July 2025

Wildcat Loadout Facility Right-of-Way Amendment

Environmental Assessment **DOI-BLM-UT-2025-0015-EA**

Consumers Road, Carbon County Utah
Salt Lake Meridian,
Township 13 South, Range 9 East
Section 33, SWNE, SENW, E1/2SW1/4

U.S. Department of the Interior
Bureau of Land Management
Price Field Office
120 South 600 West
Price, Utah 84501

Table of Contents

CHAPTER 1. INTRODUCTION

1.1. Background

Project proponent Coal Energy Group 2, LLC (CEG2) is the current holder of a Bureau of Land Management right-of-way (ROW) where the Wildcat Loadout Facility is located, UTUT106262560 (legacy number UTU-48027). (See Figure 1-1).

The BLM first issued the Wildcat Loadout Facility ROW in 1982 for the purpose of transloading coal from trucks to railway cars. The coal transloading facilities remain at the ROW but are no longer functional and have been idled since 2016.[1] In 2013, the ROW holder began transloading oil using mobile facilities under 43 CFR 2801.5 (b). In 2014, the BLM authorized development of permanent transloading facilities on the west side of the ROW for crude oil (DOI-BLM-2013-0063-EA). The developments listed in Table 1-1 were analyzed and approved in 2014:

Table 1-1: Modifications/Additions approved in the 2014 EA

Permanent Modifications/Additions Approved in 2014 EA
2 - 100,000-barrel crude oil storage tanks and 2 - 20,000-barrel crude oil storage tanks
1 - 5,000-gallon tank containing water with foam/fire suppressant
4 - Stationary truck unloading lanes (truck to storage tank)
4 - Fixed pumps with piping to load from truck to tank
Up to 4 - Additional loading railway tracks
1 - Additional dual-sided loading railway track
1 - Vapor Combustion Unit (VOC), smokeless, natural draft assisted, and enclosed vapor combustor
1 - Drainage ditch and two proposed sediment ponds for runoff
12 - Down shielded light posts at truck unloading lanes, tank area, and railcar loading tracks
71 - Light pollution shields for existing lights
1 - Transformer substation
1 - 10,000-gallon self-contained diesel fuel tank adjacent to truck unloading lanes

[1] *The coal loadout operation involved three truck dumps, a railway car loading track, and various conveyor belts, as well as structures to facilitate reclaiming, crushing, storing, and loading coal. The mine that historically used the coal transloading facilities is closed, abandoned, and in the process of being reclaimed. If the ROW holder wants to resume coal transloading operations at the ROW, it would need further authorization from BLM (in a new, appealable decision) to reconfigure and upgrade the coal transloading facilities.*

Companies currently under contract with the Wildcat Loadout Facility[2] have oil tanker trucks that load crude oil at their wells in Duchesne and Uintah counties, then transport the oil along various oil field and local roads, Highways 40, 191, and 6, and Consumers Road to the Wildcat Loadout Facility (see Figure 1-2). The oil tanker trucks enter the Wildcat Loadout Facility utilizing an access road on the west side of rail tracks. Crude oil is then transferred from the oil tanker trucks to the railway cars utilizing mobile pumping stations. Once approximately thirty-five (35) loaded railway cars are assembled into a unit, Utah Railway transports the unit to the Martin Yard in Helper, Utah. Three units (one-hundred four (104) railway cars) are assembled into a train at the Martin Yard, and then enter the Union Pacific, and the Burlington Northern Santa Fe Railways railway system for shipment to refineries in Texas and Louisiana on the Gulf Coast (see Figure 1-3).

CEG2 proposes to amend the ROW to reconfigure and expand its transloading facilities at the Wildcat Loadout Facility. The modifications would change the site layout and add facilities such as an oil tanker truck, unloading racks, oil storage tanks, a vapor combustion unit, railway car loading racks, and a motor control unit within 30 acres of previously disturbed lands within their current 270-acre ROW. Although many of these developments and changes were part of the 2014 decision, some were never installed due to geotechnical testing of the soils and because most facilities would have occurred in a stormwater retention/infiltration basin. The newest proposal changes the location of these facilities to be located on the east side of the ROW in part to address the earlier soils and stormwater issue, and to allow safer traffic flow on and off Consumers Road. Table 1-2 compares the 2014 approval to the 2025 application.

Table 1-2: Comparison of Facilities between the 2014 EA and the 2025 Application

Modifications/Additions Approved in 2014 EA for the West Side of the Tracks	**Status [3]**	**2025 application Proposed Modifications/Additions for the East Side of the Tracks**
2-100,000-barrel crude oil storage tanks and 2-20,000-barrel oil storage tanks	Never installed	2-heated, 80,000-barrel crude oil storage tanks
1-5,000-gallon tank containing water with foam/fire suppressant	Installed	No change
4-stationary, dual-sided truck unloading lanes	Never installed	10-stationary, dual-sided truck unloading lanes
4-fixed pumps with piping at the unloading lanes to load from truck to tank	Never installed	10-fixed electric pumps and piping at the unloading lanes to transfer from truck to tank
Up to 4-additional rail tracks	Installed 1 rail track	3-additional rail tracks
1-dual-sided railway car loading rack	Never installed	12-dual-sided railway car loading racks
1-Vapor combustion unit that would be 96 inches in diameter by 20 feet high	Never installed	1-Vapor combustion unit that would be 96 inches in diameter by 40 feet high

[2] The primary shippers using the Wildcat Loadout Facility are Uinta Wax Operating, LLC, Finley Resources, Inc, Scout Energy Management, LLC and Wasatch Energy Management, LLC, however the facility is open to any producers that need to transport their product.

[3] CEG2 will not install anything approved in 2014 that has not already been installed. The currently submitted Plan of Development (POD), if approved, will become the POD for the ROW, and the other decision will be replaced.

Modifications/Additions Approved in 2014 EA for the West Side of the Tracks	Status [3]	2025 application Proposed Modifications/Additions for the East Side of the Tracks
1-Drainage ditch and 2-proposed sediment ponds for runoff	Installed	Fill in 1 pond and extend a second, move a topsoil pile and remove a culvert to accommodate the trucks
Approximately 12-new down shielded light-posts at truck unloading lanes, tank area, and railcar loading tracks	Not installed	10-lights for truck unloading lanes, 15-lights for railway car loading racks, tank lighting, 13-lights for transfer pump, 1-light at vapor combustion unit. All lights would be down shielded.
71-Light pollution shields for existing lights	Installed	No change
1-Transformer substation	Installed	No change
1-10,000-gallon self-contained diesel fuel tank adjacent to truck unloading lanes	Installed	No change
N/A	N/A	1-Motor Control Center
N/A	N/A	3-electric pumps for loading from tank to railway car and one electric pump as a "hot spare" for pumps taken out of service for maintenance or repairs

In 2024, Utah Candle Company, LLC acquired a 30-year lease from the Utah Trust Lands Administration (TLA) on 51.61 acres of TLA lands adjacent to the Wildcat Loadout Facility (see Figure 1-4). Wildcat Loadout has an agreement with Utah Candle Company, LLC to expand the Wildcat Loadout Facility onto this lease should BLM reject their ROW amendment request.

On May 1, 2025, CEG2 requested that BLM process its Wildcat Loadout Facility ROW amendment under alternative arrangements for NEPA compliance.[4] On June 19, 2025, the request was approved by the Acting Assistant Secretary – Land and Minerals Management.

This Environmental Assessment (EA) has been prepared to analyze the potential impacts to the environment that could result from implementation of the Proposed Action, as compared to the No Action Alternative.

[4] *The President issued Executive Order (EO) 14156 "Declaring a National Energy Emergency" on January 20, 2025, which directed heads of executive departments and agencies to "facilitate the … transportation, refining, and generation of" energy resources on Federal lands. Secretary's Orders No. 3417 and 3418 implemented provisions of EO 14156 and directed Bureaus and Offices under the Department of the Interior to identify any emergency authorities to facilitate "energy projects" as defined by EO 14156. On April 23, 2025, the Council on Environmental Quality (CEQ) authorized the use of alternative arrangements to comply with the National Environmental Policy Act (NEPA) before taking urgently needed actions (43 Code of Federal Regulations (CFR) 46.150) for projects that respond to the national energy emergency.*

Figure 1-1: Wildcat Loadout Facility

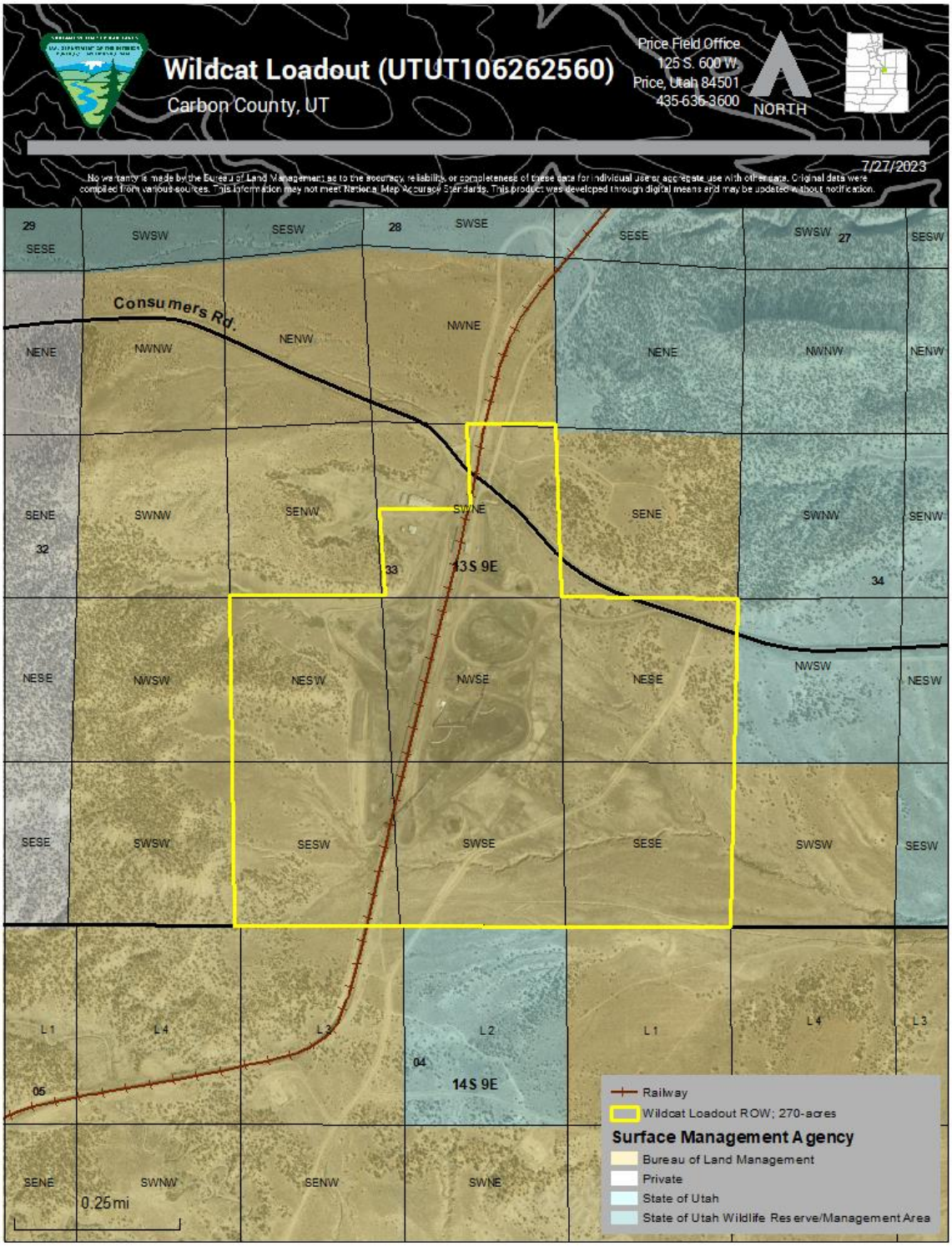


Figure 1-2: Oil Tanker Trucks Transportation Routes

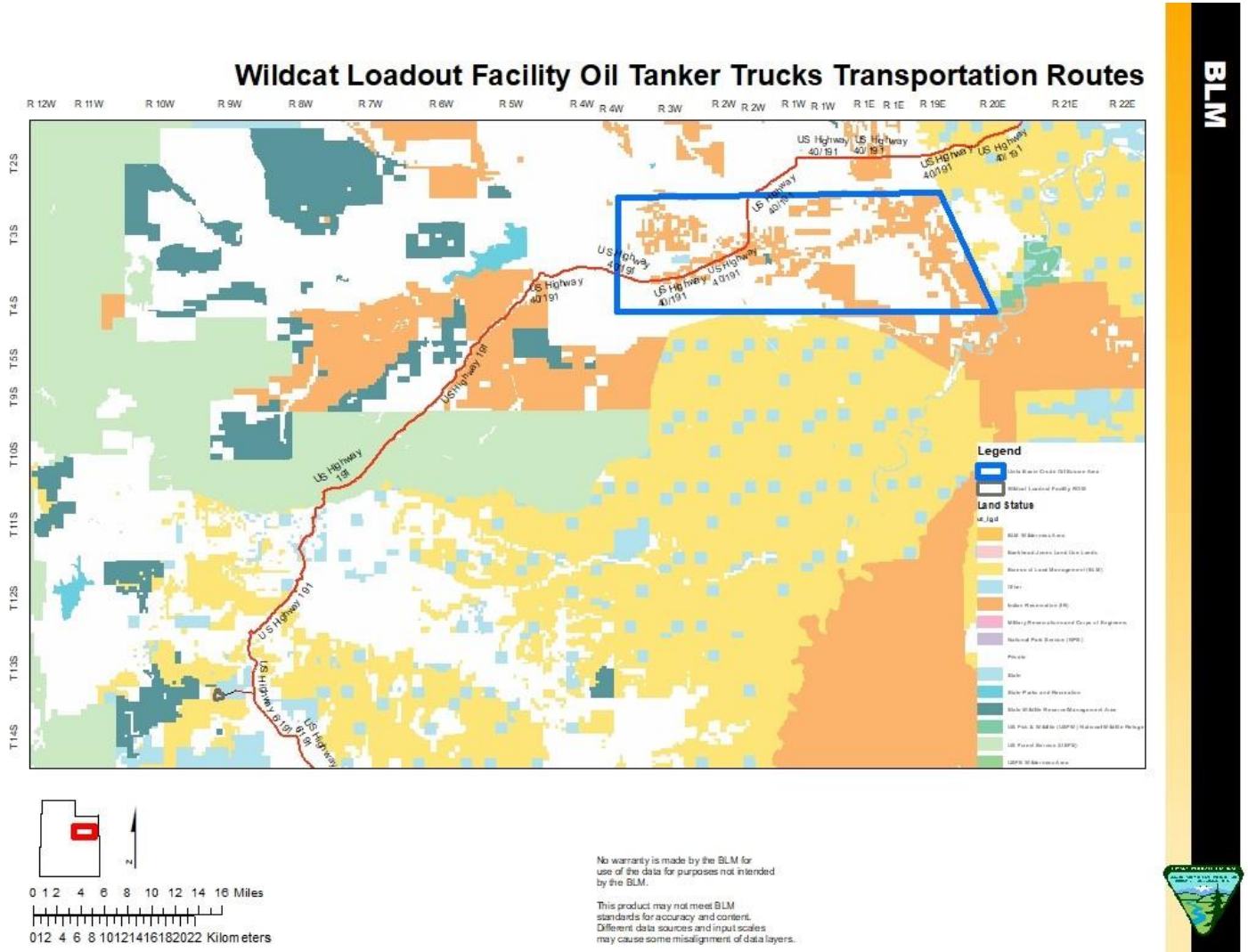
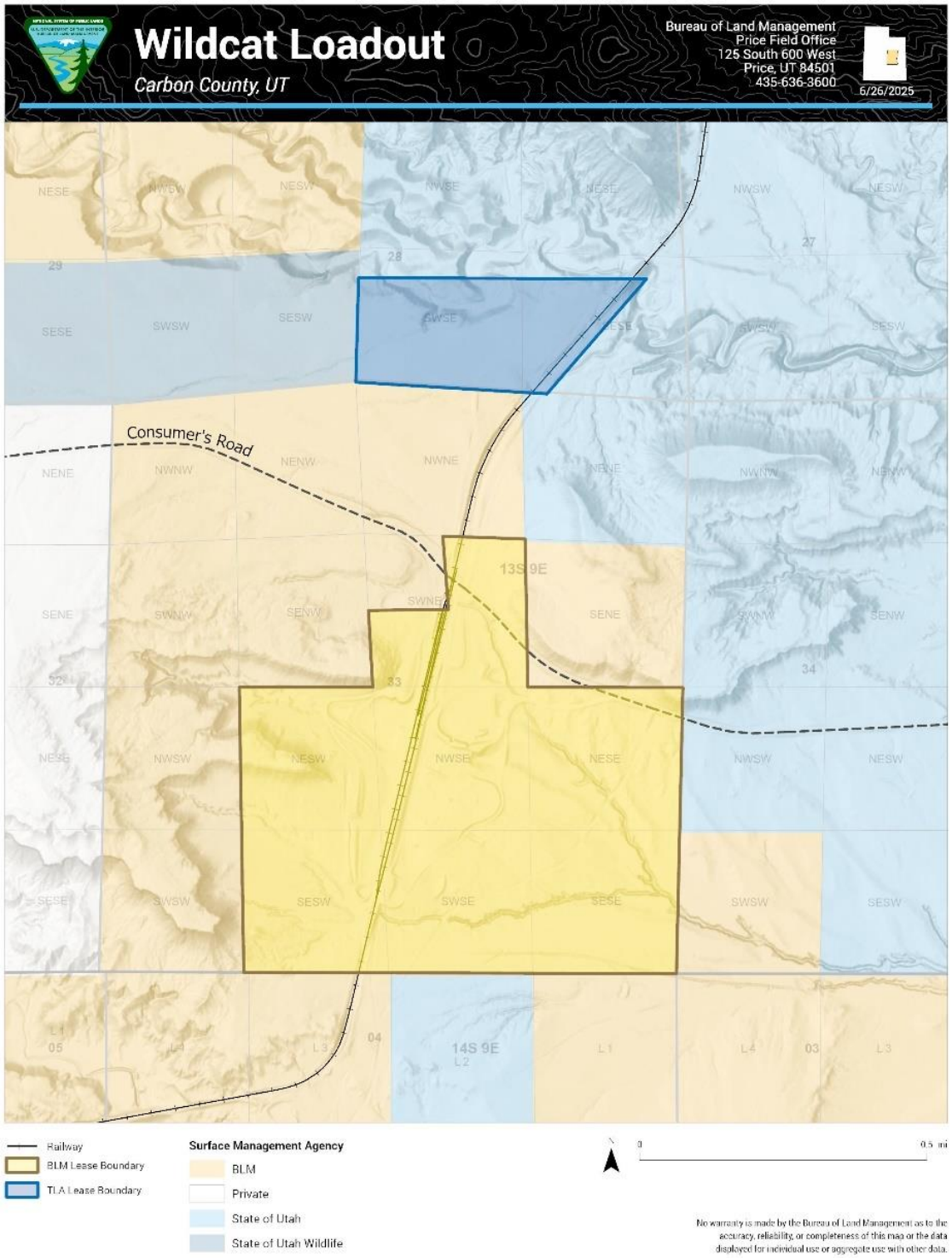


Figure 1-3: Railway Transportation Routes

Figure 1-4: Leased TLA Lands Adjacent to Wildcat Loadout Facility



1.2. Purpose and Need

The purpose and need of the federal action are to consider an application for an amendment to ROW UTUT106262560 to change the facility layout and add facilities. The need is BLM's statutory and regulatory responsibilities regarding ROW applications under Title V of the Federal Land Management and Policy Act of 1976 (FLPMA) as amended, and 43 CFR Part 2800.

1.3. Decision to be Made

The BLM will decide whether to grant or deny the ROW amendment, which serves as the authorization for the proposed modification, and under what terms and conditions.

1.4. Conformance with the Land Use Plan

Land Use Plan Name: Price Field Office Record of Decision (ROD) and approved Resource Management Plan (RMP) as amended by the 2015 Utah Greater Sage Grouse Approved Resource Management Plan Amendment.

Date Approved: October 2008

The Proposed Action is in conformance with the applicable land use plan because it is consistent with the RMP decision(s) (objectives, terms, and conditions) listed in Table 1-3.

Table 1-3: Conformance with the Land Use Plan

RMP decision(s) (objectives, terms, and conditions)	How the project conforms
Lands and Realty (LAR) Objective: Maintain availability of public lands to meet the habitation, cultivation, trade, mineral development, recreation, and manufacturing needs of the external customers and the general public (page 115).	The project would provide additional transloading capacity for developed minerals (crude oil) to additional markets.
LAR-28: Additional ROWs will be granted consistent with RMP goals and objectives.	The project would be a ROW amendment.
MA-LR-5: In GHMA, manage ROWs, permits, and leases as follows (Figure 2-11): □ Open: 484,900 acres □ Avoided: 0 acres □ Excluded: 17,600 acres New ROWs (including permits and leases) authorizations will be allowed if they apply the pertinent management for discretionary activities in GHMA identified in MA-SSS-5.	The Proposed Action is a modification of an existing ROW in an area open to ROWs. In addition, MA-SS-5 (net conservation gain, buffers, and required design features) does not apply because it is not a new ROW.

1.5. Relationship to Statutes, Regulations, Policy, Orders, and other Plans

The Proposed Action is related to the statutes, regulations, policies, orders and other plans are directly listed in Table 1-4.

