

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

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**DOI-BLM-MT-C020-2017-0081-EA**

**Denbury Green Pipeline-MT, LLC, Denbury Onshore, LLC**  
Cedar Creek Anticline CO<sub>2</sub> Pipeline and EOR Development Project

**Location:** Powder River County, Carter County,  
Fallon County, Montana (MT)

## Scoping Report

U.S. Department of the Interior  
Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, MT 59301  
Phone: 406-233-2800  
FAX: 406-233-2921



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## **INTRODUCTION**

Denbury Green Pipeline-MT, LLC and Denbury Onshore, LLC, collectively referred to as Denbury, submitted two Plans of Development (POD) to the Bureau of Land Management (BLM) Miles City Field Office on December 18, 2015. The two PODs submitted by Denbury are a 110-mile carbon dioxide (CO<sub>2</sub>) delivery pipeline, and an upgrade to an existing oil field. Under the National Environmental Policy Act (NEPA) of 1969, the BLM is responsible for preparing the environmental assessment (EA) for the proposed projects. One of the first steps in the EA development, is to begin a scoping process. The objective of the scoping process is to identify all possible concerns or issues involved with the project from the perspective of the public stakeholders. For this project, the public scoping period was October 5, 2017 to November 3, 2017. Responses received during the scoping period were analyzed for statements of support and concern, and then considered and discussed for possible impacts to the project. Those concerns that warrant analysis will be addressed by topic within the EA.

## **PROJECT DESCRIPTION**

Denbury proposes to install and operate a 110-mile carbon dioxide (CO<sub>2</sub>) delivery pipeline (Pipeline). The 20-inch pipeline would transport CO<sub>2</sub> from the existing Bell Creek Enhanced Oil Recovery (BCEOR) field located in Powder River County, Montana northeast through Carter County to the Cedar Creek Anticline (CCA) oil field in Fallon County (Figure 1). This pipeline would transport the CO<sub>2</sub> necessary for the Enhanced Oil Recovery (EOR) process in the Cedar Creek Anticline Enhanced Oil Recovery field (CCAEOOR). Denbury proposes to upgrade and operate an existing 44,490-acre EOR project within Fallon County, which will connect to the proposed pipeline. The CCAEOOR consists of three existing units, which Denbury proposes to develop in a multiple phased approach. Existing infrastructure within the CCAEOOR field would be utilized when practicable. New wells are planned as either grass root wells or replacement wells.

Because of the connected nature of the two proposed actions, both the CCAEOOR field and proposed 110-mile-long CO<sub>2</sub> delivery pipeline are the focus of the scoping report. Due to various factors associated with the CCAEOOR field, additional analysis may be conducted on planned infrastructure on a site-specific basis. If warranted, additional analysis would occur during the Application for Permit to Drill (APD) process for that facility.

## **IMPLEMENTATION OF SCOPING PROCESS**

A 30-day public scoping period was initiated on October 5, 2017, with the posting of the proposed project and associated maps to the BLM ePlanning website <https://eplanning.blm.gov>, with NEPA number DOI-BLM-MT-C020-2017-0081-EA. In addition to the website notification, external scoping letters were sent, a Facebook post was made, and a news release was posted. During the comment period, a public meeting was held in Ekalaka, MT on October 25, 2017 which was open to all public. The letters seeking comments on the proposed action were sent on October 4, 2017 to the recipients identified in Appendix B. The Facebook post on October 17, 2017 and the news release in the Billings Gazette on October 4, 2017, requesting comments, can be found in Appendix A. The public was encouraged to respond via the e-Planning website, by mail, or with hand delivery to the BLM Miles City Field Office.

## **RESULTS OF THE SCOPING PROCESS**

A range of topics were raised during the external scoping process. The stakeholders are private land owners, county, state or federal agency representatives, and tribal representatives. The majority of respondents

expressed support for the proposed project. See Table 1 for additional information on project topics of concern.

### **Comments from the Public**

The results of external scoping from public stakeholders have determined multiple issues of concern, which can be found in Table 1 and letters in Appendix E.

### **Local, State and Federal Agency Comments**

During the external scoping process, 9 responses were received from local, state or federal government agencies about the proposed projects (Appendix D). Multiple county commissioners responded in support representing Dawson, Wibaux, Carter, Prairie, and Rosebud Counties. In addition, the Montana Department of Natural Resources and Conservation responded with support. Finally, Montana Department of Transportation and the United States Fish and Wildlife Service (USFWS) responded with a letter as well as listing areas of concern.

