulations (CFR), part 2800. The Proposed Action is consistent with Council for Environmental Quality (CEQ) regulations (40 CFR 1500-1508) and the Department of Interior Procedures for Implementing NEPA (43 CFR Part 46).

The area proposed for development is within lands designated for mining and grazing by Carbon County Planning and Building Department and the Proposed Action is in conformance with land use policies (Carbon County 2003).

The existing coal loadout facility is consistent with Utah Administrative Code Title 645.

1.6 Identification of Issues

Results of internal scoping and deliberation by the BLM Interdisciplinary Team (ID Team) identified relevant natural resources for analysis on a completed ID Team checklist (see Appendix A), documenting the issues considered and concerns expressed by resource specialists. The ID Team checklist is the foundation for the impact analysis in this EA. This section briefly describes the issues, concerns, and potential impacts identified by the ID Team as being potentially impacted by the Proposed Action.

1.6.1 Air Quality

- All construction activities would temporarily increase fugitive dust.
- Heavy machinery would emit Nitrogen Oxides (NO_x), volatile organic compounds (VOC), and Sulfur Oxides (SO_x).
- Gravel roadways would increase particulate matter (PM).
- The increase in vehicle travel, new storage tanks, machines, and all other operational equipment have the potential to emit PM, SO_x, NO_x, and VOCs.

1.6.2 Cultural Resources

- A Class III Cultural Resource Inventory is required pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800) and in coordination with the National Environmental Policy Act and its implementing regulations (40 CFR Part 1500 to 1508).

1.6.3 Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species

- The Proposed Action is located within crucial winter habitat for mule deer and elk.

- Increase in traffic along Consumers Road during crucial winter months could lead to impacts to mule deer and elk.

1.6.4 Invasive Species/Noxious Weeds

- Musk thistle, salt cedar, Russian thistle, and halogeton are present within the project area.

1.6.5 Threatened, Endangered, or Candidate Animal Species

- The Proposed Action is located within an area identified as containing winter and brooding habitat that may be suitable for greater sage-grouse.

1.6.6 Wastes (hazardous or solid)

- Potential impacts could result from a spill

1.6.7 Water Resources/Quality (drinking/surface/ground)

- Petroleum products, which if released could impact the water quality.

1.6.8 Vegetation Excluding USFW Designated Species and BLM Sensitive Species

- Existing vegetation may be disturbed through implementation of the Proposed Action.

1.6.9 Visual Resources

- The Proposed Action is within a Visual Resource Management (VRM) Class III area.
- The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

1.7 Public Concerns

On March 4, 2014, a comment was received from a member of the public. A concern was expressed about the safety of the Consumers Road from Highway 6/50 to the Wildcat Loadout Facility. The statement was made that Consumers Road needs to be fenced to keep livestock off of the road. Increased heavy truck traffic traveling to and from the Wildcat Loadout facility will cause increased risk and potential hazards to livestock grazing in the area.

Response: This concern will not be addressed further in Chapters 3 or 4 of this EA. The majority of the road, 11 miles, is on State and private lands, the BLM manages land that underlies 1 mile of this road and has no jurisdiction over State or private lands. The turn-off from Highway 6 for Consumers Road begins on private land and remains on private for approximately 1 mile, and then the road switches to State managed lands and remains on State for approximately 2 miles. The BLM portion then starts and is approximately 0.5 mile in length to the loadout. The trucks

would not be using the whole road (11 miles) but would turn off at the loadout. Fencing the portion of the road on BLM would not restrict livestock from the whole road, but only in that small portion and would not resolve the concern.

1.8 Summary

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction

The Wildcat Loadout Facility was selected as a central location for transporting oil from Central Utah and the Uintah Basin, as the most economical location, and as the site where the least disturbance would occur. Alternatives other than the No Action Alternative were dismissed because there were no feasible alternate locations or methods to meet the purpose and need for the Proposed Action.

2.2 Alternative A – Proposed Action

IPA currently maintains an approximate 250 acre ROW (UTU-48027) for the Wildcat Loadout utilized as a coal preparation and loadout facility for some of the mines located within Central Utah. The loadout facility is located on Federal land in Carbon County, Utah. The loadout facility is located in Section 33, Township 13 South, Range 9 East, SLBM. Approximately 12.5 of the 250 acres are under BLM ROW for the Utah Railway (UTSL-015794). The loadout site is permitted under Utah Division of Oil, Gas, and Mining (UDOGM) permit number ACT C/07/0033. The facility has three truck dumps, a unit train loading track, numerous conveyor belts, and structures to facilitate reclaiming, crushing, storing, and loading coal. The facility is connected with electric power and phone lines. All coal operations on the west side of the railway tracks ceased several years ago and the equipment is inactive.

Marlin Logistics LLC, purchases and markets locally produced crude oil. Crude oil is purchased at a crude oil lease wellhead or pad, transported by trucking companies, and delivered to Marlin terminals where the oil is loaded into Marlin railcars and transported to crude oil markets. Marlin is currently utilizing a portion of the Utah Railway ROW for the transfer of crude oil from tank trucks to railroad tank cars. The transfer of crude oil is presently entirely within the railroad ROW.

Approximately 80 percent of the crude oil transferred at the Wildcat Loadout is waxy crude that is semi-solid at temperatures below 160 degrees Fahrenheit. Approximately 20 percent of the crude oil transferred at the site is non-waxy light sweet crude. The non-waxy light crude oil is liquid petroleum that has a low density and flows freely at room temperature. It has a low viscosity, low specific gravity and floats on water. It generally has a low wax content but does contain varying amounts of wax. Light sweet crude oil is a high-quality, low-sulfur crude oil commonly used for processing into gasoline.

Eight mobile pumping stations are located along the railroad ROW to facilitate the transfer of oil from the trucks to the railcars. Trained and certified individuals unload trucks and load railcars to reduce the chance of spills or leaks. The railcars loaded with crude oil are then shipped to terminal refineries along the Gulf Coast, West Coast, and other locations within the rail road system. Once the railcars are emptied, they are returned for reloading.

IPA proposes to amend the use of a portion of the BLM ROW UTU-48027 to allow petroleum loading on the west portion of the loadout facility west of the centerline of the existing mainline

railroad line. IPA has a long-term “landlord/tenant” lease with Marlin to operate crude oil transloading operations at the Wildcat Loadout Facility. The current IPA ROW expires in 2014 and would be renewed until 2034. The proposed use of the ROW would require the construction of permanent crude oil storage tanks, additional railroad tracks, and loading racks in order to increase the output and efficiency of crude oil transport. The transloading facilities and operation would last as long as economically feasible, which is expected to continue for 20 or more years. Marlin has an encroachment permit for the use of Consumers Road for trucking oil into the loadout site. Carbon County’s road supervisor has indicated that this project would be approved by Carbon County.

The natural drainage to the west of the facility would be dammed upstream from the existing impoundment cells to capture precipitation runoff from undisturbed areas further up the drainage (see Appendix E, Hydrology Design). An application for a dam has been submitted and approved by the Utah Division of Water Rights (see Appendix H, Letter from the Department of Natural Resources dated August 4, 2014). A diversion ditch would be constructed from the dam then south along the west side of the facility and to the tributary of Garley Wash south of the facility.

The US Army Corps of Engineers concurred that the tributary is not a water of the US and no dredge and fill permit was required. A formal letter from the Corps confirming that no permit is required is included in Appendix G. The ditch would require approximately 0.5 acres of undisturbed ground. The existing impoundment cells would be used to capture runoff from the area between the proposed dam and edge of the facility (see Appendix E, Hydrology Design). The existing impoundment cell ponds, proposed diversion ditch, and proposed dam would be designed to hold runoff from a 100-year-24-hour precipitation event as well as runoff from typical precipitation events from flowing into the facility. The existing diversion ditch captures only a small amount of runoff from the draw and does not divert the runoff from the draw around the facility site. The existing diversion ditch is approximately 0.3 acres of disturbance that would be reclaimed according to the DOGM Mining and Reclamation Plan (MRP) until reclamation bonding can be transferred to the BLM ROW and would then be reclaimed according to the Green River District Reclamation Guidelines.

Two proposed ponds would be constructed within the facility area to capture runoff from within the facility and prevent water and potential oil spills from flowing out of the facility (Figure 3). The ponds have been designed to capture runoff from a 100-year-24-hour precipitation event and will have a retention capacity greater than runoff volume from typical precipitation events. The following tables were taken from data from the hydrology report included as Appendix E and show the runoff volume and the capacities of the proposed ponds and diversion ditch.

Table 2.2.1 – Runoff Calculations for Various Areas

Area	Peak Discharge (cfs)	Total Runoff Volume (ac-ft)
Diversion Ditch	36.57	2.83
Drainage Area #1 (South)	4.95	0.773
Drainage Area #2	3.54	0.25
Drainage Area #3 (North)	1.59	0.13

Table 2.2.2 – Retention Pond Capacities

Pond	Capacity (ac-ft)
Pond #1 (South)	0.849
Pond #2 (North)	0.157
Upper Cell (1)	0.437
Lower Cell (1)	1.114

One pond would be located south of the proposed truck unloading lanes and would capture runoff from the northern area. The other pond would be located near the existing refuse storage pile and would capture runoff from the southern area. Both ponds would be lined with either a clay base or high-density polyethylene membrane. In the event that a major storm fills the ponds, water would be tested for quality according to the UPDES permit and pumped into the proposed diversion ditch only if water meets the quality standards. The three existing culverts under the rail lines would be removed or plugged to prevent water from the west side of the facility from entering the east side. The existing ponds on the east side of the facility would remain and would be maintained according to standards outlined in the DOGM MRP.

The current Spill Prevention Control and Countermeasure Plan (SPCC) would be followed to protect the undisturbed areas from accidental spills (see Appendix B). The plan would be available for review at the loadout site. Construction workers and employees of the operation would be instructed on the information contained in the SPCC plan. In the event of a spill or release of petroleum, procedures outlined in the SPCC Plan would be followed. The BLM, as well as the Utah Department of Environmental Quality, would be notified if the spill meets the definition of a hazardous waste as defined in 40 CFR 261. A Storm Water Pollution Prevention Plan has also been developed (Appendix D) and all procedures for spill prevention and response within the plan would be followed.