Table 1-4: Relationship to Statutes, Regulations, Policies, Orders and other Plans

Statutes, Regulations, Policies, Orders and other Plans	How the Project Relates
FLPMA of 1976, as amended, Title V and its implementing regulations at 43 CFR 2800	The project is a FLPMA Title V ROW modification on Federal Lands.
Utah Greater Sage-Grouse Approved Resource Management Plan Amendment.	The ROW is in lands identified as General Habitat Management Area (GHMA) for Greater Sage-grouse.
Transportation regulations at Title 49 of the Code of Federal Regulations	Crude oil that would be transported by oil tanker truck or railway car and transloaded through the facility is under the jurisdiction of the Department of Transportation (oil tanker trucks), the Federal Railroad Administration (railway cars) and the Pipeline and Hazardous Materials Safety Administration (hazardous materials).
Clean Air Act (CAA) of 1970 and its Conformity Regulations at 40 CFR 93B	The project transports crude oil originating in the Uinta Basin's nonattainment area. Oil production in the Uinta Basin is subject to the CAA conformity regulations.
Clean Water Act (CWA) of 1973 and its Spill Prevention Control and Countermeasure (SPCC) regulations at 40 CFR 112.7 which regulate oil storage spill prevention and response.	The installation of storage tanks would include earthen berms constructed around them to conform with the SPCC Plan for the Wildcat Loadout Facility site.
Utah Department of Water Quality Storm Water Permits	The project requires a permit from Utah Department of Water Quality regarding handling of stormwater on industrial facilities.
Utah Division of Air Quality (DAQ) New Source Review Permits	The project requires a permit from Utah DAQ regarding handling of emissions from industrial facilities. CEG2 holds a Utah DAQ Approval Order for the facility.
Utah Resource Management Plan (2024)	The project falls within the Utah Resource Management Plan's commitment to have Utah support national energy independence.
Carbon County Resource Management Plan (2022)	The project falls with Carbon County Resource Management Plan's policy to maintain existing access without any restrictions or impediments other than those which are naturally occurring, such as winter closures, landslides, or other events which are beyond the control of man. Carbon County's Resource Management Plan defines access as all modes of transportation including improvements to get product to market.
EO 14156, Declaring a National Energy Emergency, implemented by Secretary's Order 3417, Addressing the National Energy Emergency	The proposed ROW modification would transload domestic crude oil from truck to train for transportation to market. On May 1, 2025, CEG2 submitted a request in writing to BLM to use the alternative arrangements for NEPA compliance. On June 19, 2025, their request was approved.
EO 14154, Unleashing American Energy, implemented by Secretary's Order 3418, Unleashing American Energy	The proposed ROW modification would facilitate transloading of domestic crude oil from truck to train for transportation to market.

1.6. Scoping and Issues

During the internal scoping process, the BLM Interdisciplinary (ID) Team reviewed the SF-299 and Plan of Development for the proposed ROW amendment and completed an ID Team checklist to identify issues related to resource values and land uses that could be affected. Under the alternative arrangements being used for NEPA compliance because of the national energy emergency described in EO 14156, the Responsible Official is not required to seek public comment prior to finalizing the EA, finding of no significant impact, or any decision. The project was listed on the BLM National NEPA Register on June 18, 2025.

The BLM ID team identified the following issues as requiring detailed analysis in the EA.
Issue 1: What impacts would occur because of the increase in Consumers Road truck traffic?
Issue 2: What impacts would occur because of the increase in rail traffic between Wildcat Loadout Facility and Martin Yard?

The BLM also analyzed in brief an additional 26 issues and determined a detailed analysis was not warranted for these issues for the reasons discussed in Appendix A. The brief analysis includes a concise discussion regarding the affected area and degree of impacts related to each issue. Those resources listed in Appendix A were determined to have no potential for significant impacts.

Some resources are not associated with potential issues because they are not present or would not be impacted appreciably by the Proposed Action. Those resources are listed in Table 1-5 along with explanations concerning why no analysis is needed.

Table 3-1-5: Resources for Which No Analysis is Necessary

Resource	Rationale for Why No Analysis is Necessary
BLM Natural Areas	Per BLM Utah Corporate Data review, the nearest natural area is the Mexican Mountain Wilderness Characteristic Protection Area, located 43 miles away.
Designated Areas: Areas of Critical Environmental Concern (ACEC)	Per review of the BLM National Dataset, the nearest ACEC is the Cleveland Lloyd Dinosaur Quarry ACEC, 26 miles away.
Designated Areas: Wild and Scenic Rivers (WSR)	Per review of the BLM National Dataset, the nearest WSR is the Green River Wild Segment, 53 miles away.
Wilderness	Per review of the BLM National Dataset, the nearest wilderness is Desolation Canyon Wilderness in Emery County, 35 miles away.
Jurassic National Monument (JNM)	Per review of the BLM National Dataset, the project is located 25 miles from JNM.
National Historic Old Spanish Trail	Per review of the BLM National Dataset, the project is located 31 miles from the Old Spanish Trail.
San Rafael Swell Recreation Area	Per review of the BLM National Dataset, the project is located 31 miles from the Recreation Area.
Wilderness Study Areas (WSAs)	Per review of the BLM National Dataset, the nearest WSA is Desolation Canyon WSA in Carbon County, 38 miles away.
Lands with Wilderness Characteristics	Per BLM Utah Corporate Data review, the proposed ROW is not within a lands with wilderness characteristics unit. The nearest inventoried unit, Price River, is 20 miles away.
Plants: BLM Sensitive	Based on GIS review, elevation, geology data and occurrence records, there are no BLM sensitive plant species or habitat present in the area. The closest known habitat is located approximately 7 miles to the southeast.

Resource	Rationale for Why No Analysis is Necessary
Plants: Threatened, Endangered, Proposed, or Candidate	Based on GIS review, elevation, geology data and occurrence records, there are no Threatened, Endangered, Proposed or Candidate plant species or habitat present in the area. The closest known habitat is located approximately 8 miles to the southeast.
Water: Water Rights	Per review of Utah Division of Water Rights dataset, there are no Water Rights within the ROW. Within a 1-mile radius of the ROW there are approximately 3 water rights per review of Utah Division of Water Rights dataset. The water rights are upstream and in the next drainage over from the ROW. No withdrawal is occurring for the ROW. Due to the flow direction and topography of the water rights in relation to the ROW, there is no potential for impacts that warrant detailed analysis.
Wild Horses	Review of GIS data shows that the ROW is not within a Wild Horse or Burro Herd Management Area. The nearest herd management area (Range Creek) is 30 miles away.
Woodlands/Forestry	According to site visit and the Price Field Office (PFO) RMP there are no woodland/forestry products within the ROW as it has been previously disturbed and has been not identified as an area for harvest of woodlands/forestry products.

CHAPTER 2. DESCRIPTION OF ALTERNATIVES

This chapter describes the alternatives considered by the BLM during preparation of this EA. The BLM analyzed two possible alternatives: Alternative A - No Action Alternative and Alternative B - Proposed Action. Each alternative describes the proposed expanded facilities at the Wildcat Facility ROW. Transportation routes are common to both alternatives and are described in section 1.1 (see Figures 1-2 and 1-3).

2.1. Alternative A – No Action

Under the No Action alternative, the BLM would deny the ROW amendment application, and crude oil truck-to-train transfer would continue as is currently occurring at the Wildcat Loadout Facility. The ROW grant would expire on December 31, 2034. For pictures of the existing Wildcat Loadout Facility and TLA Loadout Development, see https://wildcatmidstream.com/. If BLM denies the application, CEG2 will construct the proposed facilities on the adjacent 51.61-acre TLA parcel instead (see section 3.2.1).

2.1.1. Existing Wildcat Loadout Description

Under the No Action alternative, the operation at the Wildcat Loadout Facility would continue as currently approved. The operations occur 24 hours a day, seven days a week. These operations are described in the following subsections. Figures 2-1, 2-2, and 2-3 are Google Earth aerial photographs of the existing operations layout. Figure 2-1 shows Consumers Road (green line), the Wildcat Loadout Facility, and the railway between the Wildcat Loadout Facility and the Martin Yard (grey line). Figure 2-2 shows the existing Wildcat Loadout Facility layout. Figure 2-3 shows the existing rail layout and a truck transloading into a railway car.

The ROW expires on December 31, 2034, but CEG2 may request to renew the ROW prior to expiration.

CEG2 employs approximately 32 full time employees. Many ancillary jobs (such as oil tanker truck contractors) are also supported by the operation. The operations that would occur on the TLA leased lands are anticipated to require up to 13 more employees.

Figure 2-12: Consumers Road, Wildcat Loadout Facility, and Railway to Martin Yard

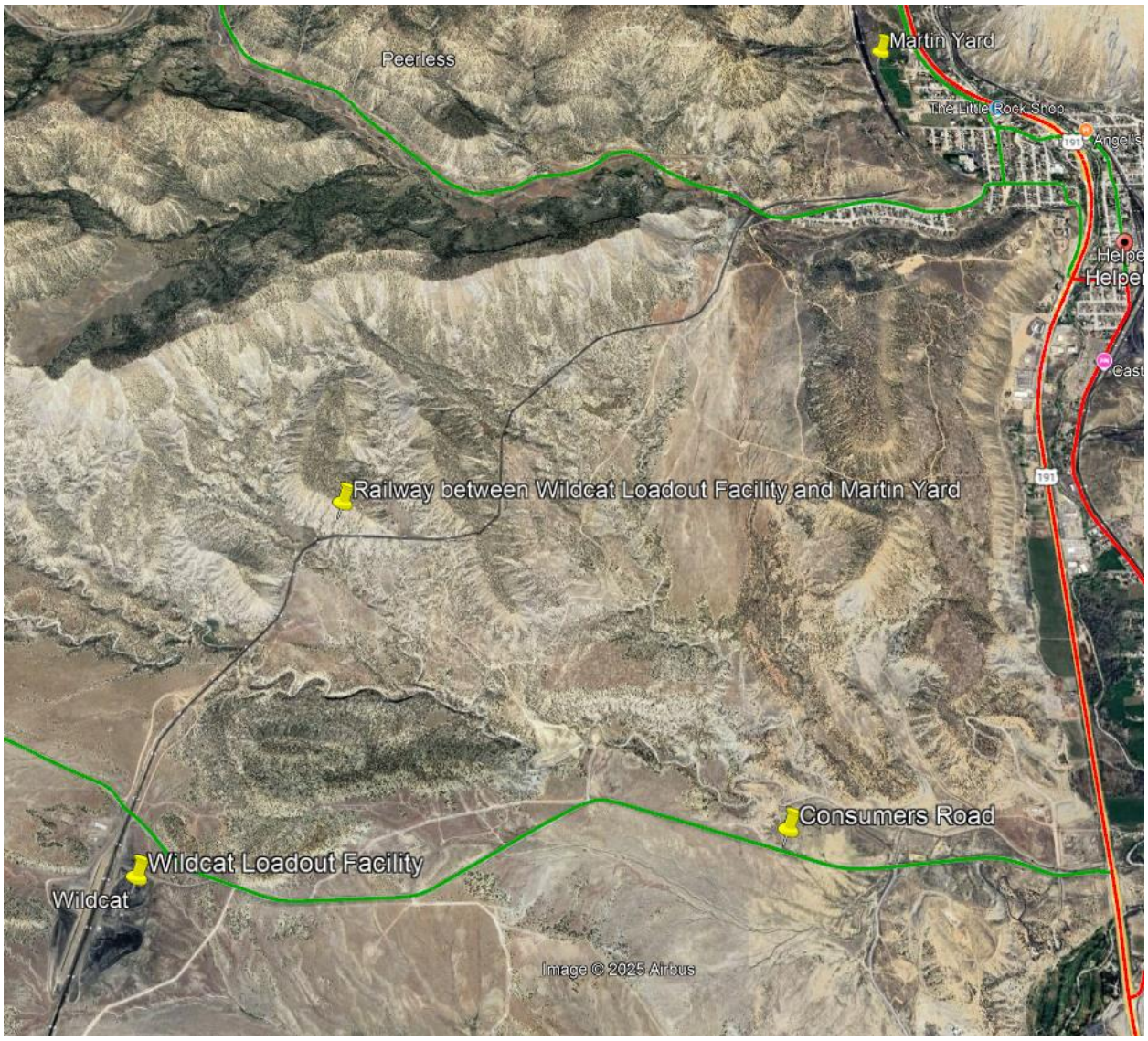
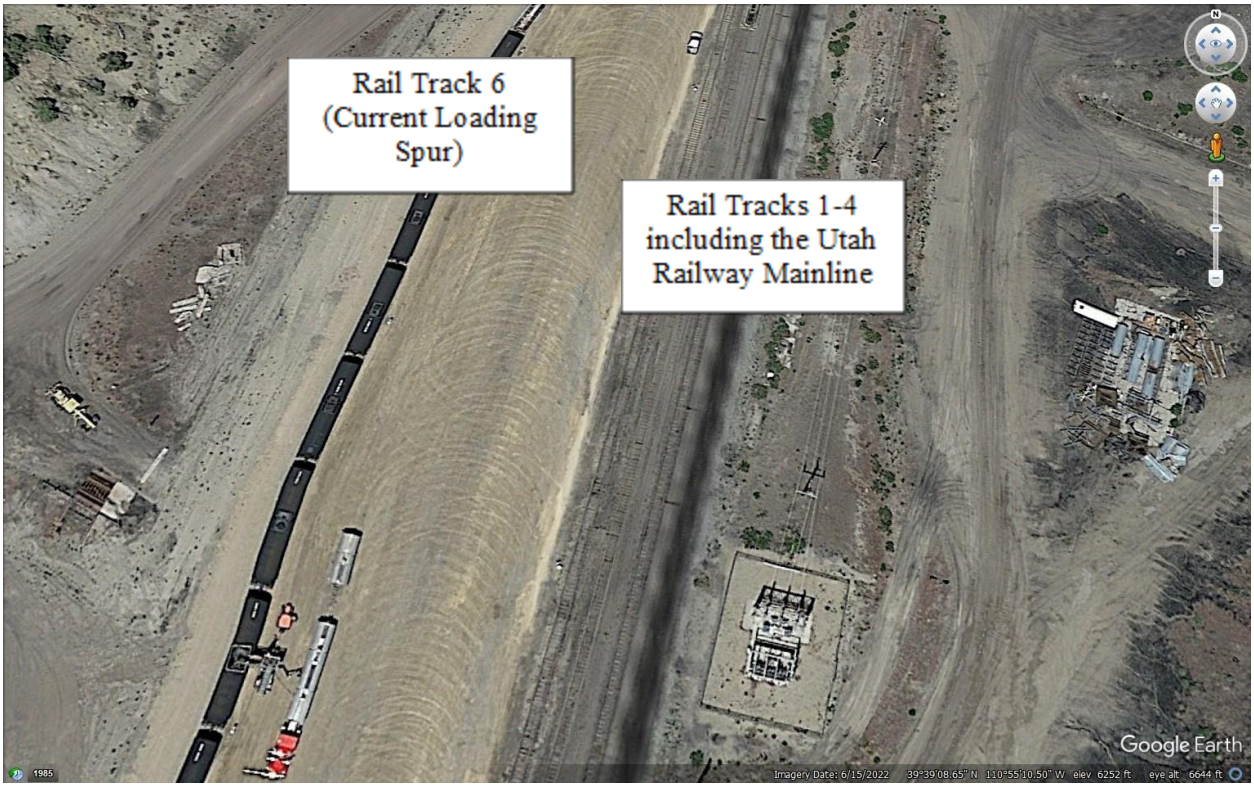


Figure 2-2: Existing Wildcat Loadout Facility Site Layout

Figure 2-33: Existing Wildcat Loadout Facility Site Layout



2.1.1.1. Transloading

The Wildcat Loadout existing facilities for transloading the crude oil from the oil tanker truck to the railway car are described in section 2.1.1.4.

2.1.1.2. Oil Tanker Trucks

CEG2's contractors make approximately 77 oil tanker truck deliveries of crude oil per day to the ROW site. CEG2 estimates that a single oil tanker truck makes two (2) to three (3) deliveries per day. This means there are between 26 and 38 physical oil tanker trucks on the road or an average of 32 oil tanker trucks over a 24-hour period.

2.1.1.3. Truck Ingress and Egress

Oil tanker trucks enter the Wildcat Loadout Facility from Consumers Road (see Figure 2-1) through an existing access road on the west side of the rail tracks. Once on site, trucks proceed southwest to the mobile pumping stations. The empty trucks U-turn and exit the facility on the same access road. Figure 2-2 is a Google Earth aerial photograph of trucks accessing and leaving the facility.

2.1.1.4. Oil Tanker Truck to Railway Car Transloading Facilities

CEG2 has six (6) mobile pumping stations on the west side of the property, which allows up to six (6) oil tanker trucks to unload simultaneously, and directly into the railway cars through a closed system. Figure 2-3 is a Google Earth aerial photograph of a truck transloading onto a railway car. Each mobile pumping station is equipped with a 20 Horsepower, 355 gallons-per-minute fixed pump to transfer the crude oil to the railway cars via hoses connected to the oil tanker trucks. A single truck can unload in approximately sixty (60) minutes including hook up and disconnection of transfer hoses.

2.1.1.5. Vapor Balancing

Emission capture technology at the Wildcat Loadout Facility includes the use of vapor-balance when loading railway cars from the oil tanker trucks. As oil from the oil tanker truck fills the railway car, the vapor in the railway car is displaced by the oil and is returned via a hose to the oil tanker truck. The vapors in the oil tanker truck usually condense back to liquids during the oil tanker truck's return trip, which then mixes in with the next oil load. Any remaining vapors can be combusted at a vapor combustion unit at the well site while the crude oil is transferred into the oil tanker truck.

2.1.1.6. Railway Cars and Oil Trains

At the Wildcat Loadout Facility approximately thirty-five (35) loaded railway cars are assembled into a unit containing approximately 20,000 barrels per day (bbl) of crude oil, then one or more locomotives pull the unit to the Martin Yard. At the Martin Yard, three units are assembled to form one oil train (104 railway cars) for shipment, which is the largest oil train that can be shipped on the rail routes.

Currently the Wildcat Loadout Facility forms one train approximately every three (3) days (up to one (1) unit per day containing approximately 20,000 bbls). The Martin Yard can hold two (2) fully assembled, loaded oil trains with additional space for other railway cars if needed. Utah Railway contracts locomotives from the Union Pacific or the Burlington Northern Santa Fe railroad to remove the oil trains from the Martin Yard.

Locomotive(s) moving loaded railway cars from the Wildcat Loadout Facility to the Martin Yard also deliver empty railway cars to the Wildcat Loadout Facility from the Martin Yard. Empty railway cars for the Wildcat Loadout Facility are stored between approximately milepost 6 and milepost 9 on the Utah Railway mainline. They are separated at any at-grade road-crossings and at other locations to allow wildlife and grazing livestock ingress and egress across the tracks. Road crossings may be temporarily blocked during the movement of railway car units but typically the blockage lasts less than ten (10) minutes.

2.1.1.7. Rail Siding

CEG2 currently leases rail tracks from Utah Railway from milepost 0.25 (1/4 mile from the Utah/Union Pacific Junction) to milepost 9 (Gordon Creek Bridge) on the Utah Railway mainline and the associated ancillary tracks located at the Martin Yard. Rail Tracks #1 through

#4 sit within the Utah Railway ROW UTUT106155575 (Legacy Number UTSL-0-015794). Rail Track #65 sits within CEG2's Wildcat Loadout Facility ROW UTUT106262560. Figure 2-3 is a Google Earth aerial photograph with an overlay of the rail tracks labels. The rail tracks are as follows:
Rail Track #2 is the Mainline.
Rail Track #1 connects to the Utah Mainline (Rail Track #2) beyond the north and south limits of the CEG2's Wildcat Loadout Facility ROW UTUT106262560.
Rail Track #3 is a short spur that connects to Rail Tracks #1 and #4.
Rail Track #4 is currently utilized for railway car loading and connects to Rail Track #2 on the north and south ends of the property.
Rail Track #6 is a current loading rail track within CEG2's Wildcat Loadout Facility ROW UTUT106262560 and connects to Rail Track #1.

2.1.1.8. Other Facilities and Operations

Other facilities in place for transloading the crude oil from the oil tanker trucks to the railway cars are described in the following sections.

Existing Equipment Storage and Office Space

Overlapping CEG2's 270-acre Wildcat Loadout Facility ROW UTUT106262560 is a second CEG2 ROW of 20-acres, UTUT106235040 (Legacy Number UTU-94122). Within ROW UTUT106235040, there is the existing vacant building that served as the mine office with attached garage and a separate garage that was used for storage and for a non-potable water system for the mine office. CEG2 utilizes a single trailer as office space and the existing building as storage for supplies and portable equipment.

Existing Substation

The existing substation consists of a Westinghouse 2,500 KVA (kilo volt-amperes), 46,000 V (volt) to 4,160 V transformer, and capacitors for power factor correction. The substation complies with Rocky Mountain Power and Mine Safety and Health Administration (MSHA) requirements since it was historically used for coal activities.

2.2. Alternative B – Proposed Action

Under the Proposed Action, the BLM would approve the ROW amendment and CEG2 would change the Wildcat Loadout Facility site layout and facilities. Approval of the ROW amendment would enable CEG2 to achieve its currently authorized (under a State permit) throughput of crude oil. The operations would continue 24 hours a day, seven days a week. As part of the ROW amendment the BLM would approve an extension of the ROW grant to December 31, 2044, which is ten years past the current expiration date. If BLM approves the application, CEG2 will construct additional rail siding and storage on the adjacent 51.61-acre TLA parcel (see section 3.2.1).

[5] *There is not a Rail Track #5.*

2.2.1. Wildcat Loadout Description

Figure 2-4 shows the ROW Amendment working area within the boundary of ROW UTUT106262560. Figure 2-5 shows the proposed layout of the ROW Amendment. The operations would be conducted on up to 30 acres of already disturbed lands within the existing 270-acre ROW.

CEG2 estimates the project life to exceed 20 years beyond the present.

CEG2 estimates that approximately forty-five (45) full time employees (13 more than are currently employed at the facility) would be required for full scale operations. Many ancillary jobs (for example, roughly 100 additional oil tanker truck contractors) would also be created consistent with the expansion of operations.