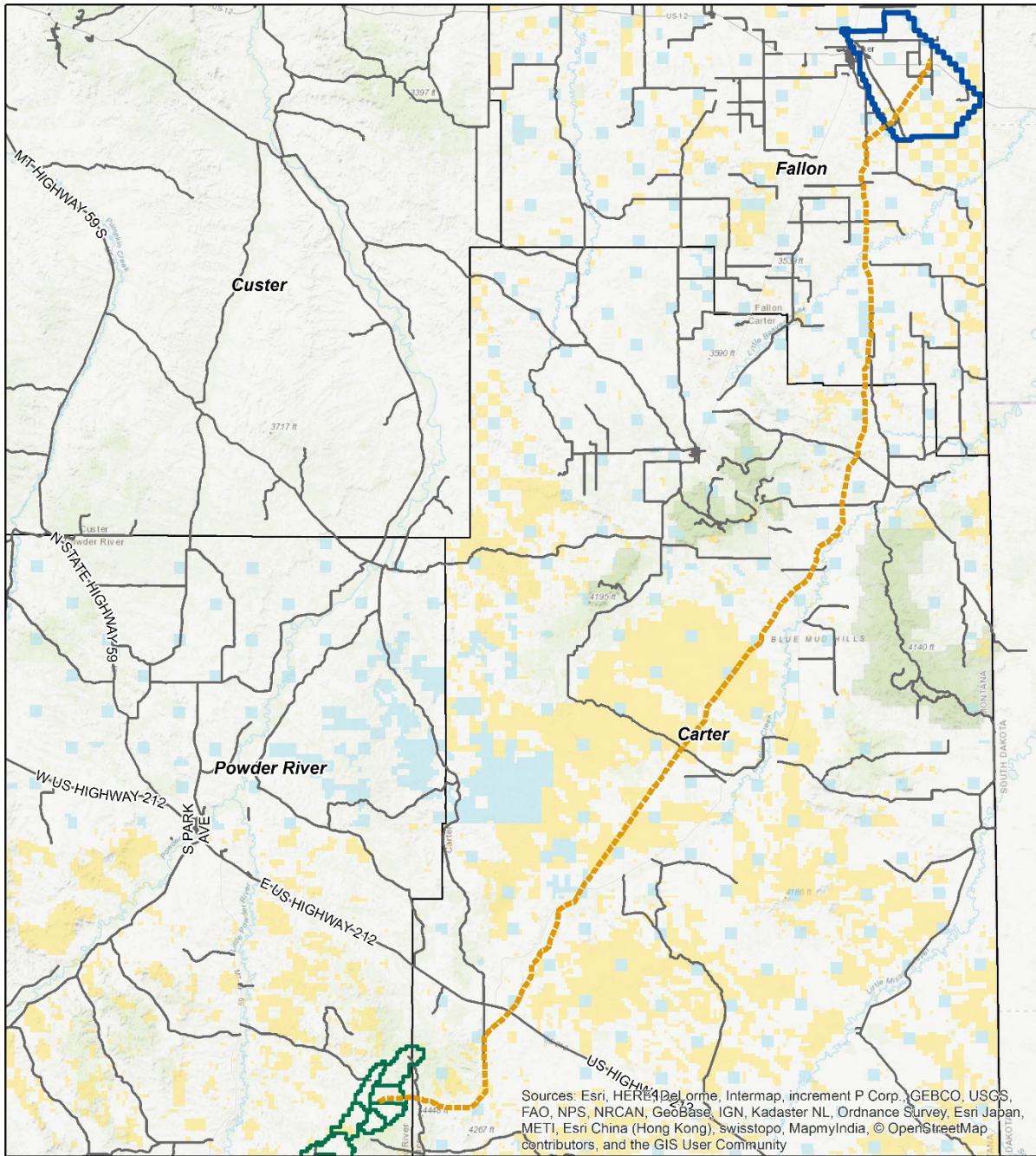
The USFWS stated that although there are threatened and endangered species that are documented to possibly be present within the project area, “no proposed species, candidate species, or proposed or designated critical habitats occur in the Project area counties.” In addition, the Montana Department of Transportation expressed concerns about maintenance of Right-of-Ways. Issues of concern are explained in Table 1 and original letters in Appendix D.