Construction

Phase 1 of the Proposed Action would be to remove inactive coal loading equipment to provide an area for crude oil equipment and to install four permanent steel storage tanks, loading rail lines, truck unloading lanes, unloading racks and loading racks (see Figure 2). The tank area would be graded with a rubber-tired class RG 50 grader, and a 225 class trackhoe, 560 class backhoe loader, or similar equipment to excavate the tank footings. Each individual tank location would be excavated to approximately five feet deep. An engineered concrete foundation would be constructed for each tank. The reinforced one-foot-wide by three-foot-high footing below the frost line would support a nine-inch thick concrete wall that surrounds the area below the tank. The area within the surrounding wall would contain compacted fill. A rubber liner would be placed over the wall and fill. A reinforced concrete pad would be poured on top of the liner and would have an early leak detection feature. The pad surface would have several open notches radiating from the center of the tank pad, each leading to the outside diameter of the tank. In the event the bottom of the tank leaks petroleum, the spill would be immediately noticeable at the outside diameter of the tanks on top of the concrete pad within the designed notches. The rubber lining under the concrete tank pad would prevent any product from leaking through possible cracks in the concrete and seeping into the ground. Any leak through the concrete would flow to the perimeter of the liner where it could be detected. The tank bottoms would be approximately

12 inches above ground level. The tanks would be single-walled with cathodic protection to minimize metal corrosion. The tanks would be grounded to prevent fire in the event of a lightning strike.

The tank construction would be completed on site using a 30 or 60-ton crane, portable welding equipment, and scaffolding. Construction of all four tanks by six workers is expected to last four to eight months. The tanks would be painted with a BLM approved color. An earthen berm would be constructed around the tanks to ensure adequate capacity to capture the content of 1.5 times the amount of the largest tank for a total containment volume of 150,000 barrels. Steps would be installed over the berm to provide access to the tanks and piping. A layer of clay would be constructed to limit any spill seepage. Any other liners would be difficult to keep from puncturing during maintenance within the containment area around the tanks. Any spill would be addressed immediately including a possible shut down of operations during clean up and restoring the berms. The berm would act as a secondary containment to prevent possible spills from reaching the ponds.

Two of the tanks would have a storage capacity of 100,000 barrels (4,200,000 gallons) and two tanks would have a storage capacity of 20,000 barrels (840,000 gallons). The total storage capacity of this system would be approximately 240,000 barrels (10,080,000 gallons). The 100,000 barrel tanks would have a diameter of 146 feet and would be approximately 40 feet in height. The 20,000 barrel tanks would have a diameter of 70 feet and would be approximately 32 feet in height. Each tank would have a sealed, floating roof to prevent the escape of vapors. The tanks would contain coils for heating the oil during storage. Fluid or steam would be heated by engineered electric heating elements and would be pumped through pipes connected to the tank and coils within the tank. The fluid or steam would be cycled and not vented to the atmosphere.

A 5,000 gallon tank containing water with foam injection capabilities would be connected to the crude oil storage tank roof with pipes and pumps to provide fire suppressant. The pipes will have a connecting valve outside of the berm to allow additional suppressant from truck tanks.

Four truck unloading lanes would be located within the site disturbance on existing roadways and on a 0.4 acre area that is currently in the reclamation process. Topsoil from the area of the unloading lanes would be salvaged, stored adjacent to the unloading lanes or with the existing topsoil pile, and seeded with the seed mix listed in Table 2.2.4 or an adjusted seed mix approved by BLM. The unloading lanes would be asphalt leading to and from the truck unloading lanes. The area where the trucks unload would be in a sloped concrete containment area. Drip pans would also be used during unloading for cleanliness. The containment area would prevent any potential spill from leaving the area. All other construction for loading equipment and tanks would be completed on previously disturbed ground. Topsoil would not need to be salvaged as part of the proposed construction activity. Topsoil was salvaged and stockpiled in association with the original construction under the DOGM MRP. Additional growth media was seeded and proved to be a suitable replacement for topsoil. The existing topsoil pile would remain undisturbed until reclamation activities began. An existing road crossing over the rail line would be designated as a topsoil access road to ensure topsoil availability to the eastern coal loading portion of the facility.

Truck unloading racks would be constructed adjacent to the unloading lanes. Four and six inch piping and fixed pumps would be installed to transfer oil from the tanker trucks to the storage tanks through a closed system to prevent vapors from escaping. The fixed pumps would be 50 to 100 horsepower motors that are approximately 20 inches wide and 48 inches tall and would be positioned near the tanks within the natural depression to increase pumping capability.

Up to four additional loading tracks would be constructed on the west side of the main rail line within the Utah Railway ROW and IPA ROW. One additional dual-sided railcar loading rack would be constructed adjacent to the loading tracks and would be connected to the tanks by four and six inch piping to create a closed system. All piping would be of steel construction and would be above ground, where feasible.

A smokeless, natural draft, air assisted, and enclosed vapor combustor would be installed to combust any vapors generated during the loading process as required by the Utah Department of Environmental Quality. Two-inch vapor vent manifold piping would be installed from each railcar station to the combustor where the vapors will be destroyed to a 98 percent destruction efficiency. The combustor would be approximately three feet in diameter and 20 feet tall utilizing propane for the pilot light.

Approximately twelve new light posts would be installed at the truck unloading lanes, tank area, and railcar loading tracks. The lighting fixtures would be a cut-off design to cast light downward and minimize light pollution. All new light structures would be west of the existing rail line and would be pointed downward. On the existing facility east of the railroad tracks, angled or hooded shields would be installed on stacker walkways and all conveyor belt lights to direct the light toward the area requiring light and to minimize light emission in other directions.

Lights that cannot be shielded due to safety reasons, e.g. the truck dump and radial stacker flood lights, would not have additional shields added but could be placed in a downward facing direction. The flood lights are constructed with the bulb surrounded by a metal box so the bulb is not exposed. Currently, light is allowed to be side casted because of the orientation of the light case and has been angled to light the work area. The flood lights on the two radial stackers would be angled down as much as practical, to BLM specifications, to light the required area and reduce side casted light. A manual switch would be installed so the flood lights on the radial stackers and truck dump could be turned off when not needed. Remaining lights that would not be shielded are relatively low and not visible from long distances, e.g. above doorways, on the front of the shop building, on the scale and where the lump coal falls.

A transformer substation would be installed adjacent to the southeast corner of the existing warehouse fence on the west side of the loadout facility. The substation would be located within the existing facility ROW. Two feeds would leave the substation. The first feed would be a pad mount transformer on the west side of the facility near the shop building. The two other buildings would be fed from the transformer by individual feeds. The second feed would be from a pad mount transformer near the tank area and future train loadout area. This transformer would feed to a proposed power controls building.

A 10,000 gallon self-contained diesel fuel tank would be installed adjacent to the truck unloading lanes. The tanks are designed and built with the fuel tank inside of a containment tank. The fuel would be used to fuel tanker trucks as well as coal-hauling trucks.

During construction and operations, the ground would be watered as necessary and vehicle speeds would be restricted to reduce fugitive dust. Marlin and IPA would abide by all applicable requirements for emission standards listed in Utah Administrative Code R307-205.

Phase 2 of the Proposed Action would be the construction of additional tanks to bring the storage volume to 350,000 barrels. Additional tanks would be of the same design and size of the tanks constructed during Phase 1. Timing of Phase 2 is not known at this time and would be determined by the amount of available trucks, railcars, and crude oil product.

Table 2.2.3 summarizes the existing conditions and changes under the Proposed Action. Equipment for oil pumping, electricity, maintenance, fire suppression, loading tracks, etc. would not create any new disturbance areas. The proposed area for the truck unloading lanes has been previously disturbed and is in the process of reclamation but has not been released from bonding, therefore, no additional disturbance on undisturbed ground is proposed.

Table 2.2.3 – Existing Conditions and Proposed Action

Existing Conditions	
Total Facility Surface Disturbance (Acres)	66.9
Traffic on Consumers Road	
Approximate Total Traffic on Consumers Road Daily	485
Approximate Total Traffic from Oil Tanker Trucks on Consumers Road Daily	44
Approximate Total Number of Lights (Not Shielded)	107
Permanent Oil Storage (bbls)	0
Proposed Action	
Surface Disturbance	
Diversion Ditch Proposed Surface Disturbance (Acres)	0.5
Diversion Ditch Proposed Reclamation (Acres)	0.3
New Disturbance Area for Equipment, Tanks, and Tracks (Acres)	0.0
Disturbance associated with Truck unloading lanes	0.4
Total Facility Surface Disturbance After Ditch Reclamation Including Existing Disturbance (Acres)	67.1
Traffic on Consumers Road	
Approximate Total Traffic on Consumers Road Daily	585
Approximate Total Traffic from Oil Tanker Trucks on Consumers Road Daily	144
Lighting	
Approximate Total Number of New Light Posts (Shielded)	12
Approximate Total Number of Shields Installed on Existing Lights	71
Approximate Total Number of Lights	119
Permanent Oil Storage (Thousand bbls)	350

Operations

The waxy and non-waxy crude oil comes from two producing regions in Utah. The first region is within the Uintah Basin near Roosevelt, Duchesne, Altamont, Vernal, etc. The waxy oil from the Uintah Basin would be hauled over a number of county, state, and Federal highways. The oil

would be first picked up at the well head or lease and transported over county roads until reaching Highways 40, 191, and 6. Trucks then travel on Consumers Road until reaching the Wildcat Loadout and turn onto a gravel road.

The second region comprises several fields in Central Utah with the majority of fields being located in Sevier County. This light sweet crude oil contains only a small amount of waxy paraffins and would be first picked up at the well head or lease and transported over county and state roads until reaching I-70 and Highways 10 and 6 until reaching Consumers Road. Trucks would then travel on Consumers road until reaching the loadout facility.

Crude oil trucks would enter the Wildcat Loadout Facility from Consumers Road west of the Utah Railway tracks and along the existing road in a southerly direction to a multiple lane truck unloading rack previously used as the coal truck unloading grizzly. Trucks at the unloading rack would be emptied into the storage tanks through a closed system of steel piping and fixed pumps. The empty trucks would then exit the facility back to Consumers Road. Oil from the storage tanks would be pumped to railcars spotted on tracks dedicated for loading and protected from main line train operations. Utah Railway would provide rail service to the facility.

Initial transloading output would be approximately 6,000 barrels per day and could potentially increase to 20,000 barrels per day after Phase 2 construction is completed. There would be no more than 20,000 barrels loaded per day at this facility without notifying the BLM and additional NEPA analysis may be required if the loading rate were to exceed 20,000 barrels per day. An annual report showing the maximum daily loading rate for this facility would be submitted to the BLM. The number of crude oil trucks travelling along Consumers Road would increase from the current 22 trucks per day (44 passes) to approximately 72 trucks per day (144 passes), which would increase the number of passes by 100. Approximately 12 locally hired workers would be required for operations at the facility and many local truck drivers would be employed for transportation of crude oil to the facility. The facility would be operational at all times (24 hours per day, seven days per week) with workers that have been trained to provide security.