Figure 2-4: Proposed Wildcat Loadout Facility Site Layout

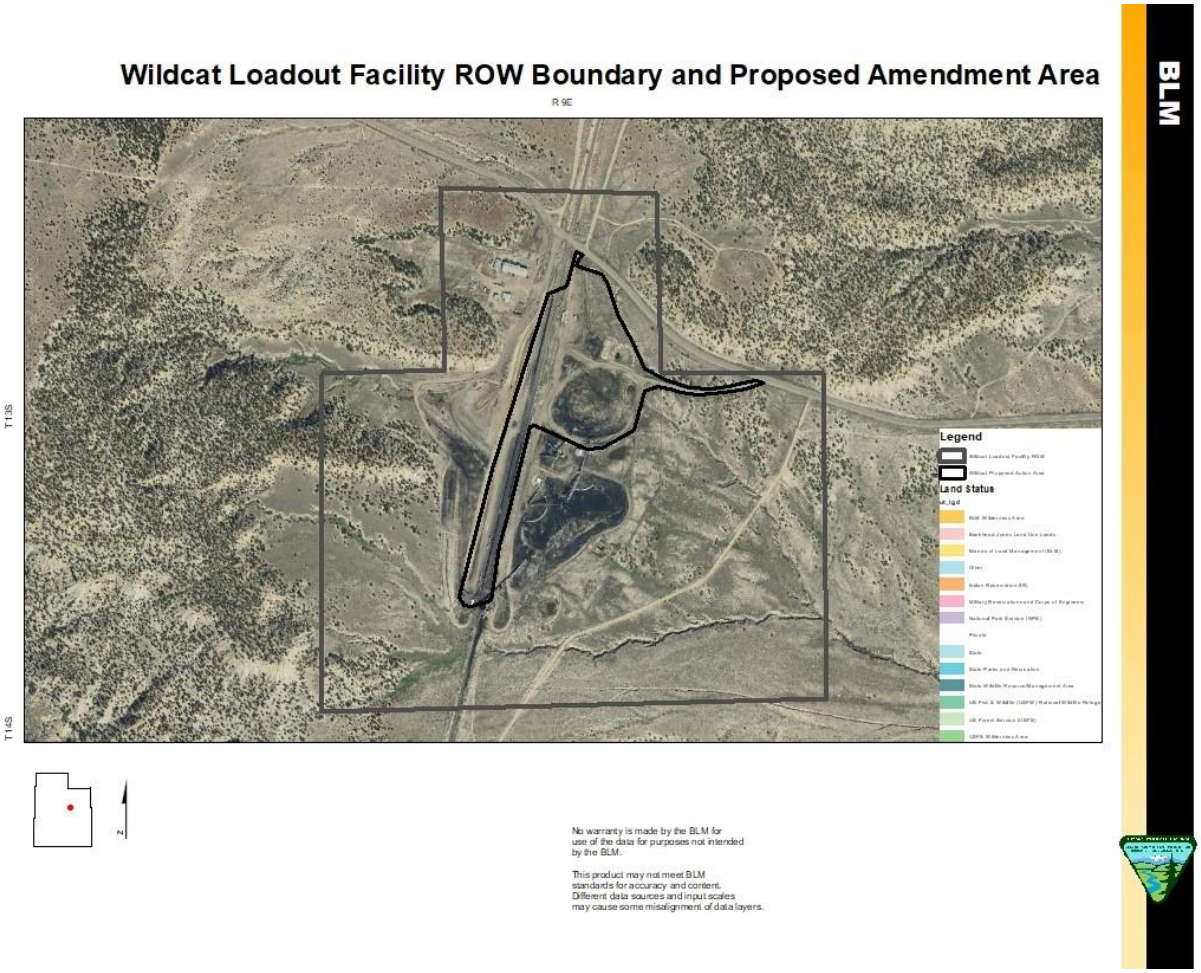
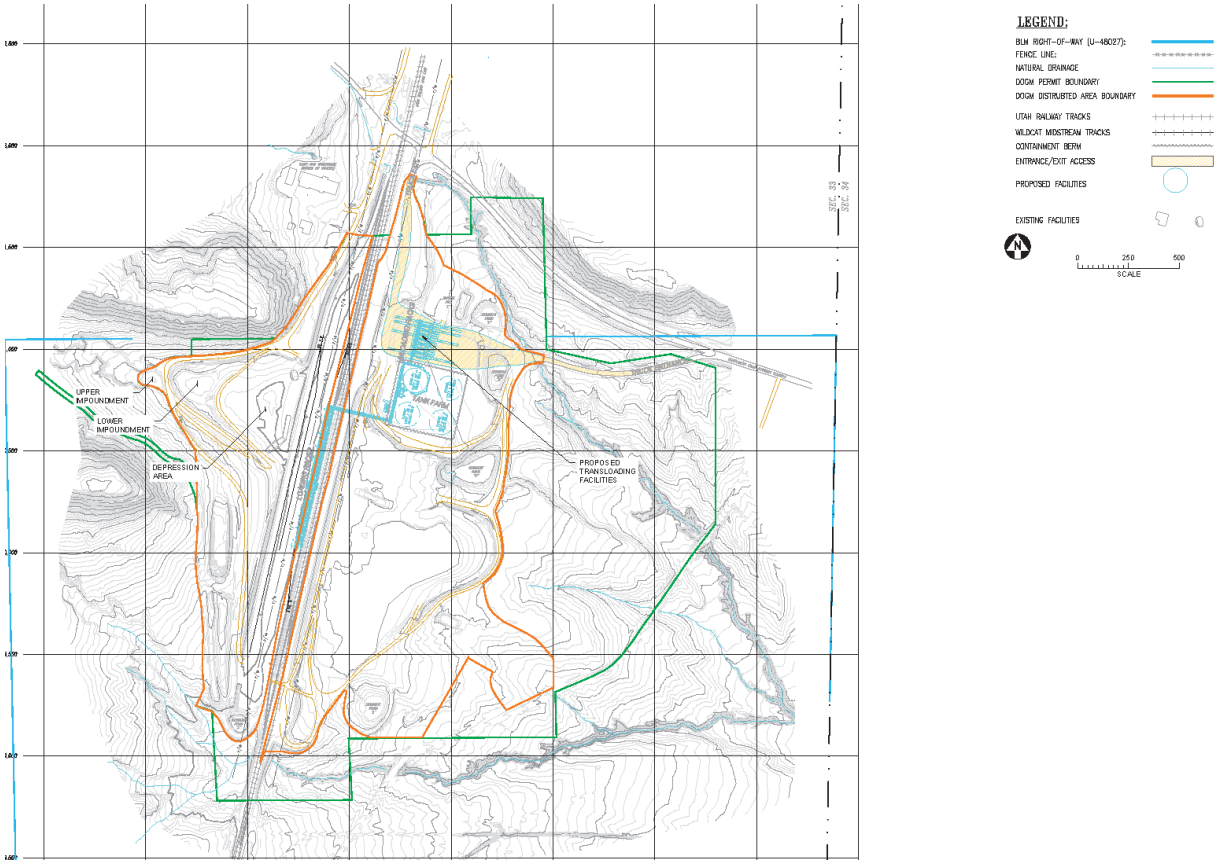


Figure 2-5: Proposed Wildcat Loadout Facility Site Layout



2.2.1.1. Site Grading and Modification

To accomplish the Proposed Action, CEG2 would need to prepare the previously disturbed existing site for the new facilities. CEG2 proposes to:

- Regrade the surface facilities on the east side of the Utah Railway rail track to accommodate vehicle traffic, petroleum storage, promote drainage, and reduce erosion.
- Maintain the road at a maximum grade of 3.5%.
- Make the loadout truck bays flat with a cross-sectional slope of 1% to ensure proper surface water drainage off this area and into a sedimentation pond prior to being discharged off-site.
- Regrade the existing entrance road east of the drainage crossing.
- Install a secondary containment area designed to accommodate two 80,000-barrel (120’ diameter x 48’ tall) petroleum storage tanks. Containment will be achieved by mechanical compaction of the soils to a 98% proctor. A valved culvert would provide controlled discharge of collected storm water within the secondary containment into the sediment pond.

The regraded existing entrance road access into the loadout truck bays would require filling in the north side of one of the sediment ponds. However, the south end would be extended to retain the runoff volume characteristics required for the drainage area reporting to this pond. Although

the pond includes an approved Utah Pollutant Discharge Elimination System (UPDES) discharge, the point source would not be relocated by this modification. One culvert would be removed to accommodate the area required for the turning radius of the tanker trucks exiting the loadout truck bays. The new culvert would extend east. Drainage ditches have been designed to collect runoff from areas on the northeast end of the facility and divert storm water runoff into a sediment pond. One Topsoil Pile is planned to be moved to another site within the ROW but outside the proposed facility area.

2.2.1.2. Unloading Facilities

The facilities required for unloading the crude oil from the oil tanker trucks into the tank farm are described in Section 2.1.6 through 2.1.10. The maximum unloading capacity is designed to be greater than the currently State-permitted maximum throughput to eliminate the risk of oil tanker truck backup onto Consumers Road.

2.2.1.3. Oil Tanker Trucks

CEG2 proposes to add approximately 268 oil tanker truck deliveries per day to the current 77 truck deliveries, totaling approximately 345 truck deliveries per day. CEG2 estimates that a single oil tanker truck makes two (2) to three (3) deliveries per day. At maximum throughput capacity, CEG2 estimates this would place between 115 and 172 physical oil tanker trucks on the road or an average of 143 oil tanker trucks over a 24-hour period.

2.2.1.4. Truck Ingress and Egress

Oil tanker trucks would enter the Wildcat Loadout Facility from Consumers Road through an existing access road on the northeast side of the facility. Once on site, trucks would proceed west to a multiple lane truck unloading station. For safety reasons, the empty trucks would then exit the facility using a second existing access road adjacent to the rails on the northeast side of the facility (the coal loadout road).

2.2.1.5. Oil Tanker Truck Unloading Racks

CEG2 proposes to install ten (10) truck unloading lanes on the east side of the property where a coal storage area was previously located. The proposed setup would allow up to ten (10) oil tanker trucks to unload simultaneously.

Each unloading lane would be equipped with a 50 Horsepower, 555 gallons-per-minute fixed electric pump to transfer the crude oil to the storage tanks via hoses connected to the oil tanker trucks. CEG2 estimates this equipment would allow a single truck to be unloaded in approximately twenty-two (22) minutes, with a total discharge time of approximately thirty (30) minutes including hook up and disconnection of transfer hoses. With a total of ten (10) unloading lanes this would allow a total of twenty (20) oil tanker trucks per hour to be processed through the facility, leading to a total of approximately 345 oil tanker trucks per day. CEG2 estimates that on average, six (6) or seven (7) oil tanker truck deliveries would be made per half hour.

Oil tanker trucks at the unloading stations would be emptied into the storage tanks through a closed system of carbon steel piping and fixed pumps. All pipes, valves, and fittings from the pumps to the storage tanks would have either electrical heat tracing cables or stainless-steel tubing for the circulation of thermal transfer fluid. All pipes, valves and fittings would be insulated with two inches (2") of fiberglass insulation clad in BLM-approved environmental color Covert Green aluminum sheeting to protect the insulation from weather. The carbon steel piping would be of various sizes to accommodate the maximum flow of product.

2.2.1.6. Oil Tanker Truck Staging

CEG2 estimates that the facility on the east side of the property, east of the unloading bays, contains room for staging approximately twenty (20) oil tanker trucks for a maximum of thirty (30) oil tanker trucks onsite (including the 10 in the loading racks). In addition, if the east side staging becomes backed up, additional staging of oil tanker trucks could be performed on the west side of the property to maintain clear passage of Consumers Road. There is an existing turning basin on the west side of the property that allows the trucks on the west side to turn into the facility.

2.2.1.7. Tank Farm Facilities

Construction would include two (2) permanent internal floating roof carbon steel storage tanks. The two oil storage tanks would have a calculated shell capacity of approximately 88,748 bbls each with a maximum working capacity of approximately 80,000 bbls each. They would store oil until it can be loaded onto a rail car. The diameter of the tanks would be approximately 120 feet and a height of 48 feet. Each tank would be outfitted with a mechanical shoe for vapor release prevention.

The oil in the tanks would be heated with two-inch diameter serpentine heating coil bundles inside the tank. The heat transfer fluid inside the coils would be heated by a natural gas fired hot oil heater. Compressed natural gas would be trucked into the Wildcat Loadout Facility in mobile storage tanks from a supplier and tanks interchanged based on demand.

The tank(s) would be outfitted with an internal electronic level gauge with an external display and an external mechanical gauge board as a primary and secondary means of monitoring the levels in the tank. The primary gauge would be utilized as a High-Level warning device with a warning light and external audible alarm. A secondary and independent High-High Level warning device would be installed with a warning light and external audible alarm.

Individual tank foundations would be designed in accordance with the American Petroleum Institute (API) Standard 650 utilizing geotechnical reports for the soil conditions at the site. The standards include concrete footings, ring wall foundations, tank foundation fill materials, and leak detection. Each tank foundation would also include the installation of cathodic protection to protect the tank floor from corrosion.

The tank construction would be completed on site. Excavation and grading activities would be performed with equipment appropriate for the task, including, but not limited to, track-hoes, back-hoes, graders, and dozers. Tanks would be installed using an appropriately sized crane and other lifting equipment as necessary, portable welding equipment, and scaffolding. The tanks would be insulated using four inches of insulation and clad in a Covert Green-colored aluminum sheeting on the shell and roof to protect the insulation from weather.

Earthen berms, meeting the requirements of 40 CFR 112.7 and National Fire Protection Association 30, 22.11.2.6, would be constructed around the tanks to ensure adequate capacity to capture the content of the single largest tank minus the footprint of other tanks within a diked area, plus sufficient allowance for freeboard to accommodate 10% precipitation or the equivalent of a 24-hour, 25-year storm event. Vehicle access would be provided to the diked area for emergency response, maintenance, and other activities.

2.2.1.8. Loading Facilities

The facilities required for loading the crude oil from the tank farm to the railway cars are described in the following sections (2.1.12 through 2.1.18). Note that the maximum loading capacity is greater than the currently permitted maximum throughput capacity to eliminate the risk of oil tanker truck backup onto Consumers Road.

2.2.1.9. Railway Car Unloading Racks

Twelve (12) dual-sided railway car loading racks (24 total railway car loading spots) would be constructed adjacent to the rail tracks and would be connected to the tanks by carbon steel pipes, valves, and fittings to accommodate maximum flow to the railway cars. All pipes, valves, and fittings would be traced with either electrical heat tracing cables or stainless-steel tubing for the circulation of thermal transfer fluid, insulated with two inches (2") of fiberglass insulation clad in a Covert Green-colored aluminum sheeting to protect the insulation from weather, and installed aboveground.

There would be three (3) 150 Horsepower, 2,000 gallon per minute electric pumps installed for the loading of railway cars. Three pumps would be utilized during the loading process to achieve a maximum flow rate of 6,000 gallons per minute to the 12 loading racks or a maximum of 250 gallons per minute to each loading spot. A fourth pump (150 Horsepower, 2,000 gallon per minute) would be utilized as a "Hot Spare" for when individual pumps are taken out of service for maintenance or repairs. The maximum loading rate per rail loading spot meets the requirements set forth by the National Fire Protection Association Technical Committee on Static Electricity.

2.2.1.10. Vapor Combustion Unit

An enclosed vapor combustion unit would be installed on the east side of the property to combust any vapors generated during the railway car loading process as required by the Utah Department of Air Quality, Approval Order DAQE-AN150710004-24. The combustion chamber would be approximately 96 inches in diameter and the vertical stack would be approximately 40

feet high. The vapor combustion unit would be smokeless, forced draft, and air and gas assisted. The pilot gas and assist gas would be compressed natural gas. The vapor combustion unit is designed to combust the vapors at a maximum crude oil flow rate of 6,000 gallons per minute to match the maximum liquid loading rate.

Vapor hoses with detonation arrestors would be connected to each railway car during the loading process. Vapors would be routed to a common header from each railway car to the combustion unit. Drip legs and knock-out pots would be located along the common header to remove any liquids. Liquids would be pumped to the loading racks for reentry into the product stream.

2.2.1.11. Railway Cars and Oil Trains

At the Wildcat Loadout Facility approximately thirty-five (35) loaded railway cars are assembled into a unit containing approximately 20,000 bbl of crude oil, then one or more locomotives pull the unit to the Martin Yard. At the Martin yard, three units are assembled to form one oil train (104 railway cars) for shipment, which is the largest oil train that can be shipped on the rail routes.

Under the Proposed Action, the Wildcat Loadout Facility would load 1.7 trains every day (up to five (5) units per day containing approximately 100,000 bbls). The Martin Yard can hold two (2) fully assembled, loaded oil trains with additional space for other railway cars if needed. Utah Railway contracts locomotives from the Union Pacific or the Burlington Northern Santa Fe railroads to remove the oil trains from the Martin Yard.

Locomotive(s) moving loaded railway cars from the Wildcat Loadout Facility to the Martin Yard also deliver empty railway cars to the Wildcat Loadout Facility from the Martin Yard. Empty railway cars for the Wildcat Loadout Facility are stored between approximately milepost 6 and milepost 9 on the Utah Railway mainline. They are separated at any at-grade road-crossings and at other locations to allow wildlife and grazing livestock access across the tracks. At-grade road-crossings may be temporarily blocked during the movement of railway cars but typically the blockage lasts less than ten (10) minutes.

2.2.1.12. Rail Siding

CEG2 currently leases tracks from Utah Railway from milepost 0.25 (1/4 mile from the Utah/ Union Pacific Junction) to milepost 9 (Gordon Creek Bridge) on the Utah Railway mainline and the associated ancillary tracks located at the Martin Yard. Up to three additional rail tracks would be constructed west of Rail Tracks 1-4, including the Utah Railway mainline, and east of Rail Track 6, the current loading spur (see Figure 2-4). The rail tracks would be up to 2,200 feet in length and would be installed outside of the Utah Railway ROW but within the CEG2's ROW UTUT106262560.

2.2.1.13. Other Facilities and Operations

Other facilities required for loading the crude oil from the oil tanker trucks to the tank farm to the railway cars are described in the following sections.

Motor Control Center

A forty (40) foot long by eight (8) foot wide Motor Control Center and pad mounted transformer(s) would be installed on the east side of the property within the current disturbed area. The Motor Control Center would be the primary feed for all electrical equipment installed as part of this project.

Facility Lighting

All new facility lighting would be cast downward. New facility lights would be installed as follows:
Truck unloading lanes lighting would be mounted to the overhead piping structures.
Rail loading racks lighting would be mounted over each loading station and the underside of the rack structure for operators to monitor outlet valves on the underside of the railway cars.
Tank lighting would be mounted to the railing structure approximately eight (8) feet above the top of the tank over the landing platform.
Product transfer pumps lighting would be mounted to the piping structures.
Vapor combustion unit lighting would be mounted to the piping structure.

Reclamation

The ROW holder for the Wildcat Loadout Facility would be responsible for reclaiming the facility according to the Utah Division of Oil, Gas, and Mining (UDOGM) Mining and Reclamation Plan (MRP) and the BLM Green River District Reclamation Guidelines.

Reclamation would begin after operations have ceased. All equipment and facilities would be dismantled and demolished or salvaged. Salvaged equipment would be sold or removed. All concrete would be demolished and crushed into 12" minus material, rebar would be removed as much as possible and the inert material buried on-site.

On the west side of the tracks, it is impossible to restore the natural drainage pattern of the unnamed drainage because this system intercepts the Utah Railway track embankment. This embankment is managed by Utah Railway and will not be reclaimed, and the water impoundment structures adjacent to Utah Railway’s track would be left in place.

On the east side of the tracks, the area would be contoured to approximate the pre-disturbance topography. The topsoil would be spread over the recontoured area, then would then be gouged with rippers or pockmarked. The area would be seeded with the certified weed-free seed mix shown in Table 2-1, or by an adjusted mix approved by the BLM authorized officer using hand broadcast, hydroseeding, hydro mulching, or other approved methods.

Monitoring would be conducted according to the UDOGM MRP and/or according to the Green River District Reclamation Guidelines to ensure successful establishment of native plant species. A reference area has been established near the southeastern corner of the ROW and would be used for comparison of vegetation cover. CEG2 would follow UDOGM or BLM recommendations for further seeding, soil supplements, or other corrective measures during the any of the monitoring years. While UDOGM is the regulatory authority of the site, the operator

will be required to comply with Surface Mining Control and Reclamation Act (SMCRA) and the Utah Coal Regulations. As part of these regulations, the success of revegetation of the disturbed area will be judged on the effectiveness of the vegetation for the approved post mining land use (PMLU) and as dictated by R645-301-356. The approved PMLU for the Wildcat Loadout Facility is grazing and wildlife. A period of extended responsibility for successful establishment of vegetation will begin after the last year of augmented seeding. Vegetation parameters identified for the PMLU will equal or exceed the approved success standards during the growing seasons of the last two years of extended responsibility period. The extended responsibility period is 10 years and monitoring of the vegetation is required at specific schedules. The reclamation will be deemed successful by UDOGM when the approved success standards are met. Once the standards have been achieved, the operator may be released from responsibility and all surety bonds will be released.

Table 2-1: Reclamation Seed Mix

Scientific Name	Common Name	PLS/Acre
Amelanchier utahensis	Utah Serviceberry	2 to 3
Artemisia tridentata	Big Sagebrush	0.06
Krascheninnikovia lanata	Winterfat	2.00
Purshia tridentata	Bitterbrush	Up to 6.00
Achillea millefolium	Yarrow	0.05
Linum lewisii	Lewis Flax	1.00
Penstemon palmeri	Palmer Penstemon	0.50
Heliomeris multiflora	Showy Goldeneye	0.2
Bouteloua gracilis	Blue Grama	0.60
Pseudoroegneria spicata	Bluebunch Wheatgrass	2.50
Elymus trachycaulus	Slender Wheatgrass	2.50
Pleuraphis jamesii	Galleta	2.50
Hesperostipa comata	Needle and Thread Grass	3.00
Achnatherum hymenoides	Indian Ricegrass	2.0
	Total	21.21 to 27.21

2.2.2. Design Features

The following design features are included in the Proposed Action to avoid or minimize impacts.