### **Tribal Consultation**


The BLM did not receive comments from the 17 consulting Tribes which received scoping letters regarding issues, concerns, and recommendations related to the Proposed Project. The BLM invited Tribal Chairmen and Traditional Historic Properties Officers to an Inter-Tribal Consultation meeting on November 1-2, 2017 in Billings, Montana. The following items were discussed: the proposed projects, Tribal concerns, and site visits.

### **Methodology and Summary of Comments Received**

Each response letter was analyzed for the type of stakeholder, the disposition of the respondent, and concerns referenced within the letter/website comment. Each concern was listed and summarized within this scoping report and Table 1 at the end of this document.




Prepared for:



Prepared by:

**Rocky Mountain Energy Solutions, Inc.**



2665 Aviation Dr.  
Sheridan, Wyoming  
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**Legend**





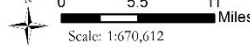
-  Bell Creek to CCA Pipeline
-  CCA LOR Field Development Boundary
-  Bell Creek Field Boundary
-  Road

Figure 1-1  
Cedar Creek Anticline Pipeline

 <p>Scale: 1:670,612</p>			
Datum	NAD 83	Zone	13
Projection	UTM		
Created by	K. Beck		
Date	11/29/2017		

T:\\_Mapping\Wyoming\Clients\Denbury\Denbury\_CCA\PipelineMap\_8.5x11.mxd

**Figure 1- Location Map**

**Table 1- Summary of Scoping Comments by Topic Area**

Topic	Comment Summary
Bald (Golden) Eagle	Operator must comply with parameters described within the 2010 Montana Bald Eagle Management Guidelines: An Addendum to Montana Bald Eagle Management Plan (1994) and the USFWS May 2007, National Bald Eagle Management Guidelines.
Carbon Emissions	A respondent expressed concerned that the utilization of carbon dioxide, and actions involving it, will increase carbon emissions in the area. Therefore, they would like an “assessment of how much carbon this proposed project is going to release, per barrel of oil produced, relative to other projects. If we are going to minimize the impact of our fossil fuel use, the public does need to know the relative carbon emissions of different projects.”
CO <sub>2</sub> Management	A respondent expressed concern regarding CO <sub>2</sub> reaching other producible formations which may impact storage and production. The respondent requests the following actions to address the concerns: Cooperation among field operators, well evaluation, mechanical integrity testing, well logging, leak detection and monitoring wells. The wells in the risk management plan must include wells used for injection, all production and monitoring wells, and all wells that penetrate any formation in which CO <sub>2</sub> is injected. In addition, “all possible conduits of CO <sub>2</sub> flow must be evaluated, including geological faulting and the possibility of behind casing flow. Containment of the injected CO <sub>2</sub> and all other reservoir fluids is paramount in the success of this or any EOR project.” A respondent expressed concerns about CO <sub>2</sub> possibly leaking from the pipeline, as well as the Baker oilfield. They expressed concern that “an aging oilfield that has been fracked and drilled many times is not anywhere close to the best of circumstances. I would like to see some evidence the carbon dioxide will stay where Denbury puts it.”
Energy Return on Investment	A respondent believes that the BLM should calculate an Energy Return on Investment (EROI) for every energy project and make the number for the Baker oilfield and proposed project public as well. they indicate that “it provides a common denominator that would enable good energy policy decisions, making possible a comparison not only between different fossil fuel sources but with renewable energy sources as well.”
Global Warming & Environmental Impact	A respondent expresses strong concern regarding the interaction of CO <sub>2</sub> and global warming. Regarding the proposed pipeline, they state “I’m wondering mostly how much it will contribute to global warming. That seems evident since Denbury will be using carbon dioxide, the primary greenhouse gas.” The respondent states that they are also concerned about changing weather patterns and harm to food production as direct impacts of the global warming in the county.
Greater Sage-Grouse	Identify what extent the Core, General, Priority and Restoration Habitat Management Areas are impacted by the project and discuss avoidance and mitigation measures accordingly.

Migratory Birds	Recommend that the operator develop a Migratory Bird Conservation Plan Operator should follow the Avian Power Line Interaction Committee (APLIC): 2006 Suggested Practices for Avian Protection on Power Lines and Reducing Avian Collisions with Power Lines: The State of the Art in 2012
Other Comments	Develop and implement a restoration plan for the Project area, including road, trail and land restoration Address erosion and sediment control Develop and follow best management practices for the control and minimization of noxious weeds and exotic plants Address and manage sensitive resources Directional boring under wetlands or streams must be engineered to prevent scour or other causes of exposure
ROW Maintenance	The respondent expressed concern regarding the possible encroachment into Montana Department of Transportation facilities or right-of-way. "Without prior approval, the developer may be required to remove/repair all improvements or impacts at their own expense."
Safety	A respondent is concerned about safety involving the pipeline project.
Section 7	Section 7 consultation if evaluation determines it may affect a listed species or critical habitat, specifically Northern long-eared bat.
Wetlands and Streams	Wetland delineation must be in accordance with U.S. Army Corps of Engineers procedures and requirements

## **Appendix A- Press Releases and Notifications**





Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold, from public view, your personal identifying information, we cannot guarantee that we will be able to do so. All submissions from organizations, from businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be available for public review.