Marlin would be responsible to take all reasonable precautions to avoid spills. The SPCC plan has been amended to incorporate procedures and precautions with additional equipment and tanks to prevent and clean spills. Tanks would be maintained in a manner that would preclude leakage and provide applicable safety measures. Leaks and drips would be caught and spills contained and cleaned promptly. If oil is present in a transfer hose, the oil would be captured in a metal bucket and emptied into the railcar. Drip pans would be used under the trucks and rail cars during unloading and loading operations to catch oil drips. In the event of a breakdown and a spill occurs, the incident would be reported within 24 hours and any necessary repairs would be made as quickly as possible. Emergency spill containment supply kits would be stored on site and on all oil transport trucks. Spill kits would include a containment drum, absorbent pads and booms, and a drip pan. Truckers would be trained on proper loading and unloading safety procedures of crude oil. Railroad tank cars would be inspected before loading operations begin and drip pans would be used during the filling operation to prevent crude oil from reaching the ground. All applicable federal and state regulations regarding oil pollution control would be strictly enforced.

Abandonment and Reclamation

All surface disturbance associated with the coal loading area of the Wildcat Loadout Facility would be reclaimed by the ROW holder according to the DOGM Mining and Reclamation Plan as stated in permit number ACT C/07/0033 once that area of the facility is no longer needed. The surface disturbance associated with the oil loading portion of the ROW would be reclaimed in accordance with the MRP until DOGM no longer retains jurisdiction over the oil loading facility, at which time the site would be reclaimed by the ROW holder according to the Green River District Reclamation Guidelines.

Reclamation of the oil loading portion of the facility would begin immediately after oil loading operations have ceased and the area is no longer needed. All areas except for the sediment ponds and water diversion ditch would be recontoured and revegetated. The sediment ponds and diversion ditch would remain until the reclaimed areas have been revegetated. The sediment ponds would be left in place to capture precipitation runoff from the reclamation area and to prevent runoff from leaving the site. Once the area has been revegetated, the sediment ponds and diversion ditch would be reclaimed using the same methodology.

The loading tracks, tanks, pumps, berms, piping and other oil loading equipment would be removed. The concrete pads that supported the tanks would be removed. The refuse pile would be reclaimed with the east side of the facility according to the MRP. The area would then be contoured to approximate the pre-disturbance topography. The site was generally flat with a shallow slope to the east. The original drainage would not be restored because the railroad tracks would impede the drainage. The last few lifts during the grading and recontouring would not be compacted. This would be completed for the last four feet and would eliminate the need to rip the subsoil before spreading topsoil. The topsoil pile and alternative growth media would be divided between the west and east areas as described in the MRP to provide surface soil for each area. The allotted topsoil or alternative growth media would be spread over the area during the first fall season following the completion of recontouring. The topsoil would then be gouged with rippers or pockmarked as needed. The area would then be seeded with the certified weed-free seed mix shown in Table 2.2.4, or by an adjusted mix approved by the BLM authorized officer by hand-broadcast methods or hydroseeded and hydromulched.

Table 2.2.4 – Final Reclamation Seed Mix

Scientific Name	Common Name	PLS/Acre
<i>Amelanchier utahensis</i>	Utah Serviceberry	2 to 3
<i>Artemisia tridentata</i>	Big Sagebrush	0.06
<i>Krascheninnikovia lanata</i>	Winterfat	2.00
<i>Ericameria nauseosa</i>	Rubber Rabbitbrush	0.30
<i>Purshia tridentata</i>	Bitterbrush	up to 6.00
<i>Achillea millefolium</i>	Yarrow	0.05
<i>Hedysarum boreale</i>	Utah Sweetvetch	1.00
<i>Linum lewisii</i>	Lewis Flax	1.00
<i>Penstemon palmeri</i>	Palmer Penstemon	0.50
<i>Heliomeris multiflora</i>	Showy Goldeneye	0.20
<i>Bouteloua gracilis</i>	Blue Grama	0.60
<i>Pseudoroegneria spicata</i>	Bluebunch Wheatgrass	2.50
<i>Elymus trachycaulus trachycaulus</i>	Slender Wheatgrass	2.50

<i>Pleuraphis jamesii</i>	Galleta	2.50
<i>Hesperostipa comata</i>	Needle and Thread Grass	3.00
<i>Achnatherum hymenoides</i>	Indian Ricegrass	2.00
Total		21.21 to 27.21

Until reclamation bonding is transferred to the BLM ROW, monitoring would be conducted according to the existing MRP. Once the bond is transferred, monitoring would be conducted according to the Green River District Reclamation Guidelines. Monitoring would consist of qualitative methods during the second and fourth growing season following seeding. Qualitative methods would include ocular estimates of vegetation success and slope stability as well as monitoring for noxious weeds. Quantitative methods would be used during the third, fifth, and final year that reclamation is deemed successful. Quantitative methods would include measurement of vegetative cover by line-point intercept method. A reference area has been established near the southeastern corner of the ROW and would be used for comparison of vegetation cover. Recommendations for further seeding or soil supplements can be suggested during any of the monitoring years. If any part of reclamation is detrimental to success, corrective measures would be taken. Once the vegetation has established a desired, self-perpetuating, diverse plant community and reaches 75 percent basal cover compared to the cover on the reference area, reclamation would be deemed successful according to the Green River District Reclamation Guidelines.

In addition to yearly monitoring for vegetation success, periodic inspection for noxious weeds during periods of no snow cover on reclaimed areas would be completed. If noxious weeds are found, a licensed herbicide applicator would use herbicide or mechanical treatments to remove the noxious weeds. Weed control objectives would be to limit the spread of existing weeds and prevent the introduction of invasive species. With the BLM's approval, IPA or EAS would conduct pre-construction weed control by spraying noxious species with BLM approved herbicide. A Pesticide Use Permit including types of chemicals and frequency of use would be submitted and the application would be completed by qualified individuals. Mechanical methods, i.e., hand pulling and cutting plants at ground level may be necessary if the weed population is near desirable plant species or water bodies.

All vehicles and equipment would be power washed before transporting to the project area to prevent the spread of seed. Cleared vegetation and soil from an area known to have weeds would be stock piled in the immediate area and then replaced in the same area where the soils and vegetation were prior to disturbance. IPA or the ROW holder would be responsible for weed control within the ROW throughout the life of the project. Herbicide would be applied during appropriate growth stages of the specific species for better control and prevention of their spread.

Once the area has been successfully revegetated, the sediment pond would be reclaimed and monitored using the same methodology.

2.3 Alternative B – No Action

The No Action Alternative would be for the BLM to deny the modification of the Wildcat ROW. Oil loading operations would continue within the existing Utah Railroad ROW. The number of tanker trucks unloading oil would continue at the rate of approximately 22 truckloads per day.

Marlin would continue to use mobile pumps and loading racks. Tanks would not be installed and the single loading track would remain. Additional oil beyond the facility's capacity to transfer to rail car would need to be stored in portable tanks or hauled to another facility to be loaded on to rail cars. The loadout site would be reclaimed according to the MRP filed with DOGM.

2.4 Alternative Considered but Eliminated from Further Analysis

Alternative sites for the oil storage and loadout were considered but eliminated due to the greater disturbance required for the construction of the tanks and area for the loading equipment. Alternative tank size and configuration were dismissed because they would not meet the storage required for the potential amount of oil received and loaded onto rail cars.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in the ID Team Checklist found in Appendix A and presented in Chapter 1 of this assessment. This chapter provides the baseline for comparison of impact/consequences described in Chapter 4.

3.2 General Setting

Construction of the Wildcat Loadout Facility was completed in 1985 and has been operating ever since. The west side of the facility has been inactive for several years, but still remains and has not been reclaimed. The ROW to use the area for coal preparation and loading is current and will be renewed in 2014. The existing Utah Railway ROW UTSL-015794 was authorized in 1913 and has been used for coal loading since then. Consumers Road is a public road and is maintained by the county and state and has previously been used for mining access and transporting coal to the loadout facility. The annual average daily traffic for Consumers Road in 2010 was 485, was unchanged in 2011, and was as high as 795 in 2004 (UDOT 2011). Traffic volumes for 2012 and 2013 are not known. The facility is located in an area where mining and its related activities have been the main industry and has had no significant environmental impacts, but has had significant positive socioeconomic impacts by means of employment for truck drivers, facility personnel, and local coal mining.

The facility is located on generally flat ground at an elevation of approximately 6,200 feet. The surrounding vegetation is pinyon-juniper woodland and sagebrush grassland. The loadout facility was constructed entirely within sagebrush grassland. The historic land use was wildlife habitat and evidence shows that wildlife migrations have not been negatively affected. Noxious weeds and invasive weeds found in the area are Russian thistle, salt cedar, Russian olive, halogeton, cocklebur, and copperweed. Animal species found in the area are mostly mule deer and cottontail rabbits. Yearly average temperatures taken from 1998 to 2008 at Price, Utah, the nearest weather station to the area, range between 36.5 and 62.5 degrees Fahrenheit and average yearly precipitation 8.17 inches (WRCC 2013).

3.3 Resources/Issues Brought Forward for Analysis

The resources determined to be affected to a degree that require detailed analysis are described in this section. Other resources within the project area listed in the ID Team Checklist were determined not to be affected to a degree requiring detailed analysis.

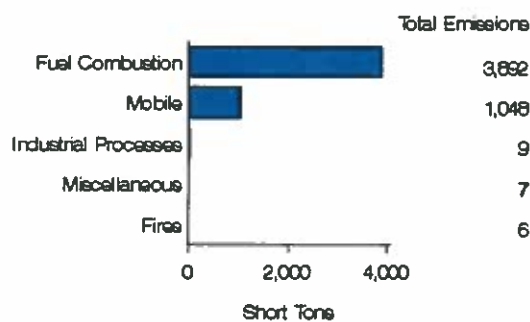
3.3.1 Air Quality

Carbon County, Utah is classified as attainment/unclassifiable for all criteria pollutants under the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) (DAQ 2012). The major sources of particulate matter (PM) air pollution in the area are dust, fuel combustion, and agriculture. Summertime ozone is an issue for the entire west, and winter ozone

formation is an issue in the Uinta Basin to the north of the project area due to emissions from oil and gas development. This regional ozone is from a multitude of sources that range from shipping lanes in the Pacific, natural and man-made volatile organic compound (VOC) emissions, nitrogen oxides (NOx) from electric power generation, and, but not limited to, emissions from major cities in the Western States.

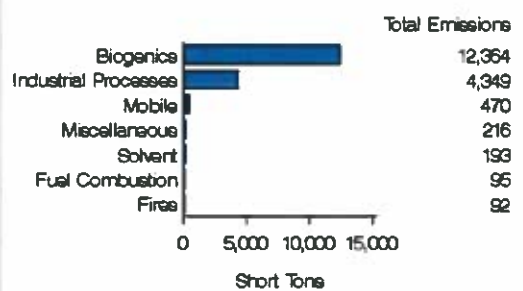
The Tables below are the highest emission sources by county. County inventory data can be found in the Utah Division of Air Quality, 2012 Tri-Annual Report. More data for a specific county can be found here <http://www.epa.gov/air/emissions/index.htm>

Nitrogen Oxides Emissions by Source Sector
in Carbon County, Utah (NEI 2008 v15 GPR)



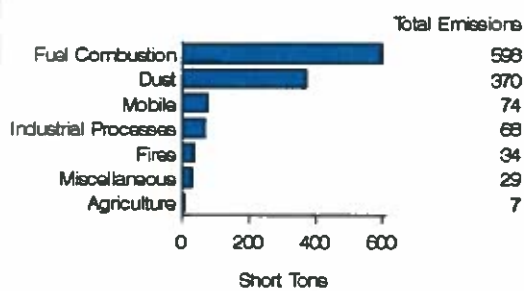
NOx fuel combustion is high in the furthest Southwest corner of county are due to electric energy generation.