2.2.2.1. Dust Control

During construction, dust control would be conducted, as necessary, utilizing water on the construction surfaces and/or roadways. Under normal operations, unpaved haul road areas would be treated with Magnesium Chloride to manage fugitive dust emissions. Also, vehicle speeds would be restricted to reduce fugitive dust. Finally, CEG2 would abide by all applicable requirements for emission standards listed in Utah Administrative Code R307-205.

2.2.2.2. Noise

No new noise levels are anticipated above current operating level. The largest electric motor being installed would be 150 Horsepower. The motors would be of a Totally Enclosed Fan

Cooled (TEFC) design and meet the decibel (dBA) requirements of National Electrical Manufacturers Association (NEMA) Standard Motor and Generator (MG)-1. All equipment as required meets Class I, Division 2 requirements for intrinsically safe equipment.

It is anticipated based on equipment design standards that all noise levels would be less than or equal to 85 dBA at three (3) feet. Based on 85 dBA at three (3) feet, the sound pressure would be reduced to 60.1 dBA at fifty-three (53) feet, which is at a level of normal conversation.

At the completion of construction and when operations begin, per Occupational Safety and Health Administration (OSHA) Standard 1910.95 Occupational Noise Exposure, all equipment would be tested for compliance with this standard and engineering controls would be put in place to reduce any noise levels that do not meet the standard.

2.2.2.3. Visual Resources

Down shielded or direct lighting must be used unless otherwise required for safety. Make the facilities the BLM-approved Cover Green color to match surrounding environment and minimize potential color contrast unless otherwise required for safety.

2.2.2.4. Spill Prevention, Control, and Countermeasures (SPCC)

CEG2 would be responsible for taking reasonable precautions to avoid spills. The current Spill Prevention Control and Countermeasure Plan (SPCC plan) would be followed to protect the undisturbed areas form accidental spills. The plan is available for review at the Wildcat Loadout Facility. Construction workers and employees of the operation are instructed on the information in the SPCC plan. In the event of a spill or release of petroleum, procedures outlined in the SPCC Plan would be followed. Emergency spill containment supply kits would be stored on site.

Tanks would be maintained and managed in a manner according to American Petroleum Institute (API) Recommended Practice (RP) 653 that would prevent leakage and provide applicable safety measures. If product is present in a transfer hose, the product would be captured in a metal bucket and emptied into a recycle container to cycle back into the product stream.

In the event of a spill, the incident would be reported in accordance with any federal, state, and/or local guidelines and the necessary repairs would be made as quickly as possible.

Truckers would be trained on proper loading and unloading safety procedures of the product. Railway cars would be inspected before loading operations begin and drip pans would be used during the filling operation to prevent product from reaching the ground.

2.2.2.5. Air Quality Permits

The Proposed Action would be subject to state standards for air quality, including the requirement for New Source Review in Utah R307-401 and Approval Order DAQE-AN150710004-24. This 2024 Approval Order sets the maximum throughput allowed at the facility.

2.2.2.6. Water Diversion Around Facility

Runoff from the undisturbed areas is routed around the disturbed areas via natural drainages, diversion ditches, and culverts into a series of sediment ponds to prevent runoff from flowing into the facility area. Precipitation that falls onto the disturbed areas flows into disturbed drainage diversion ditches and routes to sediment ponds. Under the Proposed Action, runoff flows will be directed to existing sediment ponds.

2.2.2.7. Stormwater Management

A Storm Water Pollution Prevention Plan (as required by the site's UPDES permit) is currently developed and is utilized for all day-to-day operations. For construction of the purposed facilities, a construction Storm Water Pollution Prevention Plan would be developed (if needed) to cover any pollution prevention strategies not covered in the existing plan.

All precipitation that falls onto the disturbed area of the Wildcat Loadout Facility would flow into diversion ditches and route to sedimentation ponds. Diversion ditches are designed to carry the capacity of a 10-year/6-hour storm event. Sedimentation ponds are designed to handle and treat the capacity of a 10-year/24-hour storm event. If a major storm fills the ponds, any necessary decant or discharge would comply with the facility's UPDES permit.

2.2.2.8. Weed Control

Periodic inspection for noxious and invasive weeds would occur. If noxious or invasive weeds are found, CEG2 would use herbicide or mechanical treatments (such as clipping seed heads or digging roots) as appropriate to remove the weeds. If herbicides are used, CEG2 would submit a Pesticide Use Proposal to the BLM for approval, any herbicides would be approved by the BLM and applied by a licensed applicator.

All construction vehicles and equipment would be power washed prior to being transported onsite to remove weed seed and propagules.

2.2.2.9. Wildlife (Migratory birds, raptors, and Greater sage-grouse)

Anti-perching devices would be installed on facilities and covering/sealing of all vertical pipes/holes of less than 12" in diameter would occur, to minimize entrapment and entanglement following best practices outlined by the U.S. Fish & Wildlife Service.

Potential nesting surfaces where bird use of structures is likely to cause take (e.g., electric poles where fire/electrocution is possible) would be monitored by CEG2 at least once every three days for any nesting activity from April 15th-August 1st. If birds have started to build any nests, the nests would be removed before they are completed, unless the nest is protected by federal, state, or local regulations.

2.2.2.10. Site Analysis

CEG2 has completed a geotechnical analysis and soils analysis.

2.3. Alternatives Considered but Eliminated from Detailed Analysis

The following alternatives were considered but dismissed from detailed analysis for the reasons described below.

2.3.1.1. Dismissed Alternative 1: CEG2 Oil Tanker Traffic in Gate Canyon

During public scoping in 2023 (see section 4.1), the public requested that CEG2's contractors not use Gate Canyon to haul crude oil from the Uinta Basin to the Wildcat Loadout Facility. Further, they were concerned that Duchesne County's pursuit of funding to pave Gate Canyon road was a connected action to the Wildcat Loadout Facility ROW amendment.

Under this alternative, oil tanker traffic would access the Wildcat Facility by driving on Wells Draw Road, Gate Canyon Road, Nine Mile Canyon Scenic Backway, and Highway 6 from its intersection with Nine Mile Canyon Scenic Backway to Consumers Road. This alternative was dismissed from detailed analysis for the following reasons.

First, the BLM determined that restricting use of an existing road is outside the BLM's jurisdiction because transportation by tanker truck is regulated by Department of Transportation (oil tanker trucks) and the Pipeline and Hazardous Materials Safety Administration (hazardous materials). (see Table 1-4).

Second, CEG2 has been working with the Utah Legislature and Department of Transportation to prepare Highways 191 and State Road 6 for the current and foreseeable amount of oil tanker truck traffic[6]. Funding for upgrades to Gate Canyon Road has not been requested by CEG2. Additionally, CEG2's representatives have stated that they do not intend to pursue improvements to Gate Canyon Road.

Third, Gate Canyon in not a connected action because Duchesne County has been independently and intermittently pursuing pavement of Gate Canyon Road since 2011, seven years before CEG2 acquired the Wildcat Facility ROW and fourteen years before BLM received CEG2's current proposed ROW amendment. BLM received an updated application from Duchesne County in February 2022. Duchesne County's stated purpose in their application is to improve recreational access between Duchesne and Carbon counties. Duchesne County's application is not approved and environmental compliance with the NEPA, National Historic Preservation Act (NHPA), Endangered Species Act (ESA) and other applicable laws is likewise not completed. Also, in January 2023, Duchesne County requested funding from the State Legislature for realignment and paving Gate Canyon Road, but the request has since been dropped from Legislative consideration.

2.3.1.2. Dismissed Alternative 2: Transportation Alternatives

During public scoping in 2023 (see section 4.1), the public requested that the oil not be transported along the railway through Eagle County, Colorado. Under this alternative, the oil would be transported along the rail lines shown in Figure 1-3 other than the line that would go

[6] *See https://storymaps.arcgis.com/stories/553c1dcf5bb24a4eb043b8913b125a12*

through Eagle County, Colorado. This alternative was dismissed from detailed analysis for the following reasons.

First, a decision to allow the expansion of the Wildcat Loadout Facility on the part of the BLM would not approve any particular transportation route, so transportation routes (other than Consumers Road and the railway between Wildcat Loadout Facility and the Martin Yard) are out of the scope of the EA as described in section 1.2 and 3.2. See also 3.3 bullets 4 and 5.

Second, train transportation and hazardous materials transportation are regulated by other agencies as described in Section 1.5, so it is outside the jurisdiction of the BLM.

Third, decisions regarding the transportation of crude oil from the lease holdings to market are dictated by market conditions, origination and destination points, and the intended use of the crude oil at the time of production and sale. These are all out of the scope of the EA as described in section 1.2 and 3.2.

CHAPTER 3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

3.1. General Setting

Construction of the Wildcat Loadout Facility was completed in 1985. The coal loading facility on the west side of the ROW has been inactive since 2016, but the equipment is still in place. In 2014, permanent facilities were added to the ROW to allow for oil transloading. Of the 270-acre ROW, approximately 75 acres are previously disturbed by these previous and current operations. The ROW is located just off the main paved Consumers Road, which is a 3.5-mile-long public road maintained by Carbon County. This road was previously used by the coal mine operator for mine access and coal transportation. It is currently used by trucks hauling crude oil, recreationists accessing public lands, and livestock grazing permittees. The ROW is within the Consumers Wash Allotment and is fenced to exclude livestock.

The Wildcat Loadout 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 ROW was sagebrush grassland before the Wildcat Loadout Facility was constructed. Noxious weeds and invasive weeds found in the ROW and in the area include, but are not limited to tamarisk, musk thistle, cheatgrass and Russian thistle. Animal species found in the area are mostly elk, mule deer and raptors. Since the Wildcat Loadout Facility is already disturbed, it does not contain habitat suitable for any species. The existing heavy truck traffic and train activity also make this an undesired area for most wildlife species. The nearest waters sources are more than 2.5 linear miles to the east of the ROW.

3.2. Scope of Analysis

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) and environmental effects for each issue identified for detailed analysis.

The analysis focuses on the reasonably foreseeable effects of the alternatives that are useful to the decision-making process or that contain information on which the agency can act. Therefore, the analysis focuses on the effects from the redesign, installation, and operation of the Wildcat Facility, the truck traffic on Consumers Road, and the train traffic between the Wildcat Loadout Facility and the Martin Yard.

The analysis does not include upstream effects from the Uinta Basin oil production and oil tanker truck transportation of crude oil from the oil field to the Consumers Road turnoff, or downstream effects from railway car transportation of crude oil from the Martin Yard to the refineries and refining and downstream use of crude oil. The scope and occurrence of those actions do not depend on whether the BLM approves the Wildcat Loadout Facility expansion because the level of upstream crude oil production in the Uinta Basin, the level of train traffic downrail of the Martin Yard, and the level of downstream refining are instead driven by independent market conditions (such as the price of oil) and technological advancements, not the operation of the Wildcat Loadout Facility, BLM does not consider them reasonably foreseeable effects of the BLM’s decision.

Specifically, with respect to upstream production, as documented in Appendix B, as of February 2025, Utah's crude oil production is 182,000 bbls per day. By comparison, Salt Lake City refinery capacity is 80,000 bbls per day, and Carbon County's *existing* transloading capacity is 180,000 bbls per day. Therefore, crude oil export capacity currently exceeds crude oil production for the entire state of Utah. Even if BLM does not approve the Proposed Action, existing export capacity could support increased crude oil production in the Uinta Basin. In other words, a BLM decision to authorize the Wildcat Loadout Facility expansion will not necessarily increase crude oil production in the Uinta Basin (which hinges on overall market forces). Instead, so long as the price of crude oil remains low, production in the Uinta Basin will likely remain static, and expansion of the Wildcat Loadout Facility will likely shift where transloading occurs, by providing a more convenient location to transfer crude oil from trucks to rail cars. In such a scenario, the amount of oil produced in the Uinta Basin does not depend on whether the BLM authorizes the expansion of the Wildcat Loadout Facility.

The situation is similar with respect to train traffic downrail of the Martin Yard and downstream refining. While expansion of the Wildcat Loadout Facility may change how crude oil arrives at the Martin Yard, the ultimate amount of crude oil that leaves the Martin Yard on train cars and is ultimately refined does not hinge on expansion of the facility. That, ultimately, depends on market forces which, in turn, impact crude oil production in the Uinta Basin, both of which are unrelated to the Proposed Action. Moreover, future downstream actions that BLM does not control are beyond the scope of this analysis.

Accordingly, the analysis in this EA is limited to analyzing the effects of those activities that hinge on whether BLM authorizes the Proposed Action and more crude oil is transloaded at the Wildcat Loadout Facility—namely, increased truck traffic on Consumers Road, activities at the expanded Wildcat Loadout Facility, and increased railway traffic between the Wildcat Loadout Facility and the Martin Yard—and does not analyze the effects of those activities, addressed earlier in this section, that do not hinge on BLM's decision.

3.2.1. Analysis Assumptions

The following assumptions influence the scope of analysis and environmental effects.

1. CEG2 indicated that their proposed ROW amendment would accommodate a target throughput of 100,000 bbls per day. Portions of the project are overdesigned to prevent tanker trucks parking on Consumers Road due to backlogs at the offloading facilities. Therefore, the air quality analysis assumes the proposed facilities would accommodate a throughput of approximately 100,000 bbls per day.
2. Under the No Action Alternative, CEG2 would build and use the TLA Lease Transloading Facility to transload oil from the Uinta Basin oil fields to the Gulf Coast refineries and would also continue transloading at the Wildcat facility using current transloading facilities. The same length of Consumer's Road would be used, but tanker truck traffic would continue on approximately one mile of existing dirt road (see Figure 2-1, the west half of the dirt road loop just north of the Wildcat Loadout Facility) to access the facilities at the TLA lease.
3. If BLM approves the Wildcat modifications, CEG2 will build and use their TLA property to accommodate additional train storage and rail siding, but they would not install the Proposed Action's transloading facilities on it.

4. The Wildcat Loadout Facility would not increase total crude oil hauling traffic in Uintah and Duchesne Counties because oil production is occurring regardless of this transloading expansion and will be taken to a refinery outside of these counties either by truck or transloading onto a train through a different loadout facility, regardless of the alternative selected (see section 3.2).
5. The Proposed Action would re-allocate oil tanker truck traffic to the Wildcat Loadout Facility from other transloading facilities within Carbon County which are located more than 16 miles away in the Wellington, Utah area or the Salt Lake City refineries.

3.3. Reasonably Foreseeable Future Actions (RFFA) Common to all Issues

The following past, present, and reasonably foreseeable actions were considered during preparation of the cumulative impacts analysis.

- ConocoPhilips Company/Scout Energy Group/XTO Energy UTUT105525661 (legacy number UTU 079159) Oil and Gas Lease
- CEG2's existing ROW UTUT106262560 known as the Wildcat Loadout Facility as described in the no action alternative and overlapping CEG2's existing ROW UTUT106235040 for additional facilities.
- Utah Railway's ROW UTUT106155575, railway and sidings that connect the Wildcat Loadout Facility with the Martin Yard in Helper, Utah.
- PacifiCorp doing business as Utah Power and Light UTUT106092525 (legacy number UTU-94607) 48-kV powerline, and UTUT106103913 (Legacy Number UTU-53815) switch rack.
- Emery Telcom UTUT105987487 (legal number UTU-32293) buried communication line.
- Carbon County UTUT106099056 (Legacy Number UTU-54688) Consumer Road.
- Carbon County UTUT106107053 (Legacy Number UTU-52810) Access Road
- Carbon County UTUT105884090 (Legacy Number UTU-87938) Geezer Backbone Trail
- CEG2's existing ROW UTUT106262560 for coal loading and crushing activities up to 5.5. million tons per year.
- Natural Resources Conservation Service's Upper Price River Watershed Plan and Environmental Impact Statement, one alternative of which affects the alignment of Consumers Road.
- Livestock Grazing in the Consumers Wash allotment within the analysis area.

3.3.1. Leased TLA Land Development

Under the No Action Alternative, CEG2 would create loadout facilities onto 51.61 acres of adjacent leased TLA lands to add 80,000 bbls/day transloading capacity to their current Wildcat Loadout Facility operation. The development that would occur on the TLA parcel would require the same facilities (tanks, truck unloading racks, tanks, vapor combustion unit, rail loading facilities, motor control center, etc.) described under Alternative B: Proposed Action.
Under the Proposed Action Alternative, CEG2 would use their TLA lease for rail storage and rail siding to assemble trains.

3.4. Issue 1: What impacts would occur because of the increase in Consumers Road truck traffic?

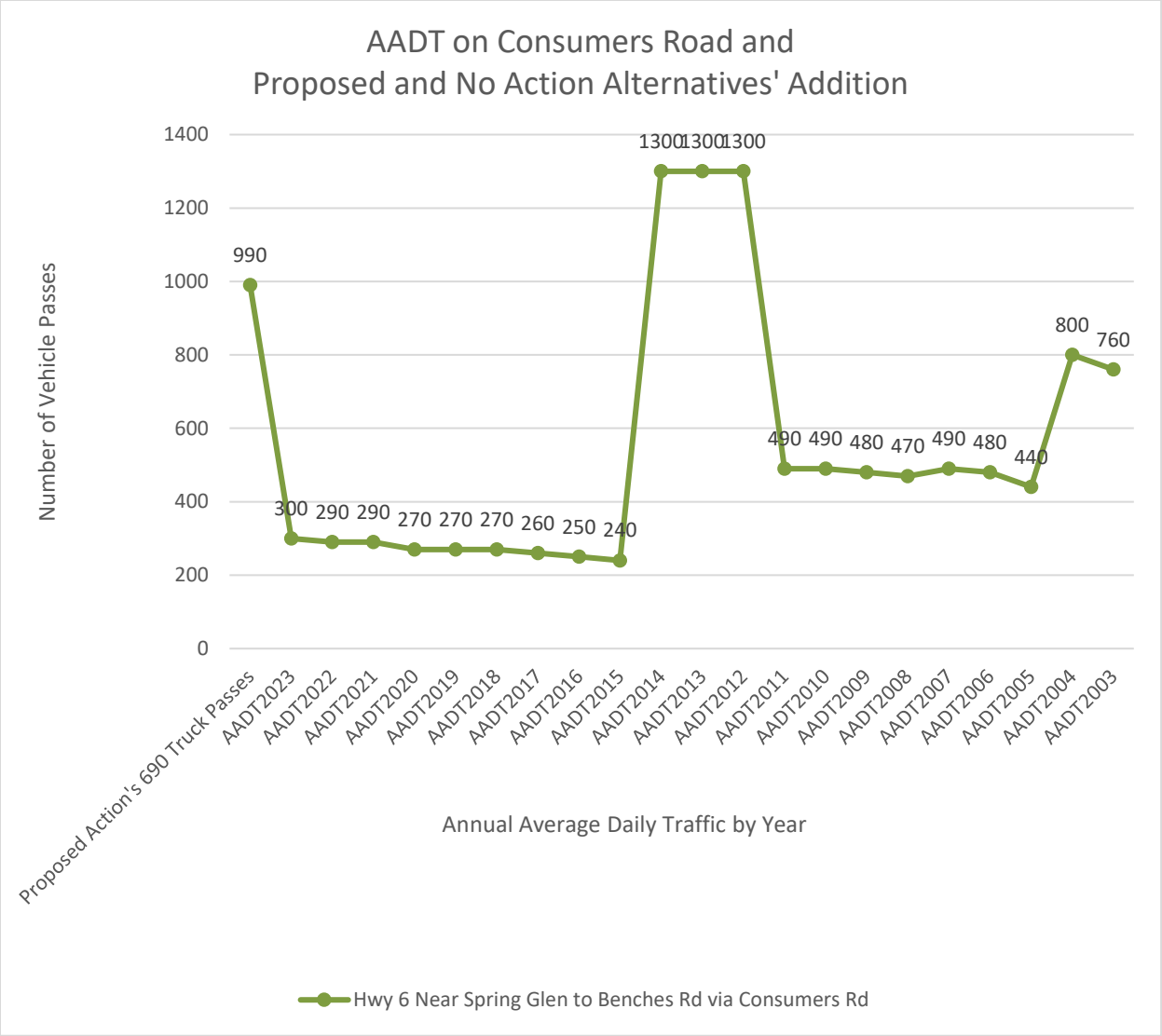
3.4.1. Affected Environment

The Wildcat Loadout Facility has been used as a coal loadout for the railway since the 1920s. It is accessed by 3.5 miles of a paved[7], two-lane, county-maintained road called Consumers Road (see Figure 2-1). Approximately 2 miles are within Greater sage-grouse General Habitat Management Area. The topography the road traverses is barren with little to no vegetation and no suitable sensitive habitats. The road turns to dirt just beyond the Wildcat Loadout Facility and is used to access private lands as well as other public lands and their associated opportunities. These include other ROWs, Gordon Creek Off Highway Vehicle trail, coal bed methane fields, and livestock grazing permits and facilities. The analysis does not address roadways beyond Consumers Road because oil production, and its transportation on other roads and rails, is occurring regardless of this transloading expansion and will continue to occur regardless of the alternatives in this EA (see sections 3.1 through 3.3).

On Consumers Road, UDOT began tracking the Average Annual Daily Traffic (AADT) in 2003 (UDOT 2025). AADT is a unit of measurement that represents the average number of vehicle trips on a segment of road or highway. It represents traffic for both directions of travel. Figure 3-1 depicts data from UDOT regarding the AADT on Consumers Road from 2003 through 2023. As shown in Figure 3-1 (note that oldest data on the right and the most recent data is on the left, so the graph must be read from right to left to see the change over time):
From 2003 through 2010, the AADT ranged from 440 to 800 vehicles on the road.
From 2012 through 2014, the AADT was 1,300 vehicles due to coal transloading activity.
From 2015 through 2023 (the latest available AADT available for Consumers Road), AADT ranged from 240 to 300 vehicles.