In addition, the BLM will hold a public scoping meeting at the Ekalaka Event Center, 209 Speelmon West, Ekalaka, Montana on Wednesday, October 25, 2017 from 4:00 P.M. – 6:00 P.M. At the meeting, the BLM will present the review process and Denbury Resources, Inc. will present the proposals. After these presentations, MCFO staff members will be available to the public. The public will have the opportunity to submit their comments in writing during the meeting.

After the scoping period, an EA will be prepared to analyze the proposals. BLM plans to have this EA available for a public comment period sometime in the summer of 2018. The EA will be posted on the BLM e-Planning website at <https://eplanning.blm.gov> by conducting a “*Text Search*” for NEPA number DOI-BLM-MT-C020-2017-0081-EA.

Please contact, Irma Nansel, Planning and Environmental Coordinator, at (406) 233-3653 with questions. We appreciate your attention and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd D. Yeager". The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd D. Yeager  
Field Manager



For Immediate Release – October 4, 2017  
Contact: Mark Jacobsen, 406-233-2831, [mjacobse@blm.gov](mailto:mjacobse@blm.gov)

## **BLM opens public scoping for CO2 Pipeline and Enhanced Oil Recovery Project**

(MILES CITY, Mont.) –The Bureau of Land Management has opened a public scoping period for an environmental assessment that will address two plans of development submitted by Denbury Resources, Inc., to conduct an enhanced oil recovery project in the Cedar Creek Anticline and install a 110-mile 20-inch pipeline from the Bell Creek Oil Field to the Cedar Creek Anticline Oil Field within the Miles City Field Office.

The 30-day comment period will end on Nov. 3, 2017.

The Trump administration’s America First Energy Plan is an all-of-the-above strategy that supports working landscapes across the West. Secretary Ryan Zinke is committed to facilitating opportunities for responsible energy development that creates jobs and helps local communities grow.

A public meeting is scheduled to provide information and gather comments and will be held on Oct. 25, 2017 from 4 to 6 p.m. in Ekalaka at the Ekalaka Event Center located at [209 Speelmon West](#).

The environmental assessment will address the potential impacts of the two proposals. Project details and maps are available on the BLM e-Planning website at: <https://eplanning.blm.gov> by conducting a “*Text Search*” for the project NEPA number DOI-BLM-MT-C020-2017-0081-EA.

This public scoping process is intended to solicit input on issues, impacts and potential alternatives that the BLM will address in an upcoming NEPA document. The public is welcome to contribute comments regarding these proposals by one of the following methods:

Electronic: BLM e-Planning website at: <https://eplanning.blm.gov>  
Search for NEPA number DOI-BLM-MT-C020-2017-0081-EA  
Click “*Documents*” on left column  
Click “*Comment on Document*”

Mail: Miles City Field Office  
Attention: Irma Nansel  
[111 Garryowen Road](#)  
Miles City, MT 59301-7000

Those who provide comments are advised that before including their address, phone number, e-mail address, or other personal identifying information, they should be aware that the entire comment –

including the personal identifying information – may be made publicly available at any time. While those commenting can ask in their comments to withhold personal identifying information from public review, the BLM cannot guarantee that they will be able to do so.

For more information, contact the BLM Miles City Field Office at (406) 233-2800.

**Post to Facebook by BLM on October 17, 2017:**

The BLM is seeking public comments on an environmental assessment for a CO2 pipeline and enhanced oil recovery project proposed by Denbury Resources. The 30-day comment period ends on Nov. 3 and a public meeting will be held on Oct. 25 from 4 to 6 p.m. in Ekalaka at the Ekalaka Event Center at [209 Speelmon](#). For more info on the proposal and how to comment on the environmental assessment go to the BLM e-Planning website at: <https://eplanning.blm.gov> and do a “Text Search” for the project NEPA number DOI-BLM-MT-C020-2017-0081-EA.