Volatile Organic Compounds Emissions by Source Sector
in Carbon County, Utah (NEI 2011 v1 GPR)



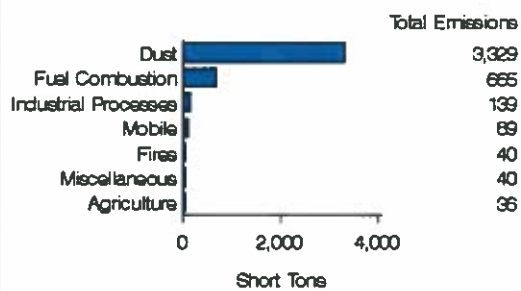
Links: Biogenics, Fuel Combustion, Miscellaneous, Solvent, Fires, Industrial Processes, Mobile

PM2.5 Emissions by Source Sector
in Carbon County, Utah (NEI 2011 v1 GPR)

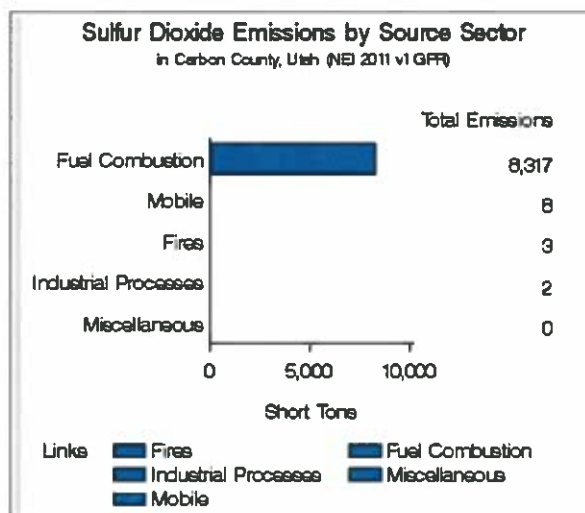


Links: Agriculture, Dust, Fires, Fuel Combustion, Industrial Processes, Miscellaneous, Mobile

PM10 Emissions by Source Sector
in Carbon County, Utah (NEI 2011 v1 GPR)



Links: Agriculture, Dust, Fires, Fuel Combustion, Industrial Processes, Miscellaneous, Mobile



3.3.2 Cultural Resources

The Area of Potential Effect (APE) subject to inventory was defined as 100 meters (approximately 300 feet) from the outside edge of the proposed diversion ditch, loadout development and from the edges of the primary access road to that development.

The BLM is required to initiate consultation with the Utah SHPO and interested Native American tribes regarding the results of the Class III inventory. A Class III Cultural Resource Inventory was conducted in November 2013 pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800) and in coordination with the National Environmental Policy Act and its implementing regulations (40 CFR Part 1500 to 1508), both of which require agencies to gather information on the potential effects of the proposed action on historic properties and to consider alternatives that may avoid or minimize the potential for adverse effects. The inventory addressed 23 acres in the loadout project area, which included an APE defined as 100 meters from the outside edge of the access roads, storage tank localities, and additional rail lines. Of the 23 total acres, 9.2 acres were excluded from the pedestrian survey because the ground surface was covered in asphalt, compacted gravel, or compacted coal detritus, or because the ground surface was obscured by coal waste products and/or fill dirt brought to the site for future reclamation.

An additional Class III Cultural Resource Inventory was completed with the APE defined as 100 meters from the edge of proposed disturbance from the diversion ditch. The area surveyed included 19.05 acres. Five artifacts were found scattered throughout the area and do not constitute a "site" as outlined in BLM Handbook H-8110 and are not eligible for the National Register of Historic Places. Previous archaeological inventories within 1 mile of the loadout have identified 15 archaeological sites, which include lithic scatters associated with hunting activities and stone tool manufacturing and maintenance, camp sites associated with the procurement of plant resources, and historic features, such as railroads, habitations, roads, and trash scatters.

The Utah Railway line (42Cb1258), which is the eastern boundary of the loadout project area, is a working railroad today that retains minimal historic integrity. Class III inventories identified one scatter of historic artifacts (tin cans and bottle glass) west of the main access road and one large lithic scatter with chipped-stone tools was identified on a bench area above and west of the same access road. The scatter of historic artifacts was evaluated by the Utah SHPO as not significant and it would not be adversely affected by the development. The lithic scatter was evaluated as by the Utah SHPO as significant and eligible for the National Register. This site is not located in close proximity to or easily accessed from a road and it would not be significantly affected by the development. Consultation was initiated by the BLM with the Utah SHPO and interested Native American tribes per Section 106 of the National Historic Preservation Act and 36 CFR Part 800.

3.3.3 Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species

The Proposed Action would take place on previously disturbed ground and would utilize the existing roads and railroad lines. The diversion ditch would be in the area adjacent to the west side of the facility. The Wildcat Loadout Facility is partially located within crucial winter habitat for Rocky Mountain elk that covers approximately 241,770 acres (UDWR 2013). The loadout facility is within habitat identified as crucial winter habitat for mule deer. Crucial winter habitat for mule deer covers thousands of acres across the western slopes of the Wasatch Plateau through Central Utah.

The project location is within the Manti subunit of the Central Mountains Management Unit. Monitoring and management of big game by Utah Division of Wildlife Resources (UDWR) are determined by the objectives for each unit within Utah. The 2011 estimate for mule deer within the Manti subunit was 20,900 deer with a population objective of 38,000 and an elk population of 12,500 and objective of 12,000 (UDWR 2011b).

Currently, the oil loading operations involve approximately 22 trucks per day driving on Consumers Road. Consumers Road is maintained year-round and traffic includes recreational travel and coal loading trucks. Impacts to wildlife from current traffic are not known.

3.3.4 Invasive Species/Noxious Weeds

Noxious weeds present within the project area include musk thistle, Russian olive and salt cedar. Invasive species present within the project area include prickly Russian thistle, cocklebur, copperweed and halogeton. Invasive species/noxious weeds are opportunistic and are successful at establishing on disturbed soil. Invasive species/noxious weeds could be introduced or spread by equipment and vehicle traffic along roadways, which is commonly associated with ground disturbing projects. Other vectors of invasion or spread include but are not limited to: wind, water, animal or human. Consumers Road is frequently traveled by coal hauling trucks and recreationalists. This traffic is a factor in the dispersal of invasive species/noxious weeds. IPA has monitored and controlled invasive species within the facility site in accordance with their MRP, state, and county laws. Noxious weeds along Consumers Road are controlled by the Carbon County Weed Department.

3.3.5 Threatened, Endangered, or Candidate Animal Species

The project area is within an area of approximately 45,028 acres of habitat identified as winter and brooding habitat for greater sage-grouse (UDWR 2011a). The proposed storage tanks and equipment would be on an area that has been previously disturbed. Greater sage-grouse depend on various shrub-steppe communities, especially sagebrush and populations are threatened by habitat degradation and fragmentation (UDWR 2011c). A sight specific analysis determined that habitat surrounding the project was heavily degraded and use by sage-grouse would be minimal. The degradation to habitat could be related to the heavy winter use of mule deer and elk within the area. Also, current grazing of sheep within the area could be contributing to a decline in the overall health of the habitat. Currently there is no documentation of sage-grouse occurring within or around the project area.

3.3.6 Wastes (hazardous or solid)

The Proposed Action would involve the transfer of waxy liquid crude oil at temperatures below 160 degrees and non-waxy crude below 130 degrees Fahrenheit and could contain small amounts of volatile hydrocarbons. Diesel fuel, cleaners, and other chemicals that are potentially hazardous to the environment may also be used within the facility. The Wildcat Loadout Facility has been designed to capture all precipitation from within the site into sediment ponds and prevent it from flowing off the site. Spills or leaks have the potential to flow into these sediment ponds. Precipitation runoff from the higher elevations to the west of the facility are diverted around the southern area of the facility or captured in the upper permanent impoundment on the western edge of the facility.

3.3.7 Water Resources/Quality (drinking/surface/ground)

The proposed project would be within a disturbed area with protections for surface and groundwater quality that includes sediment ponds. Precipitation runoff from the existing wash is captured in permanent impoundments. The project area has been designed to capture all precipitation runoff from within the facility in sediment ponds. The facility has been granted Utah Pollutant Discharge Elimination System (UPDES) Discharge Permits (see Appendix C) in accordance with the Clean Water Act to allow discharging from the sediment ponds if the water meets the standards in the permits. The site has been designed to use berms, culverts, and diversions to protect runoff from contaminating the surrounding area and water resources. The facility was constructed on an ephemeral drainage. The drainage at the site is a tributary to Garley Canyon, which feeds into the Price River. The existing diversion ditch has failed and allows precipitation runoff to flow toward the facility. Precipitation from the undisturbed ground on the north side and further up the drainage flows into two impoundment ponds within the west side of the facility.

Prior to constructing the coal loadout facilities, a geotechnical study was conducted. Eight drill holes were drilled to a depth of 45 feet and no ground water was located. Two additional holes were drilled to a depth of 60 feet to set piling below the loadout and no ground water was observed. The two hole were left open for two months and checked on a weekly basis. Ground water was not present and it was concluded that ground water did not exist at the drilling

location. A more recent geotechnical investigation for the proposed tanks was conducted. Five holes were drilled to maximum depth of 34.5 feet. Ground water was not found at four of the five holes. One bore intercepted water at approximately 30 feet below the ground surface and bedrock at approximately 34 feet. The bore location was in a sediment pond where precipitation likely flowed to, percolated down, and was stopped by the bedrock beneath. The general area is not known to contain any significant aquifers.

3.3.8 Vegetation Excluding USFW Designated Species and BLM Sensitive Species

Since the construction of the Wildcat Loadout Facility, all unused portions of the facility disturbance area including topsoil and refuse stockpiles have been seeded for revegetation. The proposed truck unloading lanes would be in a 1.2 acre area that has been unused and revegetated and is not located on the topsoil or refuse stockpiles. The proposed diversion ditch would be within shrubland and pinyon-juniper woodland. The shrubland within the draw covers approximately 6.7 acres and is mostly winterfat and blue grama. Other species include Indian ricegrass, prickly pear, and crested wheatgrass. The woodland covers over 100 acres and is dominated by pinyon pine and Utah juniper. Other species include buckwheat species, bluebunch wheatgrass, prickly pear, and penstemon species. The diversion ditch would include approximately 0.35 acres of shrubland and approximately 0.15 acres of woodland, totaling approximately 0.5 acres.