[7] *About ¼ mile past the Wildcat Facility, Consumer's Road becomes a crowned and graveled road that provides access to public lands.*

Figure 3-1: AADT on Consumers Road from 2023 through 2003 including the Proposed Action's Additions.



3.4.2. Environmental Effects

3.4.2.1. Alternative A (No Action)

Currently, there is an average of 77 oil tanker truck deliveries per day to the Wildcat Loadout Facility. This activity would continue under the No Action alternative. To account for trucks traveling roundtrip (into the facility and out from the facility) for delivery of product, this would result in a total of 154 truck passes on Consumers Road. Truck passes associated with oil transloading at the Wildcat Loadout Facility began in 2013 and are therefore included in UDOT's 2013 to 2023 AADT.

If BLM were to select the no action alternative, CEG2 has indicated that they would construct facilities on their existing TLA lease to meet their total target throughput of 100,000 bbls per day. In that scenario, the same amount of oil tanker truck traffic predicted under the Proposed Action would occur on Consumers Road. However, an additional mile of existing dirt road west

of the train tracks would be traversed by the trucks to reach the TLA leased facilities. See Figure 2-1, the west half of the dirt road loop directly north of the Wildcat Loadout Facility pin.

3.4.2.2. Alternative B (Proposed Action)

The Proposed Action would add an average of 345 additional oil tanker truck deliveries per day to the Wildcat Loadout Facility (690 truck passes on Consumers Road, which accounts for the round-trip activity). To provide an estimate of the impacts, Figure 3-1 added those 690 truck passes to the AADT 2020 data. Ignoring other vehicle trends, for which the BLM and UDOT has no data, the Proposed Action alternative would put Consumers Road AADT at 990 AADT (690 truck passes 300 AADT; note the AADT includes all traffic on the road (e.g., recreational, grazing permittees, private landowners, oil tanker trucks, etc.)) which is lower than the AADT on that road in 2012 through 2014. CEG2 has proposed a maximum unloading of 100,000 bbls per day to eliminate the risk of traffic backup onto Consumers Road.

The BLM does not have data for accidents on Consumers Road. Nationally, the average vehicle crash rate is approximately 203 crashes per 100 million vehicle miles20 (NHTSA 2021). In the analysis area, the crash rate is lower than this estimate (the data provides only crash numbers, neither source explains why the crash rate in Carbon County is lower than the national average). In 2021, Carbon County had 88 crashes per 100 million vehicle miles, and Duchesne County had 105 crashes per 100 million vehicle miles (UDOT 2023). The Carbon County crash rate presumably includes crashes on Consumers Road. It would take 113 years for the Proposed Action to reach 100 million vehicle miles (and 105 crashes), thus the Proposed Action's effect on traffic may result in less than 1 crash per year[8].

Accidental spills of petrochemicals during a crash could degrade surface water quality should it occur in the wash when the wash is moving water, which could adversely affect aquatic habitat. As disclosed in AIB-21, the nearest water is Price River, which is 0.1 mile east of the Consumers Road intersection with Highway 6 and 2.5 miles from the Wildcat Loadout Facility. Uinta Basin black and yellow crude oils are waxy crude oils that do not flow except at high temperatures and if spilled onto land, tend to not disperse, and if spilled in water, tends to form globules of semisolid material that can be cleaned up by hand (if in water) or by shovel (if on land) (STB 2021). The Stormwater Pollution Protection Plan (SWPPP) contains site-specific measures to avoid and minimize petrochemical spills that could cause water quality impacts.

If the force of an accident were sufficient to ignite the crude oil, a fire could result that could cause the truck's tank to rupture. The BLM is not aware of this happening historically on Consumers Road. Given the paved roadway, and the badlands nature of the lands around the existing road, the risk of damage to other vegetation and habitats from a fire would be low.

The BLM does not have data for animal strikes for Consumers Road. However, Pagany 2020 synthesizes the findings of various wildlife-vehicle collusion studies regarding vehicles and animal strikes. It shows that number of animal strikes may be positively or unclearly correlated

[8] *3.5 miles x 2 trips (in and out)) =7 miles. 7 miles x 345 vehicles per day = 2,415 vehicle-miles per day. 2,415 vehicle-miles per day x 365 days per year = 881,475 vehicle miles per year. 100 million vehicle miles / 881475 vehicle miles per year = 113 years*

to either traffic volume or speed depending on species. The speed of Consumers Road is 35 miles per hour. However, the speed limit is outside the BLM's control, but the BLM assumes it will remain at 35 miles per hour. Therefore, there may be an increase in the number of animal strikes associated with the increased volume of oil tanker truck traffic. The BLM also anticipates a proportional change in noise and light effects from the additional tanker truck traffic to nearby wildlife, which may include displacement and disturbance.

Regarding traffic volumes and its relationship to road maintenance frequency, the BLM found two studies for nearby Highway 191, UDOT 2024 and Feula 2022, which may inform the maintenance needs from oil tanker truck traffic for Consumers Road. First, the United States Road Assessment Program identified portions of Highway 191 as having potential hazards related to road surface integrity, shoulders, passing lanes, and guardrails (UDOT 2024). Second, the U.S. 191 Traffic Volume and Level of Service Projections study prepared for UDOT (Feula 2022) projected Highway 191's total average daily traffic in 2030. The study estimated a baseline in 2022 of 1,400 total average daily traffic. The study estimated a 2030 projected total average daily traffic of 3,100. To determine Highway 191's level of service in 2030, the study then used daily passenger car equivalents to convert the 2030 daily traffic projection into terms of passenger cars. It projected the 2030 passenger car equivalent to be 10,550 total average daily traffic. The level of service calculations helped UDOT identify which portions of Highway 191 need improvements to maintain vehicle safety and road integrity. Regarding differences between the two roads which limits the applicability of the Highway 191 data to Consumers Road, it is important to note that Highway 191 has a baseline average daily traffic volume (1,400 in 2020) similar to Consumers Road's historic high AADT (1,300 AADT in 2012-2014). Highway 191 is longer (44 miles) compared to Consumers Road (3.5 miles). Highway 191 also traverses mountain topography compared to Consumers Road's foothills topography. Therefore, the BLM assumes there may be a positive relationship between the volume of traffic from the Proposed Action and the maintenance frequency of the road though it is estimated to be lower than that projected for Highway 191 due to the lower traffic volumes.

If the BLM approves the Proposed Action, CEG2 has indicated that they would construct additional railway sidings for assembling trains and empty railway car storage on the leased TLA lands near the Wildcat Loadout Facility.

3.4.2.3. Past, Present, and Reasonably Foreseeable Effects

The BLM and UDOT do not have data regarding vehicle trends on Consumers Road, but the BLM presumes that vehicles accessing these other opportunities will remain stable or increase in the future. According to CEG2, the ten unloading lanes allows twenty (20) trucks per hour to be processed through the facility leading to a total possible throughput of up to approximately 480 trucks per day (960 passes per day) equaling a maximum unloading capacity of 150,000 bbl per day. If Utah Department of Air Quality were to issue an updated air permit allowing emissions on throughput of 150,000 bbl per day, the BLM presumes that oil tanker trucks accessing the Wildcat Loadout Facility may at times queue on Consumers Road. Under this scenario, the BLM presumes CEG2 would either work with the County to amend the Consumers Road ROW to create a turning lane or amend the Wildcat ROW to create a parking area. Neither action has been requested at this time and neither is foreseeable at a maximum throughput of 100,000 bbl per day under CEG2's current State-issued air permit.

3.5. Issue 2: What impacts would occur because of the increase in rail traffic between Wildcat Loadout Facility and Martin Yard?

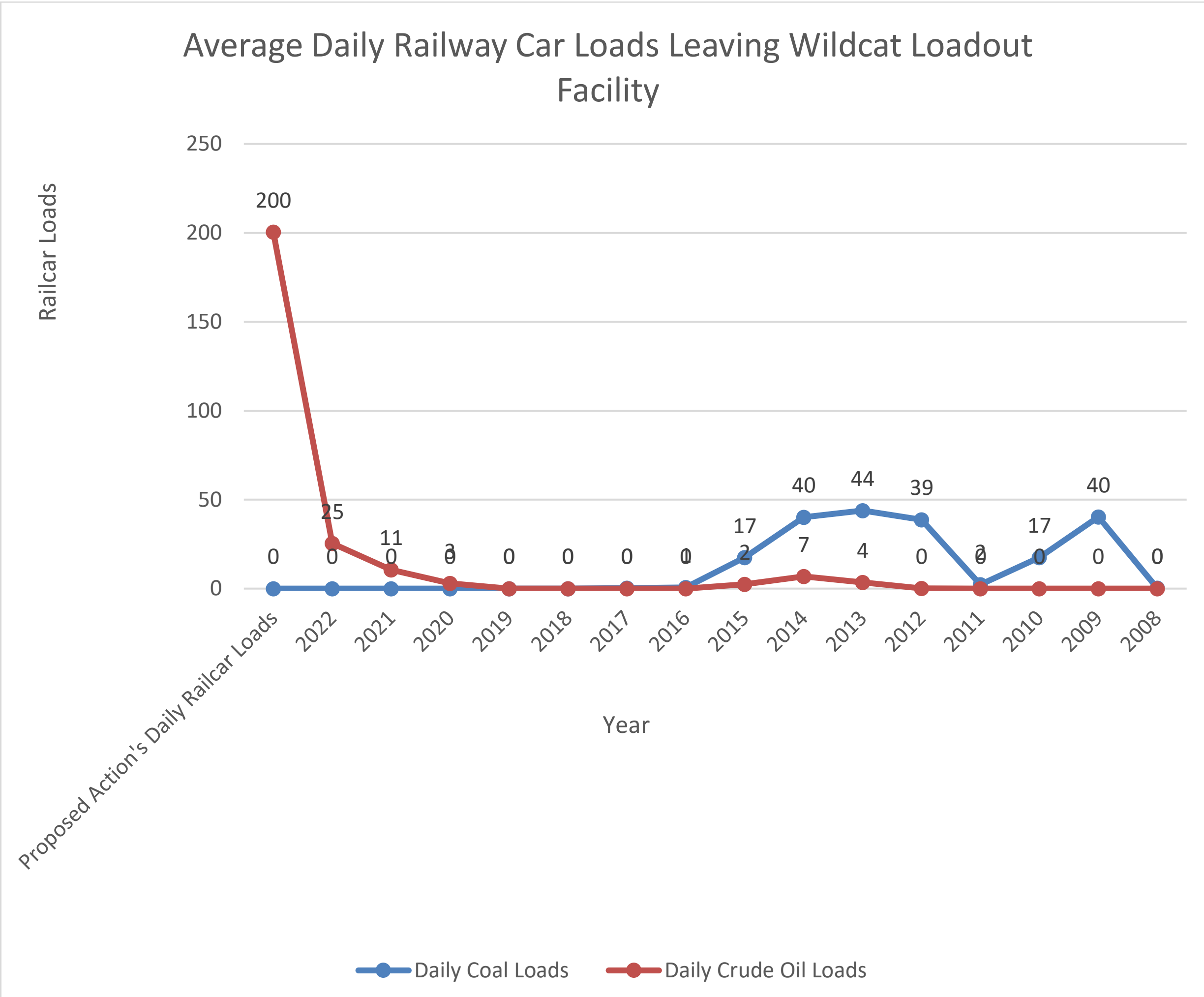
3.5.1. Affected Environment

The Wildcat Loadout Facility has been used as a coal loadout for the railway since the 1920s. It is near and overlaps Utah Railway's ROW UTU10655575 which includes railway and sidings for the Wildcat Loadout Facility and connecting the facility to the Martin Yard (see Figure 2-1). There are approximately five miles of track between the Wildcat Loadout facility and the Martin Yard. Approximately 1 mile is within Greater sage-grouse General Habitat Management Area. The track goes through foothill type elevation and directional changes which, combined with short distance, necessitate a slow train speed. The topography the track traverses is barren with little to no vegetation and no sensitive habitats. Only the Wildcat Loadout Facility uses this segment of track. The analysis does not address railways beyond the Martin Yard because oil production, and its transportation on other roads and rails beyond this point, is occurring regardless of this transloading expansion at Wildcat and will continue to occur regardless of the alternatives in this EA (see section 3.1). During the time that the track between the Wildcat Loadout facility and the Martin Yard has been used for loadout purposes, the BLM has not heard of any accidents or derailments.

Figure 3-2 depicts data provided by Union Pacific to CEG2 regarding the average daily railway car loads (both coal and oil) leaving the Wildcat Loadout Facility from 2022 through 2008. As shown in Figure 3-2 (note that oldest data on the right and the most recent data is on the left, so the graph must be read from right to left to see the change over time):

- From 2009 through 2016, the average daily railway car loads ranged from 3 to 48, mainly due to coal transloading activity. Note that Utah Rail's data shows that oil transloading occurred in 2013 and 2014 though the BLM did not approve the ROW modification for permanent transloading equipment until September 2014. This prior transloading was done through mobile equipment that did not require a ROW modification or BLM approval because it was casual use under 43 CFR 2801.5 (b) (see BLM 2014 section 4.4.6.2 which states that 6,000 bbls per day were already being transloaded).
- From 2020 through 2022, the daily railway car loads ranged from 3 to 25, mainly due to oil transloading activity.
- In 2008, and 2017 through 2019, the daily railway car loads were so low as to not register a daily average. The year 2008 had a total of 85 railway car loads shipped the entire year, 2017 had 94, and 2018 and 2019 had zero.

Figure 3-2: Average Daily Railcar Loads Leaving Wildcat Loadout Facility from 2022 through 2003 including the Proposed Action's Additions.



3.5.2. Environmental Effects

3.5.2.1. Alternative A (No Action)

Currently, up to 35 railway car loads leave the Wildcat Loadout Facility daily. This activity would continue under the No Action alternative. Doubling that number to account for empty railway cars coming in, a total of 70 daily railway cars pass between Martin Yard and Wildcat Loadout Facility. Railway car passes associated with oil transloading at the Wildcat Loadout Facility began in 2013 and are therefore included in Utah Rail's 2013 to 2022 data.

If BLM were to select the no action alternative, CEG2 has indicated that they would construct facilities on their existing TLA lease to meet their total target throughput of 100,000 bbls per day. In that scenario, the same amount of railway car truck traffic predicted under the Proposed

Action would occur on the Utah Rail's ROW between the Wildcat Loadout Facility and Martin Yard.

3.5.2.2. Alternative B (Proposed Action)

The Proposed Action would add up to 175 additional oil tanker truck deliveries per day to the Wildcat Loadout Facility. To provide an estimate of the impacts of those oil tanker truck deliveries on rail traffic between the loadout facility and Martin Yard, Figure 3-1 added those 175 truck passes to the Utah Rail 2022 data. Based on that data, the Proposed Action would result in an average of 200 daily railway car loads, which is three times more railway car loads than currently occurs. When accounting for empty railway cars delivery, the proposed action would result in 400 daily railway car passes.

In 2019, there were 1,869 train accidents in the U.S. across all track types and across all railroads; 607 of these were on main lines or sidings (Federal Railroad Administration (FRA) 2020). To estimate railway accidents, the BLM extrapolated data from the Uinta Basin Railway (Surface Transportation Board (STB) 2021). The Uinta Basin Railway anticipated between 4 trains and 11 trains per day (STB 2021). STB 2021 predicted that rail accidents would occur approximately once every 3 to 10 years and that a spill could occur once every 14 to 40 years with the chance of the spill occurring in a sensitive area such as a waterway being smaller because of the small amount of the railway falling within sensitive areas. The Wildcat Loadout Facilities would move three 35-car units per day to the Martin Yard. Given the slow speed due to the elevation change and short mileage, the lack of sensitive habitats other than one ephemeral wash and given there are no other trains on the track, the BLM believes the accident and spill rates between the Wildcat Loadout Facility and the Martin Yard will be negligible.

Accidental spills of petrochemicals could degrade surface water quality should they occur in the wash when the wash is moving water, which could adversely affect aquatic habitat. As disclosed in AIB-21, the nearest water is 2.5 miles east of the existing railway. Uinta Basin black and yellow crude oils are waxy crude oils that do not flow except at high temperatures and if spilled onto land, tend to not disperse, and if spilled in water, tend to form globules of semisolid material that can be cleaned up by hand (if in water) or by shovel (if on land) (STB 2021). The SWPPP contains site-specific measures to avoid and minimize petrochemical spills that could cause water quality impacts.

If the force of an accident were sufficient to ignite the crude oil, a fire could result that could remain confined to a single car or could surround other cars and cause them to rupture if the thermal protection on the other cars were breached or damaged. A fire that surrounds other cars could, in turn, cause a larger fire. Similarly, if the train were to result in a sparking[9] the cheatgrass along the route might catch fire. The BLM is not aware of this happening historically on the rail between the Wildcat Loadout Facility and the Martin Yard. Given the gravel base under the railway, and the badlands nature of the lands around the existing railway, the risk of damage to other vegetation and habitats from a fire would be low.

[9] *https://www.tsb.gc.ca/eng/medias-media/fiches-facts/r21v0143/r21v0143-20210715.html*

The BLM does not have data for animal strikes for the rails between the Wildcat Loadout Facility and the Martin Yard. However, the BLM assumes the effects are similar to vehicle strikes as synthesized in Pagany 2020 which shows that number of animal strikes may be positively or unclearly correlated to either traffic volume or speed depending on species. In STB 2021, the maximum speed for a loaded train was estimated to be 10 to 20 miles per hour, which would likely be slow enough for large and medium sized animals, including eagles, to see and hear the train in advance of a potential strike, allowing animals to flee the area. Given the short distance of the Wildcat Loadout Facility to Martin Yard track, and the weight of a fully loaded unit, the speed between the Wildcat Loadout Facility and the Martin Yard is likely to be lower than 20 miles per hour. Given the increased number of 35-car units moved on the track (three per day instead of one per day), there may be an increased potential for animal strikes, but the potential is still expected to be low due to the slow speed of the train.

The BLM also anticipates a change in noise and light effects to nearby wildlife proportional to the additional 35-car units and that, similar to traffic, different species will respond differently, and responses are expected to range from disturbance to habituation. In STB 2021, the noise disturbance study area was defined by the 100 A-weighted decibel (dBA) sound exposure level (SEL), the noise level at which studies have shown animals (domestic and wild) exhibit a response to train noise (FRA 2005). Based on noise modeling for the [Uinta Basin Railway], the 100-dBA SEL is estimated to extend 350 feet from the rail line for wayside (locomotive engine and wheel on rail) noise and 460 feet for horn noise at grade crossings. The increased noise would only occur until the train passes. STB 2021 predicted that noise-related effects on wildlife would mostly occur within approximately 350 feet of the [Uinta Basin Railway]. This is the distance at which wayside noise levels would be at or above 100 dBA SEL, the noise level at which studies have shown animals (domestic and wild) exhibit a response to train noise (FRA 2005). For horn noise at grade crossings, noise-related effects could occur out to approximately 460 feet from the locomotive. Noise levels beyond this distance are not expected to adversely affect wildlife (FRA 2005). The BLM anticipates similar effects from the increased railway car traffic between the Wildcat Loadout Facility and the Martin Yard.

If the BLM approves the Proposed Action, CEG2 has indicated that they would construct additional railway sidings for assembling trains and empty railway car storage on the leased TLA lands near the Wildcat Loadout Facility.

3.5.2.3. Past, Present, and Reasonably Foreseeable Effects

The railway sidings in the Wildcat Loadout Facility ROW are used exclusively for that facility as is the track between the Wildcat Loadout Facility and the Martin Yard. The BLM was unable to obtain railway shipping numbers for the Union Pacific railway transportation routes outside of the Wildcat Loadout Facility because the BLM was told this data is protected for national security reasons. However, the BLM presumes the number of trains using that railway will remain stable or increase in the future.

CHAPTER 4. PUBLIC INVOLVEMENT, CONSULTATION AND COORDINATION

4.1. Public Involvement

On June 5, 2023, the BLM posted to ePlanning a website dedicated to the Wildcat ROW modification request. Several members of the public submitted letters of interest in the project with scoping-level comments including possible alternatives for consideration and concerns to be considered. The alternatives eliminated from detailed analysis described in section 2.4 of this EA address those proposed alternatives. The concerns identified and considered by the BLM include:
The project's relationship to the paving of Gate Canyon and traffic in Nine Mile Canyon,
The project's relationship to oil production in the Uinta Basin with the attendant air and water impacts,
Oil trains moving through Colorado with their potential for accidents, oil spills, and wildfires in or adjacent to the Colorado River headwaters and any resulting endangered fish impacts,
The combustion of oil with the attendant air and climate impacts, and
The impacts of the trucks on the roads.
The BLM also received multiple requests for a public comment period.

On April 23, 2025, CEQ authorized the use of alternative arrangements to comply with the NEPA before taking urgently needed actions (43 CFR 46.150) for projects that respond to the national energy emergency (EO 14156).

On May 1, 2025, CEG2 requested that BLM process its Wildcat Loadout Facility ROW amendment under alternative arrangements for NEPA compliance.[10] On June 19, 2025, the request was approved by the Acting Assistant Secretary – Land and Minerals Management Under the Alternative Arrangements for NEPA Compliance, the Responsible Official is not required to seek public comment prior to finalizing the EA. The BLM published the project on ePlanning on June 18, 2025.

4.2. Consultation and Coordination

Tribal consultation letters were mailed and emailed on May 8, 2025. The Paiute Tribe of Utah responded on June 16, 2025, requesting to participate in the NEPA process. This consultation is ongoing as of June 17, 2025.