**Appendix B- Mailing List for Scoping Period**

## Mailing List for News Release

Agri News <[editor@imt.net](mailto:editor@imt.net)>,  
"Associated Press (Montana)" <[apmontana@ap.org](mailto:apmontana@ap.org)>,  
Big Horn County News <[news@bighorncountynews.com](mailto:news@bighorncountynews.com)>,  
Billings Gazette <[news@billingsgazette.com](mailto:news@billingsgazette.com)>,  
Billings Outpost <[editor@billingsnews.com](mailto:editor@billingsnews.com)>,  
Brett French <[BFrench@billingsgazette.com](mailto:BFrench@billingsgazette.com)>,  
Carol Klinker <[cklinker@rangeweb.net](mailto:cklinker@rangeweb.net)>,  
Circle Banner <[banner@midrivers.com](mailto:banner@midrivers.com)>,  
Clair Johnson <[cjohnson@billingsgazette.com](mailto:cjohnson@billingsgazette.com)>,  
Ekalaka Eagle <[ekeagle@midrivers.com](mailto:ekeagle@midrivers.com)>,  
Ernest Scheyder <[Ernest.Scheyder@thomsonreuters.com](mailto:Ernest.Scheyder@thomsonreuters.com)>,  
Fallon County Times <[fctimes@midrivers.com](mailto:fctimes@midrivers.com)>,  
Forsyth Independent <[ip-news@rangeweb.net](mailto:ip-news@rangeweb.net)>,  
Glendive Ranger Review <[rrnews@rangerreview.com](mailto:rrnews@rangerreview.com)>,  
Jordan Tribune <[tradewind@midrivers.com](mailto:tradewind@midrivers.com)>,  
"KTVQ TV (Billings)" <[news@ktvq.com](mailto:news@ktvq.com)>,  
"KULR 8 TV (Billings)" <[news@kulr.com](mailto:news@kulr.com)>,  
"KXGN & KDZN Radio (Glendive)" <[newsdesk@kxgn.com](mailto:newsdesk@kxgn.com)>,  
Laura Lundquist <[montontheground@gmail.com](mailto:montontheground@gmail.com)>,  
Matt Brown <[mbrown@ap.org](mailto:mbrown@ap.org)>,  
Mike Ellerd <[mellerd.pnb@gmail.com](mailto:mellerd.pnb@gmail.com)>,  
Mike Ferguson <[mferguson@billingsgazette.com](mailto:mferguson@billingsgazette.com)>,  
Miles City Star <[mcreporter@midrivers.com](mailto:mcreporter@midrivers.com)>,  
Montana Public Radio <[news@mtp.r.org](mailto:news@mtp.r.org)>,  
Noelle Straub <[editorial@eenews.net](mailto:editorial@eenews.net)>,  
Northern Ag Network <[newsdesk@northernbroadcasting.com](mailto:newsdesk@northernbroadcasting.com)>,  
Powder River Examiner <[prexaminer@rangeweb.net](mailto:prexaminer@rangeweb.net)>,  
Sidney Herald <[editor@sidneyherald.com](mailto:editor@sidneyherald.com)>,  
Steve Prosinski <[citynews@billingsgazette.com](mailto:citynews@billingsgazette.com)>,  
terry tribune <[tribune@midrivers.com](mailto:tribune@midrivers.com)>,  
victoria fregoso <[vfregoso@ktvq.com](mailto:vfregoso@ktvq.com)>,  
Western Livestock Reporter <[wlrpubs@imt.net](mailto:wlrpubs@imt.net)>,  
Wibaux Pioneer Gazette <[wibaux@midrivers.com](mailto:wibaux@midrivers.com)>,

## BLM--RAC

<u>L Name</u>	<u>F Name</u>	<u>Addr 1</u>	<u>Addr 2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Line	Lucas	6061 Hwy 59 South		Miles City	MT	59301
Kalfell	Lance	42 Montana Road		Terry	MT	59349
Pilster	Larry	55 Pilster Dr		Alzada	MT	59311
Kary	Doug	415 West Wicks Lane		Billings	MT	59105
Cumin	Calvin	9433 Hwy 87		Shepherd	MT	59079
Harding	Rita	Box 30324		Billings	MT	59107
Hanson	Steven	P.O. Box 1021		Red Lodge	MT	59068
Olson	Jennifer	P.O. Box 424		Broadus	MT	59317
Sackman	Sharla	P.O. Box 422		Terry	MT	59349