The Wildcat Loadout Facility is currently bonded with DOGM for reclamation. Reclamation procedures are outlined in the MRP. IPA has rented the west area of the facility to Marlin, who operates the oil loading. The reclamation bond would be under the jurisdiction of DOGM until the bond could be transferred to the BLM ROW. The reclamation would then follow the reclamation procedures described in Chapter 2, the Proposed Action, and the Green River District Reclamation Guidelines would apply.

3.3.9 Visual Resources

The project area would be within a VRM Class III area. Class III areas are managed to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate (BLM 2008).

The existing facility covers approximately 66.9 acres at the project area. The larger equipment at the facility includes a loadout tower, a crusher building, magnesium chloride and water storage tanks, and several conveyor belts. The coal storage area is large enough to stack coal into a pile up to 85 feet high. The facility has approximately 107 lights for 24 hour operations and safety precautions.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

This section analyzes the potential impacts of the Proposed Action to the resources described in Chapter 3.

4.2 General Analysis Assumptions and Guidelines

For the purpose of analysis, several assumptions have been adopted. All relating provisions of the Price Field Office stipulations for the ROW would be followed, as well as all agreements in place between IPA, EAS, and the Price Field Office for oil loading operations.

The impacts discussed are based on the foreseen impacts created as a result of the installation of new equipment and facilities within an area that has been previously disturbed for coal loading operations and the estimated size of the diversion ditch on previously undisturbed ground.

4.3 Direct and Indirect Impacts

Direct impacts associated with the Proposed Action stem from disturbance from the diversion ditch, disturbance over previously revegetated areas, the anticipated increase in traffic volume along Consumers Road, and the increased volume of oil product handled and stored at the facility. Impacts could come from increased emissions, possible oil spills, damage to revegetated areas, and the presence of equipment. Indirect impacts could come from increased truck traffic.

4.3.1 Alternative A – Proposed Action

4.3.1.1 Air Quality

The annual average daily traffic for all vehicles combined on Consumers Road has been as high as 795 in 2004 and was 485 in 2011 (UDOT 2011). The Proposed Action would increase the daily traffic by approximately 50 vehicles making round trips on Consumers Road. Traffic would increase to approximately 585 vehicles passing per day. Given the relatively minor levels and sporadic nature of the mobile emissions associated with this increase in daily traffic it is highly unlikely to cause or contribute significantly to any violations or exceedences of the NAAQS. Since the transfer of oil product from truck to storage tank and storage tank to rail car would be sealed, there are no gas emissions expected from transferring oil product. Any VOCs would be contained within the storage tanks and emitted through a combustor that would destroy approximately 98 percent of the VOC compounds. The amount of VOCs released from construction equipment would be short term and would last for the duration of construction. Fugitive dust may be created during the construction of the storage tanks, truck unloading lanes, and loading tracks, but would also be highly unlikely to cause or contribute significantly to any violations or exceedences of the NAAQS due to the relatively minor level and sporadic nature of the emissions. Fugitive dust would be reduced by applying water as necessary during construction and operations. Vehicle speed would be reduced within the ROW to decrease fugitive dust.

Emissions for this project will predominately be VOCs from crude-oil storage and railcar loading. Minor amounts of PM10, PM2.5, CO, NOX, and SO2 will also be emitted. Emissions calculations for this project were made with the use of AP-42 Emission Factors for loading petroleum products and with the use of AP-42 emission factors for combustors (flares). The following table summarizes criteria pollutant emissions from each source, assuming proposed Best Available Control Technology (BACT) control measures are accepted.

Annual Emissions, tons/year								
Source	VOC	PM-10	PM-2.5	CO	NOx	SO2	CO2*	CH4
Rail Car Loading	8.82							
Tanks	5.33							
Vapor Combustor	0.77	0.01	0.01	2.07	0.48	0.11	904	0.002
Fugitive	2.65							
Roads		9.29	0.93					
Totals	17.57	9.29	0.93	2.07	0.48	0.11	904	0.002

* Metric
Tons

Annual Emissions, tons/year						
Source	Benzene	Ethyl benzene	Toluene	Xylenes	Hexane	
Rail Car Loading	0.009	0.009	0.044	0.044	0.039	
Tanks	0.005	0.005	0.027	0.027	0.023	
Vapor Combustor	0.000	0.000	0.000	0.000	0.000	
Fugitive	0.003	0.003	0.013	0.013	0.012	
Roads	0.000	0.000	0.000	0.000	0.000	
Totals	0.017	0.017	0.084	0.084	0.074	

BACT Considerations will be as follows for actions that may be unspecified in the document already:

- Submerged Fill-Tube Rail Car Loading and use of a vapor combustion unit
- Use of cone-roof tanks with internal-floating roofs
- Wetted roads for controlling PM emissions from haul roads

Specific uses and equipment used along with their single emissions can be found in the original NOI.

4.3.1.2 Cultural Resources

The two sites identified during the course of the Class III Cultural Resource Inventories are located about 100 meters (approximately 300 feet) to the west of the primary access road and would not be directly affected by the development under the Proposed Action. The sites are rather obscure and would not be recognized as historic properties by most individuals. Site location information remains confidential and there would be minimal risk of theft of artifacts, vandalism to subsurface deposits, or inadvertent disturbance.

4.3.1.3 Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species

The Proposed Action would utilize approximately 20 acres of previously disturbed ground, (10 acres during Phase 1 construction and 10 acres in Phase 2) and approximately 0.5 acres of undisturbed ground adjacent to the facility. The project area is less than one percent of the surrounding crucial winter habitat for mule deer and elk. Less than 1.2 acres of revegetated area would be disturbed during the life of the Proposed Action. There would be sufficient forage for both mule deer and elk within the crucial winter habitat. Traffic along Consumers Road would increase from 485 to approximately 585 passing vehicles per day. Occasional impacts with vehicles and mule deer and elk are not expected to be persistent or detrimental to the mule deer or elk herds.

4.3.1.4 Invasive Species/Noxious Weeds

The Proposed Action has the potential to introduce or spread noxious weeds or invasive species, especially in the area of new disturbance for the diversion ditch. The general operations and construction of the facility carry a potential risk of spreading noxious weeds and invasive species from one location to another with the transfer of equipment and truck traffic. The ROW holder would be responsible for noxious weed control within the project area for the life of the ROW. Invasive species and noxious weeds would be controlled by spot treatments with BLM approved herbicides by a licensed applicator or by mechanical treatment in areas near water or desirable plant species. In order to reduce potential impacts to wildlife, grazing, and adjacent plant resources, all herbicide application would be conducted in accordance with State and Federal law. With BMPs described in the Proposed Action, the spread of invasive species and noxious weeds would be reduced within the project area and surrounding area.

4.3.1.5 Threatened, Endangered, or Candidate Animal Species

The project area is within an area identified as greater sage-grouse winter and brooding habitat. The Proposed Project would cover less than one percent of the area identified as habitat. There would be sufficient habitat remaining for sage-grouse wintering and brooding. The storage tanks and equipment would not result in any disturbance to habitat. The proposed diversion ditch would impact approximately 0.5 acres of winterfat shrubland and and pinyon-juniper woodland, which is not ideal habitat for sage-grouse wintering and brooding activity. Impacts to greater sage-grouse would be negligible. Consultation with Utah Division of Wildlife Resources (UDWR) in accordance with BLM IM-2012-043, did not result in a need for any mitigation.

4.3.1.6 Wastes (hazardous or solid)

The facility could potentially store up to 350,000 barrels of crude oil. The storage tanks would be surrounded by berms, liner, and fill to prevent spills from leaving the tank area. The berms would be able to hold 1.5 times the volume of the largest tank. Leak detection structures would be installed at the tank location as a measure to identify and repair leaks. Proper transfer methods would be used to prevent spills while loading the storage tanks and rail cars. A drip pan would be used under the rail cars and trucks to prevent drips from reaching the ground. The waxy crude oil product is waxy at ambient air temperatures and does not flow. If a spill were to occur, the extent

of the contamination would be small and localized to the spill location. The non-waxy crude oil will flow at ambient temperatures and if a spill were to occur, all procedures would be followed according to written SPCC policy.

The Wildcat Loadout Facility has been designed to capture all runoff from within the site to sediment ponds. The two proposed ponds would be lined with clay or a polyethylene membrane and would also capture runoff from within the facility. If oil product is caught in precipitation runoff, it would be captured in the ponds and would not flow off the site. Due to the remote area of the site, it is unlikely that any spill would reach the Price River.

An SPCC plan has been incorporated into the current MRP according to CFR Part 112 for the current oil loading operations. The plan has been amended to include the storage tanks and increased transfer of oil product. The NPDES Discharge Permits require monitoring and tolerances for any water discharged from the site.

It is possible for spills to occur even when using safe and precautionary methods. There would be containment and clean up procedures to prevent contamination. There would be only temporary, small scale impacts resulting from a spill.

4.3.1.7 Water Resources/Quality (drinking/surface/ground)

The Proposed Project would include spill prevention structures and measures to prevent any spill from exiting the facility. Berms and liners around the tanks would prevent spills from leaving the tank area. Leak detection features would allow the discovery of tank leaks and the tanks would be repaired and the spilled oil would be cleaned up. Oil loading procedures would be followed to prevent spills while transferring oil.

Because of the viscous nature of the crude oil product, it is not likely that the oil would reach the ephemeral drainage near the site and is highly unlikely that it would reach the Price River due to its distance from the river. The nearest drainages are ephemeral and flow only after snowmelt and during intense rainfall. The 100-year-24-hour precipitation event would result in 0.773 acre-feet in the southern area and 0.13 acre-feet in the northern area of the facility. The facility area has been designed so precipitation runoff on the facility flows into the two proposed ponds and there is no outlet from the ponds. The ponds have been designed with a capacity to contain a greater volume than the 100-year-24-hour event. If a spill occurred and precipitation runoff carried oil, the water would be captured in the lined ponds and would not likely leave the facility site. The lining in the ponds would prevent oil from soaking into the ground. The oil from the ponds would be collected for off-site treatment and disposal. NPDES Discharge Permits further restrict the standards for any discharge from the facility.

Spill prevention and clean-up procedures are listed in the SPCC plan (Appendix B) stored on site. Table 2.2 of the SPCC plan lists the areas where spill potential is likely and the potential worst case situation spill rates. Runoff from the undisturbed ground to the west of the facility would be diverted around the site to the tributary of Garley Wash to avoid contamination. Inspections of the equipment, ponds, dam, and diversion ditch would be conducted daily and a formal inspection would be conducted monthly to ensure proper function according to DOGM

standards. There would be no impacts to groundwater because spills would be promptly cleaned before the viscous oil would be able to seep deep enough to reach the water table. Impacts from spills would be temporary and would be limited to surface water captured at the site.