One previously recorded site as eligible for the National Register of Historic Places (NHPA) was revisited and no contributed features were observed. One isolated find was documented and determined not eligible for the NRHP. The BLM has made an undertaking determination of no historic properties affected directly and indirectly (physically, visually, auditorily and

[10] *The President issued Executive Order (EO) 14156 "Declaring a National Energy Emergency" on January 20, 2025, which directed heads of executive departments and agencies to "facilitate the … transportation, refining, and generation of" energy resources on Federal lands. Secretary's Orders No. 3417 and 3418 implemented provisions of EO 14156 and directed Bureaus and Offices under the Department of the Interior to identify any emergency authorities to facilitate "energy projects" as defined by EO 14156. On April 23, 2025, the Council on Environmental Quality (CEQ) authorized the use of alternative arrangements to comply with the National Environmental Policy Act (NEPA) before taking urgently needed actions (43 Code of Federal Regulations (CFR) 46.150) for projects that respond to the national energy emergency.*

atmospherically). As the site has no contributing features and isolated finds are not eligible for the NRHP, there would be no significant impact to cultural resources from this Proposed Action. Due to the project size and finding of effect, the report was sent to SHPO under the Small-Scale Programmatic Agreement and received April 12th, 2024 (Case No. 24-0813).

Section 7 Consultation conducted under the Endangered Species Act was not necessary because there are no listed species or habitat present. See Table 1-5, and Appendix AIB-24 and AIB-26.

CHAPTER 5. LIST OF PREPARERS

Table 5-1: List of Preparers.

Name	Title	Area of Responsibility
Kyle Beagley	Assistant Field Manager – Lands and Minerals	Lands and Realty
Tyler Elgiar	Natural Resource Specialist (Air)	Air Quality
Molly Hocanson	NEPA Specialist	Quality Assurance
Stephanie Howard	Branch Chief: NEPA & GIS	Quality Assurance, Traffic, Trains
Dan Rainey	Realty Specialist	Realty Process

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GLOSSARY OF TERMS

Ancillary Track: Additional rail tracks besides the Utah Railway mainline located in the Martin Yard.

Annual average daily traffic: Average number of vehicles passing a point on a road in a day.
At-grade road-crossing: The intersection between a road and a railroad that occurs at the level of the tracks.

Badlands: Extensive tracts of heavily eroded, uncultivable land with little vegetation.

Burlington Northern Santa Fe Railway: One of Coal Energy Group 2's railway partners.

Coal Energy Group 2: The holder of the Wildcat Loadout Facility Right-of-Way.

Coal loadout facility: A facility where coal is stored and loaded onto railway cars.

Common header: A section of pipe that has multiple connections connected to it to direct the flow to a single source/outlet.

Consumers Road: Milepost 21 (Consumers Road's intersection with Highway 6) to Milepost 12 (Consumers Road's intersection with the Wildcat Facility).

Crude oil operation: Transfer of crude oil from truck to railway cars either directly from truck to railway car (called transloading) or indirectly using truck unloading racks, storage tanks, and railway car loading racks.

Detonation arrestors: An element within vapor piping that, in the event of a detonation in the pipe, would collapse to close off the pipe and stop the detonation.

Down Shielded Lighting: Lights with shields that direct the light downward.

Drip legs: A section of horizontal pipe within an otherwise vertical piping that collects condensed materials for recycling back into the product stream.

Gate Canyon: An unpaved segment of Wells Draw Road that connects Highway 40 to Nine Mile Canyon Road.

Gulf Coast refineries: The Texas and Louisiana refineries with contracts to process the crude oil being transloaded by the Wildcat Loadout Facility.

Highway 6: Milepost 233 (Highway 6's intersection with Highway 191 in Indian Canyon) to Milepost 230 (Highway 6's intersection with Consumers Road).

Highway 191: Milepost 296 (Highway 191's intersection with Highway 40 in Duchesne) to Milepost 251 (Highway 191's intersection with Highway 6 north of Helper, UT). Also called Indian Canyon.

Highway 40: Milepost 86 (Highway 40's intersection with Highway 191 in Duchesne) to milepost 130 (Highway 40's intersection with Highway 88 to Ouray).

Leased TLA Lands: 51.61 acres of lands administered by Utah's Trust Lands Administration adjacent to the existing Wildcat Loadout Facility.

Level of Service: A mechanism used to determine how well a roadway is operating from a traveler's perspective. Typically, six levels of service are defined, and each is assigned a letter designation from A to F, with LOS A representing the best operating conditions, and LOS F the worst.

Loading racks (also railway car loading racks): Equipment capable of loading crude oil into railway cars from onsite storage tanks.

Landing platform: A platform on top of the tank that has appropriate handrails and other guards to allow an operator to safely access any equipment at the top of the tank.

Loadout Truck Bays: The area a truck will enter to use the unloading racks.

Martin Yard: A railroad yard in Helper Utah.

Mobile Pumping Station: Mobile equipment used to transload crude oil from oil tanker trucks to railway cars.

Motor Control Center: A container for electrical feeds for the Wildcat Loadout Facility, i.e. motor starters, variable frequency drives, electrical breakers, etc.

Knock-out pots: A vessel that collects condensed materials prior to entry into process equipment.

Oil tanker truck: A semi-truck transporting crude oil from the Uinta Basin oil fields to the Wildcat Loadout Facility. An oil tanker truck is classified by UDOT as a combination unit truck.

Oil tanker truck delivery: The unloading or transloading of Uinta Basin crude oil from a single tanker truck.

Oil tanker truck pass: The number of truck passes measured at a point on a road. For example, one oil tanker truck delivery at Wildcat Loadout Facility would result in two oil tanker passes (entering and exiting) on Consumers Road.

Oil Train: One hundred and four (104) oil-carrying railway cars joined together.

Proctor: The maximum density for the soil at its optimum moisture content.

Product Stream: The product flow in a pipeline.

Railway car: A wheeled vehicle adapted to the rails of railroad, in this case for the purpose of hauling crude oil.

Railway car unit: Approximately thirty-five (35) railway cars joined together.

Rail tracks: A set of two parallel rows of long pieces of steel are used by trains to transport people or product.
Reference Area: An undisturbed area established for comparison of vegetation cover to judge reclamation success of a nearby disturbed area.

Substation: Equipment that reduces the high voltage of electrical power transmission to that suitable for supply to consumers.

Throughput: Barrels of crude oil being transferred daily thru the Wildcat Loadout Facility.

Transloading: The process of moving product (such as coal or crude oil) from trucks directly into railway cars without interim steps such as onsite storage.

Transloading facility: Equipment that makes possible the moving product (such as coal or crude oil) from trucks directly into railway cars without interim steps such as onsite storage>

Uinta Basin crude oil: Unrefined petroleum produced in the Uinta Basin.

Uinta Basin railway: An approved common-carrier railway for moving goods from the Uinta Basin to the railway system near Highway 6 and Soldier Summit. The railway is not yet built.

Union Pacific Railroad: One of Coal Energy Group 2's railway partners.

Unloading racks (also oil tanker truck loading racks): Equipment capable of unloading crude oil from oil tanker trucks into onsite storage tanks.

Utah Railway: One of Coal Energy Group 2's railway partners.

Utah Railway mainline: The main railway track used for through trains.

UTUT105525661: ConocoPhilips Company/Scout Energy Group/XTO Energy Oil and Gas Lease

UTUT106107053: Carbon County's Access Road

UTUT105884090: Carbon County's Geezer Backbone Trail

UTUT106092525: PacifiCorp doing business as Utah Power and Light's 48-kV powerline ROW near the Wildcat Loadout Facility.

UTUT105987487: Emery Telcom's buried communication line ROW near the Wildcat Loadout Facility.

UTUT106262560: CEG2's 270-acre ROW known as the Wildcat Loadout Facility.

UTUT106099056: Carbon County's Consumer Road ROW.

UTUT106235040: CEG2's ROW overlapping UTUT106262560 containing additional facilities.
UTUT106155575: Utah Railway's ROW containing their mainline and rail sidings that connect the Wildcat Loadout Facility with the Martin Yard in Helper Utah.

UTUT106103913: Pacificorp ROW for a switchrack (Beaver Creek Coal Tap to Tower Resources)

UTUT106107053: Carbon County access road to Wildcat Loadout

Vapor Balancing: The process of crude oil from an oil tanker truck into a railway car displacing vapors in the railway car which are then captured and returned via a hose to the truck. The vapors in the oil tanker truck usually condense back to liquids during the truck's return trip, which then mixes in with the next crude oil load.

Vapor combustion unit: Equipment capable of combusting any vapors generated during the railway car loading process.

Wildcat Loadout Facility: CEG2's 270-acre ROW for transloading crude oil from oil tanker trucks to railway cars

LIST OF ACRONYMS

AADT = annual average daily traffic

ACEC = Area of Critical Environmental Concern

API = American Petroleum Institute

bbl per day = barrels per day

bcf/day = billion cubic feet per day

BLM = Bureau of Land Management

CAA = Clean Air Act

CAP = Criteria Air Pollutant

CEG2 = Coal Energy Group LLC

CFR = Code of Federal Regulations

CH4 = Methane

CO = Carbon Monoxide

CO2 = Carbon Dioxide
CO2e = Carbon Dioxide Equivalent

dBA = decibel

EIA = U.S. Energy Information Administration

EPA = Environmental Protection Agency

ESA = Endangered Species Act

FLPMA = Federal Land Policy and Management Act

GHG = Greenhouse Gases

GRD = Green River District

GRSG = Greater Sage Grouse

HAP = Hazardous Air Pollutants

ID = interdisciplinary

JNM = Jurassic National Monument

LEPC = Local Emergency Planning Committee

Mt = Megatonnes

MG = motor and generator

MLRS = BLM's Mineral & Land Record System

MRP = mining and reclamation plan

MSHA = Mine Safety and Health Administration

N2O = Nitrous Oxide

NAA = Nonattainment Area

NAAQS = National and Utah Ambient Air Quality Standards

NEMA= National Electrical Manufacturers Association

NEPA = National Environmental Policy Act

NHPA = National Historic Preservation Act

NOx = Nitrogen Oxides

NO2 = Nitrogen Dioxide

NRHP = National Register of Historic Places

OPM = Office of Personnel Management

OSHA = Occupational Safety and Health Administration

PFO = Price Field Office

PFYC = Potential Fossil Yield Classification

PMLU = post mining land use

PM2.5 = Particulate Matter with diameters that are generally 2.5 micrometers and smaller

PM10 = Particulate Matter with diameters that are generally 10 micrometers and smaller

ppb = Parts per Billion

ppm = Parts per Million

PSD = Prevention of Significant Deterioration

PSM RMP= Process Safety Management standard and Risk Management Program

PUP = Pesticide Use Permit

RCRA = Resource Conservation and Recovery Act

RMP = Resource Management Plan

ROD = Record of Decision

ROW = Right-of-Way

SARA = Superfund Amendments and Reauthorization Act

SDS = Safety Data sheets

SERC = State Emergency Response Commission

SMCRA = Surface Mining Control and Reclamation Act

SO2 = Sulfur Dioxide

SPCC = Spill Prevention Control and Countermeasure Plan

STEO = Short-Term Energy Outlook

TEFC = Totally Enclosed Fan Cooled

TEPC = Tribal Emergency Planning Committee

TERC = Tribal Emergency Response Commission

TLA = Utah Trust Lands Administration

Tonnes = Metric Tons

UDOGM = Utah Division of Oil, Gas, and Mining

UDOT = Utah Department of Transportation

UPDES = Utah Pollutant Discharge Elimination System

U.S. = United States

USGS CONUS = United States Geological Society Conterminous United States reference data project

VOC = Volatile Organic Compounds

VRM = Visual Resource Management

WSA = Wilderness Study Area

WSR = Wild and Scenic River

A. APPENDIX A – ISSUES ANALYZED IN BRIEF

The following issues are analyzed in brief because they do not relate to how the Proposed Action or alternatives respond to the purpose and need or they have no potential for significant impacts.

A.1 – AIB-1 (Air Quality)

How would emissions associated with facility construction and operation affect ambient air quality in Carbon County?

The Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants (CAPs) considered harmful to public health and the environment: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). Oxides of nitrogen (NO_x) and volatile organic compound (VOC) emissions also contribute to secondarily formed pollutants of O_3 and $PM_{2.5}$ through a complex series of atmospheric chemical interactions. A detailed description of these pollutants, along with their health effects and their sources can be found on pages 6-10 of the BLM Utah Air Monitoring report (BLM 2024b). The EPA has established NAAQS for each of the criteria air pollutants (EPA 2023a). Air quality design values are statistical metrics, typically based on monitored data of ground-level atmospheric air pollutant concentrations over a three-year period, used to determine whether an area is in compliance with the NAAQS. Current design values for the 2022-2024 period are available from the EPA (EPA 2024a).

An airshed is a geographic area where air pollutants from various sources are likely to mix and affect air quality under the same atmospheric conditions. The scope of this analysis is Carbon County to best represent the airshed of this project. The selection also facilitates the analysis by using the best available air quality monitoring data, generally provided at the county level. Carbon County is designated as attainment for all NAAQS pollutants. Design values for Carbon County are presented in table A-1.

Table A-1. 2022-2024 Criteria Air Pollutant Design Values

Pollutant	County	Averaging Time	Design Value[1]	NAAQS	Percent of NAAQS
O_3	Carbon	8-hour	0.062 ppm[11]	0.070 ppm	90.0%
NO_2	Carbon	Annual	2 ppb	53 ppb	3.8%
NO_2	Carbon	1-hour	15 ppb[12]	100 ppb	15%

Source: EPA 2023b, retrieved from https://www.epa.gov/air-trends/air-quality-design-values

[11] Concentrations in parts per million (ppm) and parts per billion (ppb).

[12] The 1-hour design value for NO_2 is listed as invalid on EPA's website but has been included in the table to provide additional context to current conditions in Carbon County. It should also be noted that invalid design values cannot be used for attainment decisions by the Utah Department of Air Quality or the EPA.

Hazardous air pollutants (HAPs) are chemicals or compounds that are known or suspected to cause cancer or other serious health effects, such as compromises to immune and reproductive systems, birth defects, developmental disorders, or adverse environmental effects and may result from either chronic (long-term) and/or acute (short-term) exposure. The EPA's Air Toxics Screening Assessment (AirToxScreen) is used to estimate cancer and non-cancer health risks from air toxics across the United States based on emissions data, modeling, and monitoring. A cancer risk of less than 100 in one million (EPA 2024b) is considered within the acceptable range of exposure. The 2019 AirToxScreen assessment reports the total cancer risk in Carbon County as 12.33 in one million. A hazard index is a ratio that sums potential non-cancer health risks from multiple air toxics affecting the same target receptor, indicating the potential for adverse health effects. The hazard indices for Carbon County range from 0 to 0.12. A hazard index value less than one is not likely to be associated with adverse health effects (EPA 2024b).

The Proposed Action would result in CAP and HAP emissions associated with construction and operation. Construction emissions would be temporary (during construction only) and would originate from vehicle travel to and from the project location as well as from heavy construction equipment used to construct the facility. Operation would result in emissions from vehicle travel to and from the project location, unloading and loading activities, oil tanker trucks, railway cars and oil trains, stationary heaters, storage tanks, and a vapor combustion unit.

The Proposed Action would result in direct and indirect emissions of CAPs and HAPs. Direct emissions would result from construction activities, which would be temporary (during construction only), and operation of the facility. Construction emissions would include NO_x, SO_2, and CO tailpipe emissions from construction equipment and vehicle travel to and from the site. Fugitive dust (PM_{10} and $PM_{2.5}$) emissions would occur from vehicle traffic, construction equipment, and from wind erosion where soils are disturbed. During operation, NO_x, CO, and VOC emissions would originate from vehicle and equipment tail pipes, railway cars and oil trains, stationary heaters and engines, a vapor combustion unit, and loading and unloading activities. HAP emissions would also occur from storage tanks, loading and unloading activities, and other operational equipment. Indirect emissions would include truck tailpipe emissions from the transportation of oil to and from the Wildcat Loadout facility, train engine emissions and fugitive dust emissions from vehicle travel. The indirect emissions for this project would be dispersed over a large area throughout Uintah, Duchesne, and Carbon Counties.

Since oil hauling truck traffic in Uintah and Duchesne Counties is not anticipated to increase (see Analysis Assumption 4) emissions from truck traffic in those counties would also not increase. However, the Proposed Action would allocate existing oil hauling truck traffic from other facilities (within and outside of Carbon County) to the Wildcat Loadout Facility (Analysis Assumption 5). Therefore, emissions in Carbon County would increase from the truck traffic allocated from facilities outside of Carbon County. At the time of this analysis, it is uncertain how much of the truck traffic would be allocated from facilities outside of Carbon County. As a conservative estimate, total indirect emissions from crude oil hauling truck traffic that would occur within Carbon County are reported in the table below. Emissions from train engines traveling from the Wildcat Facility were calculated based on the one-way distance to the Martin Rail Yard (see section 3.6) and are included in the indirect emissions estimates presented below.

Emissions were estimated using company provided inputs and emissions factors from EPA's AP-42 and MOVES (Motor Vehicle Emissions Simulator) model. Emissions associated with the Proposed Action compared to county level emissions are presented in Table A-2.

Table A-2. Proposed Action's Emissions Compared to County Level Emissions.

	Emissions (Tons per Year)						
	VOC	**PM_{10}**	**$PM_{2.5}$**	**CO**	**NO_x**	**SO_2**	**HAPs**
Facility Construction	0.01	3.69	1.83	0.03	0.07	<0.01	<0.01
Facility Operation	26.02	2.46	0.71	8.94	6.15	0.53	2.96
Total Direct Emissions[1]	26.03	6.16	2.54	8.97	6.22	0.53	2.96
Indirect Emissions[2]	2.16	41.14	11.09	8.23	31.07	0.10	0.02
Total Project Emissions	**28.19**	**47.30**	**13.63**	**17.20**	**37.29**	**0.64**	**2.98**
Carbon County[3]	8,904.5	3,324.3	502.27	5,289.8	1,728.4	451.1	1,238.0
Project Contribution[4]	0.32%	1.39%	2.66%	0.33%	2.16%	0.14%	0.24%

1 – Direct emissions include construction and operation of the Wildcat Loadout Facility.
2 – Indirect emissions include emissions from crude oil hauling truck traffic that would occur within Carbon County and trains that would travel from the facility to the Martin Rail Yard.
3 – County level emissions are from the National Emissions Inventory. Retrieved from: https://www.epa.gov/air-emissions-inventories/2020-national-emissions-inventory-nei-data
4 – Percent contribution of the Proposed Action's emissions to the total emissions in Carbon County.

Utah Administrative Code R307-410-4 provides a list of emission rate thresholds applicable to stationary sources for when dispersion modeling should be performed for air quality permitting in attainment areas. These emissions rates are also listed in 40 CFR 52.21 (b)(23)(i) as part of the prevention of significant deterioration (PSD) rules. Stationary source emission rates below these thresholds are considered de minimis and an emissions review is deemed sufficient to demonstrate no adverse air quality impacts in attainment areas. Emission rates above the threshold would not necessarily have an adverse impact, but rather indicate that additional analysis, such as modeling or other considerations, is needed to verify that there would be no adverse impacts to air quality. The Proposed Action's stationary source (facility operation) emissions would be below the thresholds. It should be noted the facility operation emissions presented in table A-2 also include emissions from mobile sources that would operate at the facility and can be considered a conservative estimate of the facility's stationary source emissions. The company is currently operating under Approval Order DAQE-AN150710004-24. The Approval Order lists emissions control measures that would reduce impacts from the Proposed Action which include but are not limited to paving of haul roads and fugitive emissions monitoring (i.e., Leak Detection and Repair).

Emissions of CAPs and HAPs would also occur outside the planned area from additional transport, processing, distribution, and end-use. Oil transloaded at the Wildcat Loadout Facility is generally transported via railway to refineries on the Gulf Coast where they produce a multitude of refined products. Since combustion of all petroleum products emits CAPs and HAPs, local ambient concentrations of these pollutants could increase in areas where products exported from the Wildcat Loadout Facility are combusted. This could contribute to an area exceeding either national or local air quality standards. Air quality involves complex physical

and chemical transformations at a local/regional level, so impacts would vary considerably depending on background concentrations, meteorology, and other local pollutant sources. If any pollutant concentration is near or above its standard in a particular area, the combustion of oil products could contribute to or exacerbate nonattainment. Potential pollutant concentration change resulting from combustion is therefore often a key driver of public policy to mitigate air quality and public health impacts in such areas. Downstream combustion and end uses are regulated by the EPA or delegated to state agencies. This regulatory process is designed to avoid downstream impacts to regional and local air quality.

Past, present, and reasonably foreseeable impacts for air quality are the result of the incremental impacts from the Proposed Action when added to other past, present, and reasonably foreseeable future actions. Past and present actions that have affected and would likely continue to affect air quality in the analysis area are too numerous to list here but would include: ongoing oil and gas development and associated infrastructure, geophysical exploration, ranching, livestock grazing, range improvements, recreation (including off-highway vehicle use), authorization of rights-of-way for utilities and other uses, road and railway development, development or conversion of power plants, and the development of various industries that emit pollutants.

To assist in airshed management, the BLM has at times utilized air quality modeling. Modeling is based on reasonably foreseeable development. Products from modeling analyses are used for past, present, and reasonably foreseeable impacts analysis and source apportionment impact analysis (i.e., impacts from federal versus non-federal emissions). Results from the BLM Regional Modeling Study are included in the BLM 2023 Utah Air Monitoring Report (BLM 2024a), are incorporated by reference, and briefly summarized below. Additional modeling results (including information on HAPs and air quality related values) can be found on pages 42-59 of the BLM 2024 Utah Air Monitoring Report (BLM 2024b).