## Congressional Offices

<u>Title</u>	<u>L Name</u>	<u>F Name</u>	<u>Addr 1</u>	<u>Addr 2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Senator	Daines	Steve	222 North 32 <sup>nd</sup> Street	Suite 100	Billings	MT	59101
Congressman	Gianforte	Greg	222 North 32 <sup>nd</sup> Street	Suite 900	Billings	MT	59101
Senator	Tester	Jon	2900 4 <sup>th</sup> Avenue North	Suite 201	Billings	MT	59101

## Federal Agencies

<u>L_Name</u>	<u>F_Name</u>	<u>Agency</u>	<u>Addr_1</u>	<u>Addr_2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Bush	Jodi	US Fish & Wildlife Service	2900 4th Ave North	Room 301	Billings	MT	59101
Johnson	Shannon	US Fish & Wildlife Service	Division of Ecological Services	585 Shepard Way	Helena	MT	59601-6287
McMuriy	Darin	U.S. Army Corps of Engineers	P.O. Box 2256		Billings	NT	59103
DalSoglio	Julie	Fort Peck Amy Corps of Engineers	P.O. Box 208		Fort Peck	MT	59223
Platt	Amelia	EPA Montana Operations Office-Fed Ofc Bldg	10 West 15th Street	Suite 3200	Helena	MT	59626
		EPA Region 8 NEPA Program (8EPR-N)	1595 Wynkoop Street		Denver	CO	80202

## Interest Groups

<u>L_Name</u>	<u>F_Name</u>	<u>Agency</u>	<u>Addr_1</u>	<u>Addr_2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
		Montana Wildlife Federation	P O Box 1175		Helena	MT	59624-1175
France	Tom	National Wildlife Federation	240 North Higgins	Suite 2	Missoula	MT	59802
		Citizens For Resource Development	P.O. Box 565		Broadus	MT	59317
Justio	Chere	Montana Preservation Alliance	120 Reeder's Alley		Helena	MT	59601
Penfold	Mike	Frontier Heritage Alliance	P.O. Box 27		Buffalo	WY	82834
Wiley	Dan	Lewis and Clark National Historic Trail	National Park Service	601 Riverfront Dr.	Omaha	NE	68102-4226
Nelson	Denise	Lewis and Clark National Historic Trail	National Park Service	601 Riverfront Dr.	Omaha	NE	68102-4226
Hatcher	Lindy	LCTHF Executive Director	P.O. Box 3434		Great Falls	MT	59403
		Powder River Basin Resource Council	934 North Main St		Sheridan	WY	82801
Clinch	Bud	Montana Coal Council	2301 Colonial Dr.		Helena	MT	59601
Hernandez	Shilo	Western Environmental Law Center	103 Reeder's Alley		Helena	MT	59601
		Montana Environmental Information Center	P.O. Box 1184		Helena	MT	59624
Newman	Svein	Northern Plains Resource Council	220 South 27th Street	Suite A	Billings	MT	59101
Johnson	Tammy	Montana Mining Association	P.O. Box 1026		Whitehall	MT	59759
Deitchman	Carl	MT Wilderness Assoc- Eastern Wildlands Chptr	80 South Warren St		Helena	MT	59601
Ekey	Bob	Montana Wilderness Society	503 W. Mendenhall		Bozeman	MT	59715
Homme	Al	Montana Wildlife Federation	910 S Strevell		Miles City	MT	59301
Cole	Mack	Montanans for Responsible Energy Dvlpmnt	511 Pleasant St		Miles City	MT	59301
Metropoulos	Jon	MT Assoc of Oil, Gas and Coal Counties	One South Montana	Suite L-3	Helena	MT	59601
Birdinground	Wilford	Natural Resource Conservation Service	P.O. Box 330		Lame Deer	MT	59043
Williams	Jaimie	Nature Conservancy of Montana	32 S Ewing	Suite 215	Helena	MT	59601
Dixon	Bev	The Wildlife Society	2110 South Tracy		Bozeman	MT	59715
Haight	Adam	Northern Plains Resource Council	220 South 27 <sup>th</sup> Street	Suite A	Billings	MT	59101