The Price River would receive runoff from the undisturbed area around the facility through Garley Wash during precipitation events. The Price River is not supporting the designated beneficial uses identified by the Environmental Protection Agency and Utah Division of Water Quality. The causes of impairment and probable sources of increased total dissolved solids are unknown. The amounts of total dissolved solids in the Price River would not likely increase from the Proposed Action or increased oil truck traffic from gravel and dust. Any potential oil spills would not come into contact with water in Garley Wash or the Price River.

4.3.1.8 Vegetation Excluding USFW Designated Species and BLM Sensitive Species

The Proposed Action would result in approximately 0.5 acres of surface disturbance in the project area resulting in the direct loss of approximately 0.35 acres of winterfat shrubland and approximately 0.15 acres of pinyon-juniper woodland. Disturbance would last for the life of the Proposed Action. Approximately 0.3 acres of previously disturbed ground from the existing diversion ditch would be reclaimed. Reclamation activities at the existing ditch would begin at the time of construction for the proposed ditch and successful reclamation is estimated to be within three to five years.

The Proposed Action would also result in the clearing of approximately 0.4 acres of the 1.2 acres of revegetated area for the construction and maintenance of the truck unloading lanes. The area was previously disturbed and has since been seeded and vegetation has established. The area has not been released from reclamation bonding and still requires final reclamation once the Proposed Action has expired.

The Wildcat Loadout Facility is bonded through the DOGM approved MRP. Reclamation activities would be in accordance with that plan until the MRP is amended. Reclamation bonding would be transferred to the ROW agreement. Once the bond is transferred, reclamation would be in accordance with the BLM Green River District Reclamation Guidelines and the procedures in the Proposed Action would be completed.

4.3.1.9 Visual Resources

The Wildcat Loadout Facility already has large equipment for preparing and loading coal. The additional equipment from the Proposed Action would not alter the existing character of the landscape. The tanks would be in an area that is smaller than the area of the existing coal stockpile and would not reach the height of the existing loadout tower. The tanks would be painted with a BLM approved color to reduce contrast with the surrounding area. Additional lighting and existing conveyor lighting would be shielded to aim downward or angled to reduce the visual impact to the view at night and would not likely result in measurable lighting effects. Downward facing stacker flood lights will help eliminate the visual impacts and light flooding. Downward facing lights will also meet safety precaution requirements and focus the light to the areas where work is being performed.

4.3.2 Alternative B – No Action

The No Action Alternative would be the denial of the modification to the ROW of the Wildcat Loadout Facility. There would be no direct, indirect, or cumulative impacts from the Proposed Action. The No Action Alternative would result in the continued use of the Wildcat Loadout Facility for coal preparation and loading. The area within the Utah Railway ROW would continue to be used for transloading oil. Mobile pumps and mobile storage tanks would still be used for the oil loading operations.

4.3.2.1 Air Quality

The air quality for the area would still be an attainment/unclassifiable area for the NAAQS. Pollution emissions would continue from the existing sources. The emissions from the current oil loading would continue and would not increase the levels of pollutants above state and federal standards.

4.3.2.2 Cultural Resources

Cultural resources discovered during the Class III Cultural Resources Inventories would not be impacted under the No Action Alternative. Neither the Proposed Action nor the No Action Alternative propose development over the cultural sites found during the completed cultural surveys.

4.3.2.3 Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species

There would be no impacts to wildlife associated with the Proposed Action under the No Action Alternative. No additional habitat would be disturbed. Traffic along Consumers Road would continue. Impacts to mule deer and elk would remain at current levels.

4.3.2.4 Invasive Species/Noxious Weeds

There would be no impacts from the Proposed Action under the No Action Alternative. The invasive species and noxious weeds would continue to be monitored and controlled on site by IPA and EAS. The spread of noxious weeds would remain relatively constant as the loadout facility continues oil and coal loading operations. There would be no new disturbance to provide opportunity for invasive species/noxious weeds to establish.

4.3.2.5 Threatened, Endangered, or Candidate Animal Species

There would be no additional impacts to greater sage-grouse under the No Action Alternative. The loadout facility would allow continuing operations of coal loading and oil loading within the railway ROW. There would be no additional disturbance to vegetation or habitat.

4.3.2.6 Wastes (hazardous or solid)

There would be no additional impacts from waste under the No Action Alternative. Crude oil loading would continue within the Utah Railway ROW using mobile pumps. The likelihood of spills would remain unchanged from current use. The approved SPCC plan would continue to be followed under the MRP. Spill prevention measures such as drip pans and wash stations would continue to be used at the facility. The drainage and sediment ponds would remain functional to prevent precipitation run off from leaving the site.

4.3.2.7 Water Resources/Quality (drinking/surface/ground)

There would be no additional impacts to water resources under the No Action Alternative. The protections for surface and ground water would continue to be employed at the loadout facility. Spills would still be possible, however the site has been designed with berms, culverts, and diversions to protect water quality.

4.3.2.8 Vegetation Excluding USFW Designated Species and BLM Sensitive Species

There would be no additional impacts to vegetation under the No Action Alternative. The revegetated areas of the facility would not be disturbed. The final reclamation of the site would follow the plan in the approved MRP. The reclamation bond associated with the Wildcat Loadout Facility would remain filed with DOGM.

4.3.2.9 Visual Resources

There would be no additional impacts to visual resources under the No Action Alternative. The facility equipment would remain unchanged and there would be no permanent storage tanks installed at the facility. The existing character of the landscape would not be altered beyond current conditions. The impacts to visual resources could be greater under the No Action Alternative than under the Proposed Action because the existing lighting would not be shielded.

4.4 Cumulative Impacts

“Cumulative impacts” are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

4.4.1 Air Quality

4.4.1.1 Cumulative Impact Area

Most of Utah is within NAAQS attainment or unclassified except for the densely populated urban areas along the Wasatch Front (DAQ 2012). Carbon County as a whole is in attainment/unclassifiable and is considered the Cumulative Impact Area (CIA) for analysis.

4.4.1.2 Past and Present Action

The project's location is in an area that has been developed for natural gas production. Over 50 natural gas well pads are within two miles of the facility area and approximately 1,900 wells are in Carbon County. Emissions are produced during oil and gas production that include dust from traffic over dirt roads and emissions from vehicles and equipment. Trucks and heavy equipment cause fugitive dust when travelling on dirt roads or during agricultural plowing. Wildland fires emit PM over much of Carbon County. Recreation in the area, mostly off-highway vehicles, cause fugitive dust emissions. There are two other oil loadouts in Carbon County. Each loadout has the capacity to transfer up to 100 truckloads per day and are subject to Division of Air Quality standards. Carbon County has been an area of coal mining and associated coal-hauling truck traffic.

4.4.1.3 Reasonably Foreseeable Action Scenario

Oil and gas production continues in Carbon County, and multiple wells are proposed. Unpaved roads in association with the new wells would be constructed and would lead to vehicle emissions and fugitive dust during construction and travel. Agricultural practices would continue resulting in fugitive dust from plowing and harvesting crops as well as heavy equipment emissions. The coal loading at the facility would continue. The facility was designed to store and transport approximately five million tons of coal per year, which is greater than the current approximate half-million tons per year. The future amount of coal prepared and loaded at the facility is not known at this time, but the traffic on Consumers Road from coal-hauling trucks is not likely to exceed the traffic levels that occurred when the loading at the facility was near full capacity. Trucks travelling on Utah highways from oil producing areas to the existing oil loadouts would also continue as well as the loadout operations that produce VOCs.

4.4.1.4 Cumulative Impact Analysis

The impacts to air quality from the Proposed Action would be additive and would represent a small percentage of air pollutants in Carbon County. The impacts to air quality resulting from increased truck traffic, operational equipment, and fugitive dust created during construction would be negligible compared to the past, present, and future emissions within the county. The minor emissions increases associated with this project would not be sufficient to cause or significantly contribute to any county level or regional air quality concerns.

The No Action Alternative would not have any cumulative impacts beyond the impacts from current activities because the No Action Alternative is to maintain the current activities within the ROW.

4.4.2 Cultural Resources

4.4.2.1 Cumulative Impact Area

The CIA for cultural resources would be the area within one mile of the project area.

4.4.2.2 Past and Present Actions

Prior to ground disturbing activities, cultural resource inventories have been conducted. Historic artifacts, when found, have been collected by more modern residents prior to laws protecting cultural resources. Since protective laws have been established, multiple sites have been discovered and researched. Previous archaeological inventories within 1 mile of the loadout have identified 15 archaeological sites, which include lithic scatters associated with hunting activities and stone tool manufacturing and maintenance, camp sites associated with the procurement of plant resources, and historic features, such as railroads, habitations, roads, and trash scatters.

4.4.2.3 Reasonably Foreseeable Action Scenario

Future activities will require surveys to locate cultural sites for the protection of cultural resources.

4.4.2.4 Cumulative Impact Analysis

The project area would avoid all cultural sites. There would be no expected impacts to cultural resources from the Proposed Action. The No Action Alternative would not impact cultural resources beyond impacts from current activities.

4.4.3 Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species

4.4.3.1 Cumulative Impact Area

The CIA is the crucial winter habitat for deer and elk within the UDWR's Central Mountains Management Unit, which covers the Wasatch Plateau from near Scofield Reservoir south to Salina, Utah. Crucial winter habitat for mule deer extends beyond CIA, however the management unit is the basis for UDWR's recommendations for management of big game.

4.4.3.2 Past and Present Actions

The CIA serves multiple uses including oil and gas development, mining, and recreation. In 2011 approximately 1,570 mule deer and 1,325 elk were harvested from the management unit (UDWR 2011b). There are multiple roads and highways through the unit, which have led to vehicle-wildlife collisions. The two oil loadouts in Carbon County also are increasing truck traffic throughout the Uintah Basin and Southern Utah, which could lead to increased collisions. Coal production has decreased since 2000 (Boden et al. 2013) and associated coal-hauling trucks has also decreased. Oil and gas development has led to the temporary disturbance of winter habitat. Several mitigation and reclamation projects have been funded or completed by oil, gas, and coal producers and overall vegetation productivity has most likely increased.

4.4.3.3 Reasonably Foreseeable Action Scenario

Although it is unlikely that additional well sites would be constructed near the loadout, additional wells and mines would be constructed elsewhere within the management unit.

Additional habitat would be disturbed until reclaimed. Traffic along roads and highways would continue as well as collisions.

4.4.3.4 Cumulative Impact Analysis

The Proposed Action would have little additional impact to mule deer and elk because traffic along Consumers Road would have little increase to existing traffic and only a small portion of the habitat would be disturbed.

The No Action Alternative would have no additional cumulative impacts beyond the current activities because there would be no additional disturbance or traffic.