In general, past, present, and reasonably foreseeable concentrations for all modeled CAPs in the BLM Regional Air Model showed concentrations that did not lead to any violation of the NAAQS across Utah except for $PM_{2.5}$ and PM_{10}. These particulate exceedances were due to projected wildfire episodes. The BLM Regional Air Model showed that sources outside of Utah have a large contribution to the maximum O_3 concentrations in Utah. The largest contributions to modeled NO_2 and SO_2 concentrations were from other anthropogenic and natural (i.e., wildfires) source categories. Locations with maximum 1-hour CO concentrations also had PM_{10} peaks due to wildfires indicating that wildfires were likely also responsible for the high CO concentrations.

In summary, emissions would be below the thresholds outlined in Utah Administrative Code R307-410-4, would be indistinguishable from background concentrations as measured by regulatory monitors or predicted by models, and would not affect air quality to a degree that a detailed analysis is required.

General Conformity Review

Section 176(c) of the Clean Air Act requires Federal agencies' actions to conform to applicable implementation plans for attaining and maintaining the NAAQS. Federal actions occurring within non-attainment areas are subject to General Conformity Regulations (40 CFR 93.153). The facilities and loadout activities would occur in Carbon County which is designated as

attainment of the NAAQS. However, oil tanker trucks that would transport oil to the Wildcat Loadout Facility would originate within the Uinta Basin 8-hour O_3 Moderate Nonattainment Area (NAA). NAAs are designated by EPA and State regulatory agencies as having monitored criteria pollutant concentrations that exceed the NAAQS.

As stated in Section 3.2, Uinta Basin oil production and transportation of crude oil to or from the Wildcat Facility is outside of the BLM's regulatory authority and control. Direct emissions (40 CFR 93.152) related to this project (i.e., facility construction and operation) would be located outside of the NAA and thus are not subject to the General Conformity Rule. Indirect emissions (40 CFR 93.152) would be limited to vehicle travel on public roads. Vehicle emissions during public travel are not subject to the General Conformity Rule because the BLM does not exercise continuing program responsibility (40 CFR 93.152) over public travel. Further, emissions in the NAA associated with the Wildcat Loadout Facility would occur regardless of the BLM's decision, as CEG2 would expand their facility onto TLA lands to achieve their desired throughput of 100,000 bbls per day in the event BLM were to deny the ROW. Therefore, emissions in the NAA would still "occur in the absence of the Federal action" and would not be "caused by" the federal action (40 CFR 93.152) and are thus not subject to General Conformity. Therefore, General Conformity does not apply to the Proposed Action.

A.2 – AIB-2 (Greenhouse Gas)

How would the proposed facility construction and operation contribute to greenhouse gas emissions?

Greenhouse gases (GHGs) act to contain solar energy loss by trapping longer wave radiation emitted from the Earth's surface and act as a positive radiative forcing component. GHGs may influence the global climate by increasing the amount of solar energy retained by land, water bodies, and the atmosphere. GHGs can have long atmospheric lifetimes, which allows them to become well mixed and uniformly distributed over the entirety of the Earth's surface no matter their point of origin. The buildup of these gases has contributed to the current changing state of the climate equilibrium towards warming.

Further discussion of climate science and predicted impacts as well as the past, present, and reasonably foreseeable GHG emissions associated with BLM's oil and gas actions are included in the 2023 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (BLM 2024a) (hereinafter referred to as the Annual GHG Report). This report presents the estimated emissions of greenhouse gases attributable to development and consumption of fossil fuels produced on lands and mineral estate managed by the BLM and is available at https://www.blm.gov/content/ghg/?year=2023.

A discussion of past, current, and projected future GHG impacts are described in Chapters 4, 8, and 9 of the Annual GHG Report. Additional information on current state, national, and global GHG emissions as well as the methodology and parameters for estimating past, present, and reasonably foreseeable GHG emissions is included in the Annual GHG Report (see Chapters 5,6, and 7).

The incremental contribution to global GHGs from a single proposed land management action cannot be accurately translated into its potential global or localized climate effects in the area specific to the action. Currently, global climate models are unable to forecast local or regional effects on resources resulting from a specific subset of emissions. However, there are general projections regarding potential impacts on natural resources and plant and animal species that may be attributed to the accumulation of GHG emissions. In this EA, the BLM uses GHG emissions as a proxy for impacts and provides context with other proxies such as GHG equivalents.

Table A-3 shows the total estimated GHG emissions from fossil fuels at the global, national, state, and county scales over the last five years. Emissions are shown in megatonnes (Mt) per year of carbon dioxide equivalent (CO_2e). Chapter 3 of the Annual GHG Report contains additional information on GHGs and an explanation of CO_2e. State and national energy-related CO_2 emissions include emissions from fossil fuel use across all sectors (residential, commercial, industrial, transportation, and electricity generation) which are released at the location where the fossil fuels are consumed.

Table A-3. Global and U.S. Fossil Fuel GHG Emissions 2018 - 2022 (Mt CO_2e/yr)

Scale	2018	2019	2020	2021	2022
Global (CO_2 only)	37,831.9	37,824.9	35,944.5	38,082.2	38,521.9
U.S.	4989.8	4855.9	4344.9	4,639.1	4699.4
State	60.0	60.4	56.7	61.3	59.4[2]
Carbon County[1]	0.70	0.65	0.50	0.57	0.58

Source: Annual GHG Report, Chap. 5, Table 5-1 (U.S.) and Table 5-2(State). Global emissions (CO_2 only) from the Emissions Database for Global Atmospheric Research (EDGAR)
Mt (megatonne) = 1 million metric tons
NA = Not Available
1 - County level data are from EPA's Facility Level Information on Greenhouse Gases Tool (EPA 2023) - https://ghgdata.epa.gov/ghgp/
2 – State emissions for the 2022 reporting year are retrieved from https://www.epa.gov/ghgemissions/methodology-report-inventory-us-greenhouse-gas-emissions-and-sinks-state-1990-2022

The Proposed Action would lead to emissions of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). These GHG emissions would be emitted during construction and operation of the facility. Construction emissions would be temporary (during construction only) and would originate from vehicle travel to and from the project location as well as from heavy construction equipment used to construct the facility. Operation would result in emissions from vehicle travel to and from the project location, unloading and loading activities, oil tanker trucks, railway cars and oil trains, stationary heaters, storage tanks, and a vapor combustion unit. Operational emissions would occur over the entire life of the facility, which is assumed to be 20 years for this analysis based on the estimated life of the project. As stated in section 3.2.1, total mileage that oil haul trucks travel would decrease since the distance to the Wildcat Loadout Facility would be less than the distance to where the oil is currently going (Salt Lake or other refineries). Therefore, GHG emissions from truck traffic related to the Proposed Action would also be

anticipated to decrease. As a conservative estimate, BLM assumed a net-zero change in GHG emissions related to oil hauling truck traffic. Therefore, the emissions presented below are representative of facility construction and operation only.

GHG emissions were calculated based on the maximum throughput of the facility. Maximum facility throughput would be 100,000 bbls per day (per DAQE-AN150710004-24 and limitations on the trucking capacity of Consumer Road). Table A-4 shows the estimated maximum year and life of project GHG emissions for both 100-yr and 20-yr global warming potentials (GWP). Section 3.4 of the Annual GHG Report provides a detailed explanation of GWP.

Table A-4. Estimated GHG Emissions from the Proposed Action on a Maximum year and Life of Project Basis (tonnes)

	CO_2	CH_4	N_2O	CO_2e (100-yr)	CO_2e (20-yr)
Max Year[1]	8,644.54	0.17	0.09	7,868.85	7,876.98
Life of Project	172,890.87	3.40	1.78	157,376.92	157,539.69

1 – Maximum year emissions include GHG emissions from construction and operation of the Wildcat loadout Facility, assuming maximum throughput would be achieved in the first year after construction.

The Environmental Protection Agency (EPA) GHG permitting programs only apply to major stationary sources emitting over 100,000 metric tons (mt) carbon dioxide equivalent (CO_2e) per year (e.g., power plant, landfill, etc.) or modifications of major sources with emission increases greater than 75,000 mt CO_2e per year. Additionally, the EPA requires annual reporting for facilities with stationary sources that emit 25,000 mt CO_2e per year to provide a basis for future policy decisions and regulatory initiatives regarding GHG's. Maximum annual emissions associated with the Proposed Action are estimated to be 7,876.96 mt CO_2e per year and would not trigger EPA rules, permitting, or reporting requirements. Since, emissions associated with the Proposed Action would be below EPA's permitting and reporting thresholds GHGs would not be affected to a degree that a detailed analysis is required.

Past, Present, and Reasonably Foreseeable Trends and Actions

As stated in section 3.2, Uinta Basin oil production, transportation of crude oil from the Martin Yard, and refining and downstream use of the oil are outside of the BLM's regulatory authority and control. GHG emissions from any federal oil that would pass through the facility that are a result of BLM approved actions are included in the emissions presented in the Annual GHG Report.

A.3 – AIB-3 (Cultural Resources)

How would the Proposed Action impact cultural resources in the area of potential effect*?*

Pursuant to Section 106 of the National Historic Preservation Act, its implementing regulations at 36 CFR Part 800, and the State Protocol Agreement Between the Bureau of Land Management and the Utah State Historic Preservation Office Regarding the manner in which the Bureau of Land Management will meet its Responsibilities under the National Historic Preservation Act as provided for in the National Programmatic Agreement (2020), this project is a federal undertaking with the potential to effect historic properties (36 CFR 800.3([a]). Therefore, a Class

III Intensive Field Survey to identify cultural sites and historic properties (National Register of Historic Places-eligible sites) in the area of potential effect was conducted in May of 2023, by PFO archeologist resulting in 4.61 acres of BLM land being inventoried (U23BL0691). This smaller survey was conducted on lands that were not surveyed as part of the 2013 Class III survey. One previously recorded site as eligible for the National Register of Historic Places (NHPA) was revisited and no contributing features were observed. One isolated find was documented and determined not eligible for the NRHP. The BLM has made an undertaking determination of no historic properties affected directly and indirectly (physically, visually, auditorily and atmospherically). As the site has no contributing features and isolated finds are not eligible for the NRHP, there would be no significant impact to cultural resources from this Proposed Action. Due to the project size and finding of effect, the report was sent to SHPO under the Small-Scale Programmatic Agreement and received April 12th, 2024 (Case No. 24-0813).

A.4 – AIB -4 (Native American Concerns)

How would the Proposed Action impact Native American concerns?
Agency staff undertook an analysis of whether tribal consultation would be required or appropriate consistent with Executive Order 13175 and the 2022 Presidential Memorandum on Uniform Standards for Tribal Consultation for this undertaking, which is the modification of the existing Wildcat Loadout ROW. After considering this analysis, the agency official determined there is a reasonable basis that the Proposed Action could have tribal implications, as defined at EO 13175.1[a]. Tribal consultation letters were mailed and emailed on May 8, 2025.
No sacred sites were identified in the area of potential effects. Tribal Nations did not notify the BLM of any sacred sites or Native American ceremonial sites within the area of potential effects and therefore there are no resources available for a detailed analysis. The Paiute Tribe of Utah responded on June 16th, 2025, requesting to participate in the NEPA process. This consultation process is ongoing as of June 17, 2025.

A.5 – AIB-5 (Farmlands (prime/unique))

How would the Proposed Action impact prime and/or unique farmlands within the ROW?
After a Web Soil Survey review (accessed 5/12/25) there are soils rated as Prime if irrigated (48 Haverdad loam and 52 Hernandez family), however irrigation is inconsistent with the 2008 approved PFO RMP which does not permit irrigation on BLM administered lands. In the 2008 PFO RMP, LAR-7 does not allow for agricultural leasing or agricultural entry due to lack of water or access. The rest of the ROW is rated as Not Prime Farmland, and it is not anticipated that this resource requires additional analysis.

A.6 – AIB-6 (Fuels/Fire Management)

How would the Proposed Action impact fire and fuels management and the potential for wildfire within the ROW?

Based on a site visit, implementation of the Proposed Action would not affect Fuels and Fire Management Resources to a degree that further analysis is required, due to the low amount of fuels within the ROW. It is a previously disturbed area void of vegetation, and it would not contribute to fire spread. Therefore, the fuels would not be sufficient in carrying fire. There are no planned fire and fuels management action in the area therefore, the act of the Proposed Action would not inhibit BLM from being able to conduct fire and fuels management.

The potential for fires to ignite from a railway car or oil tanker truck accident is addressed sections 3.4 and 3.5).

A.7 – AIB-7 (Geology/Minerals/Energy Production)

How would the Proposed Action impact geological and mineral resources, and energy production within and adjacent to the ROW?

Under the Proposed Action, the planned additional infrastructure would be located within the existing ROW, so no new impacts are expected. The BLM would retain mineral rights and could still authorize future mineral activity on these lands because they are open to leasing in the 2008 PFO RMP. Lessees may also explore the fluid mineral resources under the leases through use of directional drilling from sites outside the ROW. Moreover, there is only one oil and gas special act ROW lease (UTU-079159) for minerals below the ROW lands, located in T. 13 S., R. 9 E., Sec. 33, SW1/4, the lessee would still have access to these minerals subject to lease stipulations. Therefore, there would be no effect on mineral development associated with that leasehold interest.

With respect to minerals associated with lands outside of the ROW but adjacent to, there would also be no impacts to mineral development because the ROW would not limit access to those minerals. According to the BLM's and Utah Division of Oil, Gas & Mining's GIS data, there is an oil and gas lease (UTU 079159) within the 270-acre ROW and oil and gas leases in adjacent sections south of the ROW. The closest producing well (4300730617) is 0.25 miles south of the ROW. There were a few wells planned to be drilled within the ROW over 20 years ago, but they were not. If there is renewed interest in drilling, further analysis would be done when an APD is received. Therefore, effects to leaseholders in and near the ROW are not considered further in this document.

The Proposed Action is responding to an application seeking to move currently generated Uinta basin crude oil to market. The Proposed Action would not result in or trigger new oil production, which is driven by market demand and world events (EIA 2024b).

A.8 – AIB-8 (Lands/Access)

How would the Proposed Action impact lands and access within the ROW?

Because the Proposed Action is a modification of an existing ROW, it is compatible with existing land uses in the vicinity of the ROW. The BLM reviewed their Mineral & Lands Record System (MLRS) and the Master Title Plats. Other existing ROWs that touch or are in the immediate vicinity of the Wildcat Loadout ROW include CEG2 and the following:

- Utah Rail Company SL-0-015794 rail tracks

- PacifiCorp dba Utah Power and Light UTU-20384 48-kV powerline, and UTU- 53815 switch rack
- Emery Telcom UTU-32293 buried Communication Line
- Carbon County UTU-54688 Consumer Road
- Utah Rail Company has control over traffic it allows on its tracks in its ROW and would not be impacted as a result.

Traffic on Consumers Road is analyzed in section 3.4. Carbon County holds the Consumers Road ROW. It is supportive of the increased traffic that may occur (Communication with Carbon County, 2025). There are no changes anticipated under the alternatives that would lead to a modification in the Carbon County ROW, such as widening or realigning, therefore lands and access is not analyzed in detail.

A.9 – AIB-9 (Livestock Grazing and Rangeland Health Standards)

How would the Proposed Action impact livestock grazing and Rangeland Health Standards within the ROW?
The ROW is within the Consumers Wash Allotment; however, all work will occur within the existing ROW, which is already fenced off to exclude livestock from entering the ROW. No impacts to livestock grazing or Rangeland Health are anticipated because of the existing fence.

A.10 – AIB-10 (Paleontological Resources)

How would the Proposed Action impact paleontological resources within the ROW?
The ROW is Potential Fossil Yield Classification (PFYC) 3 (Mancos Shale), indicating some potential for encountering paleontological resources. Scientifically important paleontological resources are not expected to be disturbed or damaged by the proposed activity because the PFYC 3 geologic units in the area are previously disturbed and paleontological resources in this Member in this area are typically common invertebrates.

A.11 – AIB-11 (Plants: Invasive and Noxious Weeds)

How would the Proposed Action contribute to introduction and spread of invasive species and/or noxious weeds within and adjacent to the ROW?
Surface disturbing activities have the potential to introduce/spread invasive species/noxious weeds. There are invasive species & noxious weeds within the ROW. After a GIS review (accessed 5/12/25) and with local site knowledge, there are several noxious/invasive weeds species present in the ROW or immediately adjacent to it that include, but is not limited to: tamarisk, musk thistle, cheatgrass and Russian thistle. Design Feature 2.2.2.8 is a commitment to monitor, plan and control any additional invasion of noxious and invasive species. If spraying on BLM administered lands, the proponent must submit a Pesticide Use Proposal (PUP) that then must be approved before treatment can occur with BLM approved chemicals. Prevention actions outlined in the 2024 Record of Decision for Vegetation Treatments Using Herbicides on Bureau of Land Management lands in 17 Western States, Programmatic Environmental Impact

Statement (Appendix A) and attached as Design Feature 2.2.2.8. would be followed by the proponent. Equipment used would be washed prior to use to remove mud and debris that may contain invasive or noxious weed seeds and help to reduce the chance of invasive or noxious weed spread. Because of these Design Features, noxious and invasive weeds has not been carried forward for detailed analysis.

A.12 – AIB-12 (Plants: Native Vegetation)

How would the Proposed Action impact native vegetation within the ROW?
Based on site visit and GIS review, the ROW has sparse native vegetation cover due to the Project Location being previously disturbed in the ROW since at least the 1980s. Approximately ninety percent of the vegetation that is present within the ROW is non-native invasive species, approximately five percent is non-native noxious weeds, and approximately five percent is native plants, which occurs along the outer edges of the previously disturbed area. Because of this previous disturbance and lack of native vegetation it is anticipated that native vegetation would be limited in the ROW for the life of the facility. After the life of the facility has concluded, it is expected that reclamation efforts would be implemented to restore native vegetation to appropriate levels following the Green River District (GRD) Reclamation Guidelines. Therefore, native vegetation will not be impacted to a degree that it has been brought forward for detailed analysis.

A.13 – AIB-13 (Recreation)

How would the Proposed Action impact recreation in the ROW and in the immediate area?
The ROW is in an Extensive Recreation Management Area where recreation opportunities, facilities, and needs are limited. Implementation of the ROW would have minimal impact on recreation, because it is within a previously disturbed ROW where there are no recreation sites. The facility is located just off the main paved road, and recreation access beyond this facility to places like Gordon Creek will not be changed. Therefore, detailed analysis is not warranted.

A.14 - AIB-14 (Socioeconomics)

How would the Proposed Action impact employment, labor income and value added in Carbon County?
Construction: There would be short-term economic benefits during construction of the loadout either on the BLM ROW or on the leased TLA lands. Construction is anticipated to take 6-8 months and employ approximately 50 people. Construction would include creating two permanent storage tanks, adding additional rail tracks, truck unloading lanes, unloading racks and railcar loading racks. The inactive coal loading equipment will also be removed as necessary to provide an area for construction. The construction needs would include manual laborers, skilled concrete workers, welders, and track-hoe, back-hoe, grader, crane and dozer operators. According to Headwaters (https://headwaterseconomics.org/tools/blm-profiles/), non-services related jobs like construction account for 17.5% of the total jobs in Carbon County and 15.5% of

the total in the State of Utah. Wildcat could employ these skilled construction workers from anywhere in the State. This is normally based on bids from companies so the workers may not necessarily be from local communities. The state average annual wage for this type of employment is $68,433 (https://jobs.utah.gov/wi/data/library/index.html).

Other Highway users: Under both alternatives, truck travel would increase and lead to an average of approximately 345 truck deliveries. These are freight corridors connecting the Uinta Basin in northeastern Utah to central parts of the state that support the economies within the Uinta Basin and Carbon County. They are also key routes used by oil and gas exploration, recreational users, and commuters. In addition, all three routes are part of Dinosaur Diamond Scenic Byway which provides motorists access to several vistas, wildlife viewing, and mountainous high desert scenery, and connects several prehistoric sites such as Dinosaur National Monument and Jurassic National Monument. Traffic volumes on the highways can affect the condition of the roads, traffic flow, and user experience.

Trucks and Truck Drivers: In 2023, transportation and warehousing employment equaled 77,354, and the annual monthly stable job wage was 5,204 in Utah. The number of separations from employment vs. new hires were both in the 60,000 to 65,000 range (https://jobs.utah.gov/wi/data/library/employment/emptrends.html). According to the US Bureau of Labor statistics employment of heavy and tractor-trailer truck drivers is projected to grow 5 percent from 2023 to 2033, about as fast as the average for all occupations. In the US, about 240,300 openings for heavy and tractor-trailer truck drivers are projected each year, on average, over the decade. Many of those openings are expected to result from the need to replace workers who transfer to different occupations or exit the labor force, such as to retire[13].

The anticipated number of trucks and truck drivers needed to transport a maximum throughput of 100,000 bbls per day would be approximately 143. This calculation is based on 345 deliveries per day, and that most trucks may deliver 3 times per day. This is an increase of approximately 82 trucks and truck drivers needed. Most of the drivers that are employed currently come from the Uinta Basin or other areas to the north of Carbon County. If these trucks or drivers are not readily available this could lead to a short-term decrease in the amount of bbls/day that could be transloaded. However, Wildcat has had this problem in the past and has been able to remedy it within a few weeks.

Trains: The Wildcat Loadout expansion would increase the number of train cars per day from 48 to 160. This would increase number of trains from one full train (104 cars) every 2.16 days, to one full train every .65 days. Train operators are included in the State of Utah numbers above for transportation and warehousing employment. According to the US Bureau of Labor Statistics, employment of railroad workers in the US is projected to grow 2 percent from 2023 to 2033, slower than the average for all occupations. Despite limited employment growth, about 7,300 openings for railroad workers are projected each year, on average, over the decade. Most of those openings are expected to result from the need to replace workers who transfer to different occupations or exit the labor force, such as to retire. The median annual wage for railroad

[13] *https://www.bls.gov/ooh/transportation-and-material-moving/heavy-and-tractor-trailer-truck-drivers.htm#:~:text=in%20May%202024.-,Job%20Outlook,on%20average%2C%20over%20the%20decade*

workers was $75,680 in May 2024. According to https://www.aar.org/issue/crew-size/ the average crew size for a train is two people. They also state that it is becoming more common to see a crew of one. The increase in trains might create employment for one more person when they reach maximum throughput.