## Landowners Permittees

Owner Name	Owner Address	Owner City	State	Zip Code	Location
4J WELL SERVICE INC	PO BOX 72	BAKER	MT	59313-0901	CCA Surface Owners/South Pennel
AFRANK LESLIE A ET AL	PO BOX 1076	BAKER	MT	59313-1076	CCA Surface Owners/Coral Creek
ARNELL ELLA ET AL	PO BOX 183	BAKER	MT	59313-0183	CCA Surface Owners/South Pennel
ASKIN RODNEY & MARILYN	PO BOX 893	BAKER	MT	59313-0893	CCA Surface Owners/South Pennel
ATKINS JAMES R & CYNTHIA L	PO BOX 162	BAKER	MT	59313-0162	CCA Surface Owners/South Pennel
BAKER METAL AND RECYCLING INC	PO BOX 542	BAKER	MT	59313-0542	CCA Surface Owners/South Pennel
BALTZ STEPHEN P ET AL	PO BOX 754	GRAND LAKE	CO	80447-0754	CCA Surface Owners/South Pennel
BARTH ALLAN AND PATRICIA	PO BOX 1514	BAKER	MT	59313-1514	CCA Surface Owners/South Pennel
BARTH RENTALS LLC	PO BOX 1514	BAKER	MT	59313-1514	CCA Surface Owners/South Pennel
BEAN PROPERTIES LLC	3402 BRISBIN ST	MILES CITY	MT	59301-5788	CCA Surface Owners/South Pennel
BECKER JAMES JOSEPH ET AL	208 E TIMOTHY ST	GILLETTE	WY	82718-5868	CCA Surface Owners/South Pennel
BETTENHAUSEN SHANE	PO BOX 396	BAKER	MT	59313-0396	CCA Surface Owners/South Pennel
BNSF RAILWAY COMPANY	PO BOX 666	BAKER	MT	59313-0666	CCA Surface Owners/South Pennel
BONDELL SHEILA ET AL	PO BOX 1298	BAKER	MT	59313-1298	CCA Surface Owners/South Pennel
BRAUN KEVIN J	PO BOX 707	BAKER	MT	59313-0707	CCA Surface Owners/ELOB
BRAUN KEVIN J & MARIA	PO BOX 707	BAKER	MT	59313-0707	CCA Surface Owners/ELOB
BRAUN LINDA	5415 W 17TH N	IDAHO FALLS	ID	83402-5355	CCA Surface Owners/ELOB
BREWER JOHN I	PO BOX 165	BAKER	MT	59313-0165	CCA Surface Owners/South Pennel
BRUCE GARY AND RUBY	PO BOX 614	BAKER	MT	59313-0614	CCA Surface Owners/South Pennel
BURNS DAPHNE MAY ET AL	PO BOX 1629	STANWOOD	WA	98292-1629	CCA Surface Owners/South Pennel
C & D CATTLE COMPANY	PO BOX 539	BAKER	MT	59313-0539	CCA Surface Owners/South Pennel
CHAPMAN JONATHON M ET AL	PO BOX 298	BAKER	MT	59313-0298	CCA Surface Owners/South Pennel
CITY OF BAKER	PO BOX 1512	BAKER	MT	59313-1512	CCA Surface Owners/South Pennel
CLASSIC RENTALS LLC	PO BOX 1193	BAKER	MT	59313-1193	CCA Surface Owners/South Pennel
CONROY KIRK J & ROCHELLE	PO BOX 875	BAKER	MT	59313-9802	CCA Surface Owners/ELOB
CONTINENTAL RESOURCES INC	PO BOX 269000	OKLAHOMA CITY	OK	73126-9000	CCA Surface Owners/South Pennel
COUNTRY CROSS RANCH LLC	PO BOX 388	GLENDIVE	MT	59330-0388	CCA Surface Owners/South Pennel
COX DANIEL F	324 N CROW AVE	HARDIN	MT	59034-1912	CCA Surface Owners/South Pennel
CRAWFORD CHRISTOPHER O AND JANAE A	PO BOX 829	BAKER	MT	59313-0829	CCA Surface Owners/ELOB
CRAWFORD DAVID J ET AL	PO BOX 938	BAKER	MT	59313-0938	CCA Surface Owners/South Pennel
CROW ROBERT A ET AL	PO BOX 841	BAKER	MT	59313-0841	CCA Surface Owners/South Pennel
CUMBER RITCHIE	PO BOX 704	BAKER	MT	59313-0704	CCA Surface Owners/South Pennel
CUPPY JOSHUA W AND KIMBERLY A	PO BOX 518	BAKER	MT	59313-0518	CCA Surface Owners/South Pennel
D & D OILFIELD SERVICE INC	PO BOX 482	BAKER	MT	59313-0482	CCA Surface Owners/South Pennel
D & M SOLUTIONS INC	PO BOX 848	BAKER	MT	59313-0848	CCA Surface Owners/South Pennel
DAK-TANA WIRELINE LLC	PO BOX 828	BAKER	MT	59313-0828	CCA Surface Owners/South Pennel
DBW INVESTMENT PROPERTIES LLC	PO BOX 772	BAKER	MT	59313-0772	CCA Surface Owners/South Pennel
DEGRAND ANGELA ET AL	PO BOX 341	BAKER	MT	59313-0341	CCA Surface Owners/South Pennel
DEGRAND ARTHUR AND KATHY L	PO BOX 937	BAKER	MT	59313-0937	CCA Surface Owners/South Pennel
DENBURY ONSHORE LLC	5320 LEGACY DRIVE	PLANO	TX	75024-3127	CCA Surface Owners/South Pennel
DUFFIELD BONITA M - TRUSTEE	1208 15TH AVE SW	WATFORD CITY	ND	58854-6809	CCA Surface Owners/ELOB
ENGESSER ROBERTA J	1423 LOOKOUT VALLEY CT	SPEARFISH	SD	57783-1551	CCA Surface Owners/South Pennel
FALLON COUNTY	PO BOX 846	BAKER	MT	59313-0846	CCA Surface Owners/South Pennel
FALLON COUNTY VETERINARY SERVICE PC	PO BOX 898	BAKER	MT	59313-0898	CCA Surface Owners/South Pennel
FALLON VILLAGE APARTMENTS LLC	3224 HIGHWAY 7	BAKER	MT	59313-9615	CCA Surface Owners/South Pennel
FARMERS UNION OIL COMPANY	PO BOX 1000	BAKER	MT	59313-1000	CCA Surface Owners/South Pennel
FISCHER BARBARA R	PO BOX 711	BAKER	MT	59313-0711	CCA Surface Owners/South Pennel
GERARD LYNNE V - TRUSTEE	1015 CONCORD CT	VISTA	CA	92081-8927	CCA Surface Owners/South Pennel
GOERNDT KELLY	PO BOX 173	BAKER	MT	59313-0173	CCA Surface Owners/South Pennel
GOODMAN H C	PO BOX 1057	BAKER	MT	59313-1057	CCA Surface Owners/South Pennel
GOODMAN HENRY C	PO BOX 1057	BAKER	MT	59313-1057	CCA Surface Owners/South Pennel
GORDER GARY AND PAM	PO BOX 728	BAKER	MT	59313-0728	CCA Surface Owners/South Pennel
GRAHAM CLAYTON AND MARY	PO BOX 164	BAKER	MT	59313-0164	CCA Surface Owners/South Pennel