4.4.4 Invasive Species/Noxious Weeds

4.4.4.1 Cumulative Impact Area

The CIA would be the area of Consumers Wash. The area is approximately four square miles and would be the area most impacted by the Proposed Action. Noxious weeds are found throughout Utah and any vehicles, whether associated with the Proposed Action or not, could spread seed. Extending the CIA beyond the area of the loadout facility and immediate surrounding area to every connecting road between the loadout and producing wells is beyond the scope of this EA.

4.4.4.2 Past and Present Actions

Travel along Consumers road has been mainly associated with oil and gas production, mining, and recreation. Livestock grazing, recreation, oil and gas production and wildlife in the area has contributed the spread of noxious weeds and invasive species. A power line has been constructed from Helper to the southwest across the area and another line along Consumers Road westward. A telephone line has been buried adjacent to Consumers Road from Highway 6 to the loadout site. The area within the Consumer Road ROW has various disturbances adjacent to the road. Noxious weeds and invasive species have the potential to spread within these disturbances. IPA continues to monitor and control noxious weeds within the facility and loadout ROW and the BLM and county monitors and controls noxious weeds along Consumers Road and the county roads within the area.

4.4.4.3 Reasonably Foreseeable Action Scenario

Consumers Road will continue to be used for oil and gas production, mining, and recreation. Noxious weeds will continue to be monitored and controlled by IPA, BLM, and Carbon County.

4.4.4.4 Cumulative Impact Analysis

It is possible that after implementation of the Proposed Action, vehicles, humans, and animals could spread the invasive species/noxious weeds throughout the project area. Since invasive species/noxious weeds are in the project area, it is also possible vehicles could spread the seed to

any road or area in the CIA. ATVs, livestock, and wildlife could spread invasive species along any of the roads within the CIA as well.

Disturbance to the soil surface caused by project-related construction activities could potentially increase the invasion and establishment of invasive species or noxious weeds. The negative environmental aspects of invasive species/noxious weeds establishment on the project area could include:

- degradation of wildlife and livestock habitat,
- increased soil erosion,
- reduced land values,
- reduction of aesthetic values, and
- reduction of native plant diversity.

Because of the noxious weed and invasive species controls within the Proposed Action, weeds would be controlled within the facility area.

Under the No Action Alternative potential for the spread of invasive species/noxious weeds would continue due to the invasive species/noxious weeds that are currently within the area, however the potential would be lower than under the Proposed Action since no surface disturbance would occur. Control of noxious weeds would continue on an annual basis.

4.4.5 Threatened, Endangered, or Candidate Animal Species

4.4.5.1 Cumulative Impact Area

The CIA is the area of greater sage-grouse winter and brooding habitat, which covers approximately 45,028 acres of Carbon County.

4.4.5.2 Past and Present Actions

The CIA has been developed for oil and gas production and numerous well pads are within the area. The pads are connected by a system of dirt roads and traffic along the roads include recreational and gas production travel. The North Springs Shooting Range is also within the delineated habitat area. If possible, greater sage-grouse would likely avoid areas of human activity, which would reduce the area suitable for wintering and brooding. High tension power lines and pipelines cross through the habitat and have disturbed native vegetation and habitat.

4.4.5.3 Reasonably Foreseeable Action Scenario

The area will continue to be used for gas production, and new wells could be drilled. Traffic associated with gas production will continue for the life of the gas field. Recreational traffic will continue.

4.4.5.4 Cumulative Impact Analysis

The Proposed Action would have little additional effect on greater sage-grouse when combined with the past, present, and foreseeable activities within the CIA. The proposed oil loading equipment would be on previously disturbed ground and the proposed diversion ditch would be adjacent to the facility, an area likely avoided by sage-grouse.

The No Action Alternative would have no cumulative impacts beyond the impacts from current activities because no additional area would be disturbed and current activities would continue.

4.4.6 Wastes (hazardous or solid)

4.4.6.1 Cumulative Impact Area

The CIA is the Garley Canyon tributary where the site is located. All oil transfers from truck tanker to rail car would be conducted within the facility and any spills occurring would be confined to the site by spill prevention measures.

4.4.6.2 Past and Present Actions

The oil transloading operations have been active and approximately 6,000 barrels of oil are transferred to rail cars per day. The facility has a current SPCC plan and spill prevention and clean-up measures to avoid impacting the surrounding environment. Trucks are also equipped with spill clean-up kits. The loadout facility has been designed to prevent coal and coal fines from leaving the site. The facility has been used to prepare and load coal onto rail cars since 1985.

4.4.6.3 Reasonably Foreseeable Action Scenario

Marlin anticipates loading approximately 6,000 to 20,000 barrels of oil per day from the facility. There are no additional plans for oil loading at the facility except for the Proposed Action. The facility will continue to prepare and load coal onto rail cars.

4.4.6.4 Cumulative Impact Analysis

The impacts from the Proposed Action would have little additional impacts because of the spill prevention and leak detection measures. The volume of oil transferred and stored at the site would increase, however the Proposed Action design includes methods to handle the increased volume while avoiding spills.

The No Action Alternative would have no cumulative impacts beyond the current activities because no additional equipment or storage tanks would be constructed.

4.4.7 Water Resources/Quality (drinking/surface/ground)

4.4.7.1 Cumulative Impact Area

The CIA is the Garley Canyon tributary where the site is located. All oil transfers from truck tanker to rail car would be conducted within the facility and any spills occurring would be confined to the site by spill prevention measures. The ephemeral drainage eventually feeds into the Price River, however, due to the distance from the river, any contaminants are not likely to reach the river.

4.4.7.2 Past and Present Actions

Approximately 6,000 barrels of oil are loaded onto rail cars per day at the facility. Coal preparation and loading have been conducted at the site since 1985. The loadout facility is designed to prevent any runoff from leaving the site. After snowmelt and precipitation events, the ephemeral drainage near the site flows into Garley Wash and eventually into the Price River bringing sediments with it and increases total dissolved solids in the river.

4.4.7.3 Reasonably Foreseeable Action Scenario

Coal loading operations will continue at the site as long as coal is available. Oil loading operations would continue as long as transporting oil by train car is economically feasible. There are no plans for expansion of the site or additional sites within the area for oil loading.

4.4.7.4 Cumulative Impact Analysis

The loadout facility and Proposed Action have been designed to prevent spills and runoff from leaving the facility site. The Proposed Action includes the use of berms, leak detection and clean-up procedures. The Proposed Action would have little additional impacts to water quality when combined with past, present, and foreseeable activities. Additional oil truck traffic on Consumer's Road would have a negligible effect on the amount of total dissolved solids deposited in the Price River. Runoff from undisturbed areas above the site would be diverted around the site and into the tributary of Garley Wash. The water would not come in contact with oil. If an oil spill occurred onsite and was carried by precipitation, the water would flow into the proposed ponds and any oil would be caught in the ponds. The ponds would be lined so no oil could seep into the ground and contaminate any ground water. Any potential oil spill would be contained and cleaned using procedures listed in the SPCC plan. Clean-up would occur immediately after the spill, which would prevent oil from seeping far enough through the ground to reach any ground water.

The No Action Alternative would not have cumulative impacts beyond the current activities because oil would not be permanently stored on site and additional equipment would not be constructed.

4.4.8 Vegetation Excluding USFW Designated Species and BLM Sensitive Species.

4.4.8.1 Cumulative Impact Area

The CIA is the Consumers Wash and Garley Canyon area because of the similar vegetation and soil types of the facility area. Impacts to areas beyond the CIA are not expected.

4.4.8.2 Past and Present Actions

Consumers Road has provided access to the loadout facility and mining activity for years. Several areas adjacent to Consumers road have been disturbed by ditches, pull outs, road intersections, and utility corridors. Other vegetation disturbance in the area include multiple gas well pads and access roads, power and utility lines, and the Wildcat Loadout Facility. Disturbance from utilities has been reclaimed or seeded with desirable species to allow use of the utility lines.

4.4.8.3 Reasonably Foreseeable Action Scenario

The well pads and access roads will continue to provide access into the area. The well pads and the loadout facility will be reclaimed once they are no longer operational. Additional gas wells may be drilled and could disturb additional areas of vegetation. The existing power and utility lines will remain until they are no longer needed. There are no other plans for ground disturbing activities proposed at this time.

4.4.8.4 Cumulative Impact Analysis

Cumulative impacts resulting from the Proposed Action would be additive to the existing disturbances from well pads, access roads, and utility lines. The disturbance of approximately 0.5 acres of vegetation for the diversion ditch would last for the duration of the facility and would be reclaimed with the facility. Reclamation of the loadout facility would begin once the facility is no longer needed. Cumulative impacts to vegetation would be minimal compared to the large area of the CIA.

The No Action Alternative would not have cumulative impacts beyond the impacts from the current activities because no additional vegetation would be disturbed from the Proposed Action and the reclamation would be completed as described in the facility MRP.

4.4.9 Visual Resources

4.4.9.1 Cumulative Impact Area

The CIA is the area around the loadout facility designated as VRM Class III because it is the area most likely impacted by the Proposed Action and additional impacts to the area must be considered for management as a Class III area.

4.4.9.2 Past and Present Actions

The loadout facility was first constructed in 1985 and has since been expanded to a site covering approximately 66.9 acres. The large equipment and loadout tower can be seen from the surrounding area and the night time lights can be seen from a greater distance. The view shed has been altered by power lines, rail lines, well pads, and access roads. The current management for visual resources allows for a moderate change to the landscape.

4.4.9.3 Reasonably Foreseeable Action Scenario

Consumers Road and the Utah Railway will exist for the foreseeable future. The existing well pads will be reclaimed once they are no longer producing and there is a potential for additional wells within the area. The power line crossing the area from Helper to southwest of the area will remain for the foreseeable future. The Wildcat Loadout Facility will remain until coal is no longer available and the oil loading operations will continue until transporting oil by rail car is no longer economically practical. There are no other proposed plans for expanding the existing facility or additional sites. Any future disturbances that could cause impacts to visual resources would require additional analysis.

4.4.9.4 Cumulative Impact Analysis

The Proposed Action would result in the addition of large oil storage tanks and loading equipment as well as additional lighting. The lighting would be shielded downward and would add a negligible amount of light to the existing facility lights. Existing lights that are not critical for the safety of the facility workers would be shielded to reduce the amount of light seen from distant areas. The Proposed Action would have minimal additive cumulative impacts to visual resources when compared to past, present, and foreseeable activities. The addition of downward-facing and shielded lights would reduce the impacts to the view shed.

The No Action Alternative would have no cumulative impacts to visual resources beyond the impacts from current activities because there would be no additional equipment on site.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The ID Team Checklist provides the rationale for issues that were considered but not analyzed further. The issues were identified through the public and agency involvement process described in section 5.2 and 5.3 below.

5.2 Persons, Groups, and Agencies Consulted

Table 5.2 - List of all Persons, Agencies and Organizations Consulted for Purposes of this EA.