Trains are a significant part of the global economy and a critical pillar of the US economy. In the US, rail transportation contributes approximately 233 billion in total economic output, 66 billion in total household income, 25 billion in annual tax revenues, supporting federal, state, and local government budgets, and 26 billion in annual reinvestments. Utah is included in these numbers but is not one of the top 5 states that make up 34% of this contribution. The societal benefits of freight rail further demonstrate its critical role in economic sustainability, environmental efficiency, and infrastructure optimization. By reducing fuel consumption, greenhouse gas emissions, highway congestion, and public infrastructure costs, rail transportation enhances the resilience and sustainability of the U.S. freight network (https://www.aar.org/wp-content/uploads/2025/02/AAR-PE-Economic-Impact-Report-2025-FINAL.pdf). [1]

CEG2 would further develop its transloading facilities under either alternative so the impacts are expected to be the same. Any impacts to socioeconomics would not be concentrated in Carbon County but instead spread across multiple counties or the whole state of Utah. The employment, labor income and value added would not lead to a shift in the social or economic landscape in Carbon County therefore socioeconomics has not been brought forward for detailed analysis.

A.15 - AIB-15 (Soils (Physical/Biological))

How would the Proposed Action impact physical and biological soils within the ROW?
After a Web Soil Survey review (accessed 5/12/25) the dominant soils types in the ROW are 29: Dumps, mine, 48: Haverdad loam, 52: Hernandex family and 113 Strych very stony loam. These soils are rated from slight to moderate for Erosion Hazard (Road, Trail) Some soils are not rated for Soil Restoration Potential, but those that are mapped have either Moderate or High Soil Restoration Potential ratings. Additional disturbance within the already disturbed area could increase erosion. Based on site analysis, the Plan of Development contains site grading processes to minimize erosion (section 2.2.1). Because this site has been disturbed for over 40 years, and is within the existing ROW with active disturbance, it is anticipated that soil health and function would be limited in the ROW for the life of the facility. However, after the life of the facility has concluded, it is expected that reclamation efforts would be implemented to restore native vegetation to appropriate levels following the Green River Districts (GRD) Reclamation Guidelines. Therefore, it is not anticipated that impacts to this resource require a detailed analysis.

There are no biological soils within the ROW because the area has been previously disturbed.

A.16 – AIB-16 (Visual Resources)

How would the Proposed Action impact visual resources within the ROW?
The ROW is within a VRM Class 3 area. Class 3 objectives are to partially retain the existing character of the landscape, with a moderate level of change allowed. With design features to make the facilities Covert Green, the new development in an already-built area would not change the visual contrast and would meet the standards of VRM Class 3 managements. Therefore, detailed analysis is not warranted.

A.17 – AIB-17 (Wastes (hazardous and solid))

How would the Proposed Action contribute to hazardous and solid wastes within the ROW?
OPM's Process Safety Management (PSM) standard and Risk Management Program (RMP) regulations do not apply because the flammable liquids are exempted or excluded as they will be stored only incident to transportation.

Safety Data Sheets (SDS) or a list of hazardous chemicals must be submitted to State or Tribal Emergency Response Commission (SERC or TERC), Local or Tribal Emergency Planning Committee (LEPC or TEPC), and the local fire department for chemicals or materials in volumes subject to reporting under the Superfund Amendments and Reauthorization Act (SARA) Title III, that required Safety Data Sheets (SDS). An annual inventory of these chemicals must also be submitted by March 1 of each year to their State or Tribal Emergency Response Commission (SERC or TERC), Local or Tribal Emergency Planning Committee (LEPC or TEPC), and local fire department. The information submitted by facilities must be made available to the public. The potential impacts resulting from a spill and mitigation to prevent the spill from being released into the environment will be addressed in the facilities Spill Prevention and Countermeasures Plan (SPCC). The Resource Conservation and Recovery Act (RCRA) may be triggered in the event of a spill. Because the Wildcat Loadout Facility maintains SDS onsite and maintains a SPCC plan, both of which provide measures to prevent spills, respond to spills, and mitigate spills, this resource was dismissed from detailed analysis.

A.18 – AIB-18 (Water: Groundwater Quality)

How would the Proposed Action impact groundwater quality within or near the ROW?
According to GIS review, there are no protected groundwater sources in the area. The nearest one is approximately 9.5 linear miles northwest.

The Proposed Action would occur on approximately 30- acres of previously disturbed land within a 270-acre ROW that are already disturbed and have a water runoff system in place. Distance to protected sources, project design, existing systems, and the Design Features in section 2.2.2, 2.2.2.4, 2.2.2.6, and 2.2.2.7 avoid or mitigate impacts to these resources lower in the watershed. So, there is no potential for impacts that warrant detailed analysis.

A.19 – AIB-19 (Water: Hydrologic Conditions (stormwater))

How would the Proposed Action impact hydrologic conditions within or near the ROW?

Per GIS data review and local knowledge, the nearest major body of water is the Price River, which is located approximately 2.5 miles east of the ROW.

The Proposed Action would be on approximately 30- acres of previously disturbed land within a 270-acre ROW that have a water runoff system in place (section 2.1.1). Improvements to the water runoff system are proposed in section 2.2.2 and include regrading the site, filling in a sediment pond, extending a second sediment pond, and moving a culvert to accommodate the new truck traffic pattern inside the ROW. The improvements also include drainage ditches to collect runoff from areas on the northeast end of the facility and divert storm water runoff into a sediment pond.

The SPCC plan (section 2.2.2.4) with its required staff trainings and Storm Water Pollution Prevention Plan (as required by the site's UPDES permit) (section 2.2.2.7), would help control erosion and sediment by diverting runoff within the facility to sediment ponds. Because of distance to Price River, site design, and permit requirements, stormwater runoff would not have a potential for impacts that warrant detailed analysis.

The existing rail between the Wildcat Loadout Facility and the Martin Yard crosses an ephemeral wash. The intersection between Consumers Road and Highway 6 is 0.1 mile west of the Price River. Effects from railway car and oil tanker truck spills are addressed sections 3.4 and 3.5.

A.20 – AIB-20 (Water: Municipal Watershed / Drinking Water Source Protection)

How would the Proposed Action impact municipal watersheds and drinking water resources within or near the ROW?

Per GIS review, there are no protected groundwater sources in the area. The nearest one is approximately 9.5 linear miles Northwest.

The ROW would occur within a Surface Source Protection Zone 4, as defined in https://documents.deq.utah.gov/drinking-water/rules/DDW-2018-003500.pdf, which means it is furthest from the source zone (the Price River Intake) that is used for municipal water and is approximately 1.5 to 2 linear miles from zone 3 respectively north, east and south of the ROW boundary.

The Proposed Action would be on approximately 30- acres of previously disturbed land within a 270-acre ROW that has a water runoff system in place. Distance to protected sources, project design, existing systems, and the Design Features in section 2.2.2, 2.2.2.4, 2.2.2.6 and 2.2.2.7 avoid or mitigate impacts to these resources lower in the watershed. Therefore, there are no impacts anticipated that warrant detailed analysis.

A.21 – AIB-21 (Water: Streams, Riparian, Wetlands, Floodplains)

How would the Proposed Action impact streams, riparian areas, wetlands and floodplains within or near the ROW?

None of these resources are within the 270-acre ROW per review of GIS aerial imagery and GIS database review. The nearest streams, riparian, wetlands, and floodplains are along the Price River located approximately 2.5 linear miles to the east of the ROW.

The Proposed Action would be on approximately 30- acres of previously disturbed land that have a water runoff system in place. Dust and erosion at the site is controlled by magnesium chloride treatments as well as an existing water runoff system that captures and contains storm water. Changes to the water runoff system are proposed in section 2.2.2 to accommodate the new truck traffic pattern. Distance to protected sources, project design, existing systems, and the Design Features in section 2.2.2, 2.2.2.4, 2.2.2,6 and 2.2.2.7 avoid or mitigate impacts to these resources lower in the watershed. Therefore, potential for impacts does not warrant detailed analysis.

The existing rail between the Wildcat Loadout Facility and the Martin Yard crosses an ephemeral wash. The intersection between Consumers Road and Highway 6 is 0.1 mile west of the Price River. Effects from railway car and oil tanker truck spills are addressed sections 3.4 and 3.5.

A.22 – AIB-22 (Water: Surface Water Quality)

How would the Proposed Action impact surface water quality within or near the ROW?
Within the 270-acre ROW, per GIS aerial and GIS data, the surface water that would occur would primarily be during precipitation events. See also the Stream section above.
The Proposed Action would be on approximately 30- acres of previously disturbed land that have a water runoff system in place (section 2.2.2). Dust and erosion at the site is controlled by magnesium chloride treatments as well as an existing water runoff system that captures and contains storm water. Changes to the water runoff system are proposed in section 2.2.2 to accommodate the new truck traffic pattern.

The SPCC plan (section 2.2.2.4) with its required staff trainings and Storm Water Pollution Prevention Plan (as required by the site's UPDES permit) (section 2.2.2.7), would help control erosion and sediment by diverting runoff within the facility to sediment ponds. Because of distance to Price River, site design, and permit requirements, stormwater runoff was dismissed from detailed analysis.

The existing rail between the Wildcat Loadout Facility and the Martin Yard crosses an ephemeral wash. The intersection between Consumers Road and Highway 6 is 0.1 mile west of the Price River. Effects from railway car and oil tanker truck spills are addressed sections 3.4 and 3.5.

A.23 – AIB-23 (Wildlife: Migratory Birds including Raptors)

How would the Proposed Action impact migratory birds including raptors within the ROW and within a one-mile buffer?

There is no RMP designated migratory bird nesting habitat within the ROW. Although migratory birds may occur within the ROW, the area is already disturbed and is actively in use for loadout operations. These elements would discourage current and future nesting activities in the ROW. Raptor nests are known to occur a mile away on the cliffs outside of the ROW. Considering the lack of migratory bird habitat, distance to known nests, and the Design Features (section 2.2.2.9) migratory birds and raptors were dismissed from further analysis.

However, vehicle strikes and noise and light impacts from traffic and trains are addressed sections 3.4 and 3.5).

A.24 – AIB-24 (Wildlife: Fish (Designated or Non-designated))

How would the Proposed Action impact fish within the Green River watershed?
Per GIS review there are no known populations of threatened or endangered fish species or any known habitat within the ROW. The ROW is in the greater Green River watershed and ROW modification surface disturbing activities could have impacts on waterways that lead into critical habitat on the Green River. Section 2.2.2.4 outlines a Spill Prevention, Control, and Countermeasures that would reduce the likelihood a contaminant would end up in waterways that connect to critical habitats. Given the lack of populations in the ROW, and the Spill Prevention, Control, and Countermeasure plan to handle contaminates, there would be no potential impact to threatened and endangered fish or BLM sensitive fish species that would require detailed analysis.

The existing rail between the Wildcat Loadout Facility and the Martin Yard crosses an ephemeral wash. The intersection between Consumers Road and Highway 6 is 0.1 mile west of the Price River. Effects from railway car and oil tanker truck spills are addressed sections 3.4 and 3.5.

A.25 – AIB-25 (Wildlife: Non-USFWS Designated)

How would the Proposed Action impact non-USFWS designated wildlife within the ROW, along Consumers Road, and along the Wildcat Loadout Facility to Martin Yard railway
Per GIS review:
Elk: The ROW is within the 241,770-acre crucial winter elk habitat. The ROW is on the far east border of the defined crucial winter elk habitat. Consumers Road is not within the crucial winter habitat. Since the ROW already exists, it is anticipated there would be no impact to elk habitat that would require detailed analysis.

Deer: The ROW is within an about 40,000-acre crucial winter deer habitat unit named Wasatch-Manti. Gordon Creek Wildlife Management Area is 1.2 miles from the ROW. Gordon Creek is known to hold many mule deer during the winter due to its crucial winter habitat for deer. Since mule deer population trends listed in the Utah Mule Deer Statewide Management Plan from 2013-2018 timeframe has consistently trended in a positive increase, detailed analysis is not needed.

However, vehicle strikes and noise and light impacts from traffic and trains are addressed sections 3.4 and 3.5).

A.26 – AIB-26 (Wildlife: Threatened, Endangered, Proposed or Candidate)

How would the Proposed Action impact threatened, endangered, proposed or candidate wildlife species within the ROW and a ¼ or ½ mile buffer?

IPAC (USFWS's Information for Planning and Consultation website https://ipac.ecosphere.fws.gov/) shows Mexican Spotted, Yellow-billed Cuckoo, Suckely's cuckoo bumble bee, and monarch butterfly as the species that could potentially occur within ½ mile of the ROW. Following an on the ground assessment by BLM biologists multiple times during 2023 and 2024, Mexican Spotted Owl, Yellow-billed Cuckoo, and Suckley's cuckoo bumble bee are not present because and they do not have suitable habitat or known occupied locations within the ROW and the immediate surrounding area. Therefore, there is no known effect to these species. Monarch butterfly has the potential to occur within the ROW where milkweed plants are found. Based on site visits, there are no milkweed plants or pollinating plants that this species would use so there is no jeopardy to the monarch butterfly.

According to USGS CONUS habitat models, Golden Eagle, kit fox, Townsend's big-eared bat, spotted bat, great plains toad all have potentially suitable habitat within the ROW. A site visit determined that there is no habitat for these species within the ROW due to the site being previously disturbed, however there may be adequate habitat nearby that these species use.

Greater Sage-Grouse (GRSG):
According to the applicable Utah Greater Sage-grouse (GRSG) Approved RMP Amendment (2015 ARMPA) (BLM 2015), the entire 270-acre ROW for the Wildcat Loadout Facility occurs in a General Habitat Management Area (GHMA). GHMA are BLM-administered lands where some special management will apply to sustain Greater Sage-grouse populations, areas of occupied seasonal or year-round habitat outside of Priority Habitat Management Areas. Specifically, the ROW and surrounding GHMA is categorized as winter habitat per the Utah State University Kohl Model.[14] This habitat may provide connectivity with summer/nesting/winter habitat in Porphyry Bench, over three miles to the west. There are approximately 29,000,000 acres of GHMA identified in the State of Utah. Table A.-5 shows acres and miles of lands the Proposed Action would potentially impact within GHMA.

[14] *https://gis.blm.gov/utarcgis/rest/services/Wildlife/BLM_UT_GRSG_Seasonal_Habitats_Polygons/FeatureServer*

Table A-5: Lands Potentially Impacted Within GHMA

Lands potentially impacted within GHMA	Acres
Proposed Action	30 acres on previously disturbed lands
Already disturbed lands within the ROW	75 acres
Consumers Road on TLA lands	2 miles
Consumers Road on BLM outside of ROW	Less than $1/10^{th}$ of a mile
Railway to Martin Yard	1 mile

PFO biologists conducted a site visit in 2023 to the ROW and the adjacent lands (1/4-mile buffer) to the ROW. They chose this analysis area because there was no buffer identified in the ARMPA for GHMA, and it only specified occupied habitat, of which the closest occupied lek is over 18 miles to the north in the Emma Park Area. The biologists categorized the habitat within the ROW and buffer as previously disturbed or degraded and unsuitable because it is missing sage brush, forbs, and wet meadows which are habitat needs for Greater Sage-grouse either permanently or seasonally according to Table 2-2 in the ARMPA. For winter habitat there needs to be sagebrush greater than 10% of vegetative cover and greater than 10 inches in height for cover and food (BLM 2015). This necessary habitat was not present within the analysis area because of previous disturbance and previous and current grazing activities.

Based on observations and historical data, there are zero leks within this ROW and the surrounding area. Additionally, according to Utah Division of Wildlife Resources wildlife tracking data from GPS-radio collars on individual GRSG, there has not been any occurrences of GRSG within 5 miles of the 270-acre ROW. Because of this absence of GRSG at the existing Wildcat Loadout Facility, Consumers Road, and rail ROW between Wildcat Loadout Facility and Martin Yard impacts to GRSG are unlikely to occur.

The Proposed Action does include installation of tanks that are tall structures. For tall structures, the buffer distance in Appendix B of the 2015 ARMPA is within 2-miles of leks and for noise at least 0.25 miles from leks; there are no occupied leks within proximity to the ROW, the nearest lek is over 18 miles away.

The Proposed Action would place infrastructure in already disturbed locations and will incorporate the Design Feature (section 2.2.2.9) to equip tanks and other above-ground facilities with structures or devices that discourage nesting by raptors or corvids, which prey upon sage-grouse. Because of the lack of suitable habitat, lack of documented individuals and populations, and incorporation of design features to minimize any potential impacts, detailed analysis is not needed.

Animal strikes and noise and light impacts from traffic and trains are addressed sections 3.4 and 3.5).

B. APPENDIX B – UINTA BASIN PRODUCTION AND EXPORT CAPACITY

Utah Crude Oil Production and Uinta Basin Crude Oil Pricing

In Utah, oil drilling operations and producing wells are concentrated in the Uinta Basin in northeastern Utah and the Paradox Basin of southeastern Utah. Utah's crude oil production declined in 2020 following the drop in petroleum demand and oil prices during the COVID-19 pandemic. Production bottomed out at 69,600 barrels per day in May 2020, but steadily increased and then surpassed pre-pandemic levels in 2021 and 2022, hitting a record high of 136,500 barrels per day in October 2022. The state's crude oil production recovered and in 2023 reached a new high of 56 million bbls (approximately 153,000 bbls per day), a 24% increase from 2022 (57% higher than 2021), mostly attributable to drilling of the oil-rich Green River Formation in the Uinta Basin with new horizontal drilling (2-mile-long laterals) and advanced hydraulic fracturing techniques, leading to a new record-highs (EIA 2024). As of February of 2025, crude oil production in the State of Utah reached 182,000 bbls per day or approximately 66 million bbls per year (EIA 2024). With the growth in production, estimated exports of Utah crude oil nearly doubled to 12.3 million barrels (in 2022), mostly related to more Uinta Basin crude oil heading to the Gulf Coast via trains that are loaded in Carbon County.

Uinta Basin crude oil has historically sold at a discount to the national benchmark, West Texas Intermediate (WTI); in 2022 and 2023 this discount was 13%. This lower price was the result of the waxy nature of the basin’s oil which requires heating and special treatment in refining, the transportation distance, and the market being limited to Salt Lake City refineries. However, currently, about 30%–40% of Uinta Basin waxy crude gets transported to the Gulf Coast via train and can sometimes command a premium price compared to WTI because of its preferential properties. (EIA 2024).

Salt Lake City Refinery Capacity:

Utah's five oil refineries, all located in the Salt Lake City area, process about 207,000 barrels of crude oil per calendar day (208,714 as of May 15, 2025, EIA 2024). Much of the oil processed by the refineries arrives by pipeline from Utah, Colorado, Wyoming, and Canada. Pipelines carry refined products from the refineries to markets in Utah, Idaho, Nevada, Wyoming, eastern Washington, and Oregon. The five oil refineries are not all equipped to handle Uinta Basin waxy crude oils which may be processed into high value refined products, but the refineries that run it need relatively sophisticated (higher complexity) processing equipment in order to extract that potential (SCIC 2017). This limits the refining capacity of the waxy crude oil to 80,000 bbls per day in the SLC refineries.

Carbon County Transloading Capacity:

Beginning in 2013, to respond to production and the lack of refining capacity, three transloading sites began transferring crude oil from trucks to railway cars. Crude oil is trucked to the transload sites from numerous oil wells, some in central Utah and the majority in the Uinta Basin. The crude oil transloaded to train cars on Utah Railway (Utah Rails) and then is transported to Gulf Coast refineries which have the capacity needed to process the waxy crude. The existing, proposed, and approved transloading sites are as follows:

- The existing Price River Terminal (the former Wellington Coal Wash Plant) is currently permitted by Utah State Department of Air Quality to transload 120,000 bbls a day through storage tanks, and 10,000 bbls transloading through mobile operations (truck to railcar)[15].
- The existing Savage Terminal (formerly C.V. Spur) is currently permitted by Utah State Department of Air Quality to transload 30,000 bbls per day[16]. The Utah State Department of Air Quality approved their request to increase their daily thruput to 80,000 bbls per day[17].
- The existing Wildcat Loadout currently transloads 20,000 bbls per day. The Utah State Department of Air Quality approved their request to increase daily thruput to 100,000 bbls per day.
- The approved Utah Candle Company, LLC facility being constructed on TLA lands near the existing Wildcat Loadout Facility will have 80,000 bbls per day capacity if the Wildcat Loadout's ROW modification request is denied by the BLM. The company has broken ground at the alternate location but has not yet installed equipment.
- The proposed UB Railway's NEPA was recently upheld by the Supreme Court, clearing the way for Surface Transportation Board, Forest Service and Bureau of Indian Affairs to reissue to permits[18]. It is anticipated to transport crude oil volumes ranging from 130,000 to 350,000 barrels per day. This facility is not yet constructed.

This makes the current transloading capacity within Carbon County 180,000 bbls per day, with additional capacity approved and additional facilities pending. It is unknown how many bbls per day each of the transloading facilities are actually transloading.

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15 *https://daqpermitting.utah.gov/DocViewer?IntDocID=154025&contentType=application/pdf#:~:text=The%20storage%20tank%20has%20a,transloaded%20through%20mobile%20operations%20daily.&text=The%20emissions%20listed%20below%20are,rounding%20of%20emissions%20is%20possible.&text=II.,noted%20for%20informational%20purposes%20only*

16 *https://daqpermitting.utah.gov/NOI_Pub_H*

17 *https://daqpermitting.utah.gov/NOI_Pub_H*

18 *https://uintabasinrailway.com/docs/Supreme_Court_Clears_Path_for_Uinta_Basin_Railway.pdf*