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Northern Band Shoshone, Shoshone-Bannock, Paiute Tribe of Utah, Navajo, Eastern Shoshone, Ute, Hopi, Southern Ute, Ute Mountain, Zuni	Native American Concerns	Tribal notification letters were sent on September 19, 2013. The Hopi Tribe replied with a letter requesting consultation if any resources were identified in a cultural survey that may be impacted. A letter from the Paiute Tribe was received deferring to other tribes in the area.
Carbon County Public Lands: Access and Safety Department	ROW Encroachment	Carbon County supports the proposed project and will accept applications for encroachment and utility lines within their ROW.
State Historic Preservation Office (SHPO)		SHPO concurrence is dated December 2, 2013.

5.3 Summary of Public Participation

During preparation of this EA, the public was notified of the Proposed Action by posting details on the Environmental Notification Bulletin Board on September 12, 2013. Carbon County sent a letter dated September 23, 2013 in support of the project. One letter was received from the public concerning the Proposed Action on March 4, 2014. The subject of the comments and response is described in Section 1.7 of this EA. The public comment period for this EA was open from May 6 and extended until June 19, 2014. During this time, comments were received from 3 parties. Received comments and responses to those comments are included as Appendix F. Comments in common to multiple groups or individuals were combined into one comment, where applicable, and subsequently addressed in response. Comments that were not considered substantive, e.g. opinions or preferences, did not receive a formal response, but were considered in the decision-making process.

5.4 List of Preparers

Table 5.4 - List of Preparers

5.4.1 BLM

Name	Title	Responsible for the Following Section(s) of this Document
Amanda Harrington	Realty Specialist	Project Lead, Editing
Connie Leschin	Realty Specialist	Project Lead
Leonard Herr	Air Quality Physical Scientist	Air Quality
Colin Schwartz	Air Technician	Air Quality
Amber Koski	Archaeologist	Cultural Resources
Jared Reese	Wildlife Biologist	Fish and Wildlife Excluding USFW Designated Species and BLM Sensitive Species
Stephanie Bauer	Rangeland Mgmt. Specialist	Invasive Species/Noxious Weeds
Jared Reese	Wildlife Biologist	Threatened, Endangered or Candidate Animal Species
Floyd Johnson	District Safety Manager	Wastes (hazardous or solid); Water Resources/Quality (drinking/surface/ground)
Dana Truman	Rangeland Mgmt. Specialist	Vegetation Excluding USFW Designated Species and BLM Sensitive Species
Josh Winkler	Outdoor Recreation Planner	Visual Resources

5.4.2 Non-BLM Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Mel Coonrod	Owner, EIS	Editing, Impact Analysis
Matthew Serfustini	Biologist, EIS	Drafting, Editing
Tom Paluso	Professional Engineer, EIS	Editing, Plan of Development
Mike Coonrod	HR and Safety, EIS	Editing

6.0 REFERENCES

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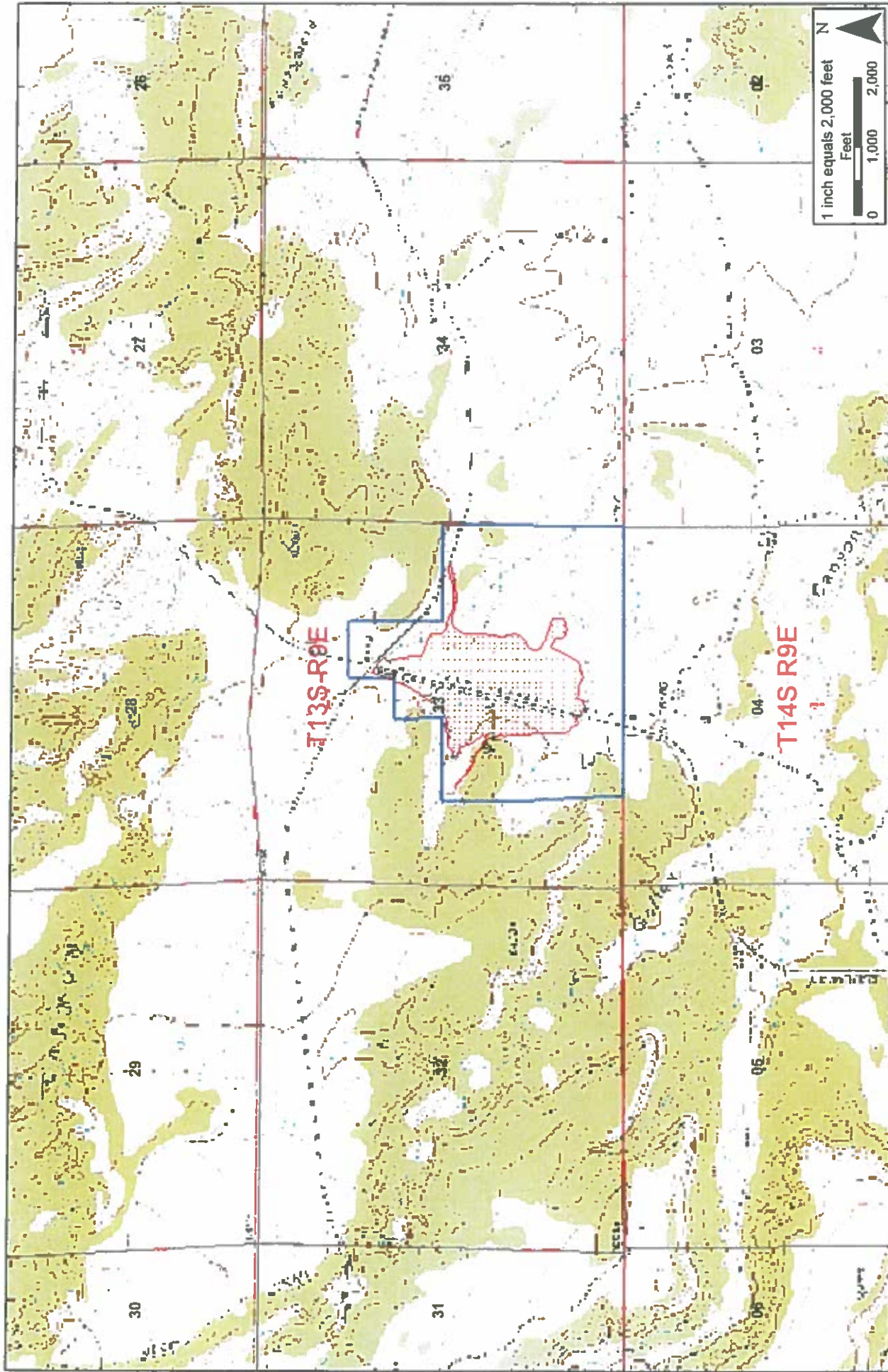
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FIGURES

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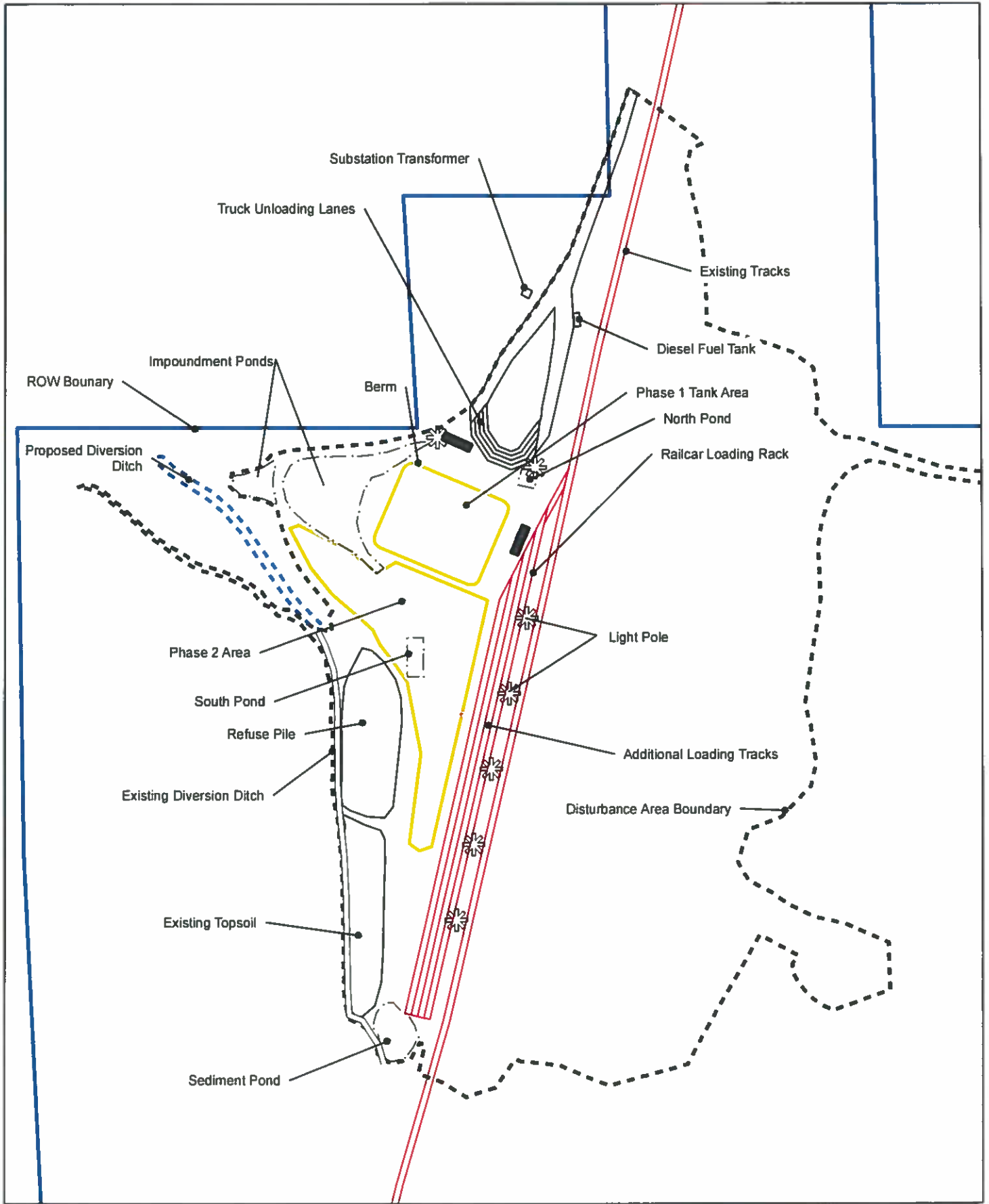


Legend
 Existing Facility
 ROW Area

Section 33
 Township 13 South
 Range 9 East
 SLBM

Wildcat Loadout Modification EA
 BLM Lease U-48027
 General Location

Figure 1



Wildcat Loadout Modification EA
 BLM Lease U-48027
 Site Layout

Figure
 2