## Landowners Permittees

GREAT FALLS HOLDINGS LLC	600 SOUTH MAIN	BUTTE	MT	59701	CCA Surface Owners/South Pennel
GREEN JANET	PO BOX 85	BAKER	MT	59313-0085	CCA Surface Owners/South Pennel
GRIFFITH DEVELOPMENT LLC	PO BOX 1193	BAKER	MT	59313-1193	CCA Surface Owners/South Pennel
GRIFFITH EXCAVATING INC	PO BOX 1193	BAKER	MT	59313-1193	CCA Surface Owners/South Pennel
GRIFFITH KENNETH W & KAREN R	PO BOX 1193	BAKER	MT	59313-1193	CCA Surface Owners/South Pennel
GRIFFITH MICHAEL R & BRANDI L	PO BOX 768	BAKER	MT	59313-0768	CCA Surface Owners/South Pennel
GUNDERSON MICHAEL J ET AL	3402 HIGHWAY 7	BAKER	MT	59313-9614	CCA Surface Owners/South Pennel
HADLEY JOHN C	PO BOX 132	MARMARTH	ND	58643-0132	CCA Surface Owners/Coral Gap
	81 ANTELOPE				
HALMANS HUBERTUS	LOOP	BAKER	MT	59313-9758	CCA Surface Owners/South Pennel
	83 ANTELOPE				
HALMANS JOHN J	LOOP	BAKER	MT	59313-9758	CCA Surface Owners/South Pennel
HALSTEAD JUDSON AND PATRICIA	PO BOX 523	BAKER	MT	59313-0523	CCA Surface Owners/South Pennel
HANRATTY WALTER J AND JEAN ET AL	PO BOX 211	BAKER	MT	59313-0211	CCA Surface Owners/ELOB
HARTSE MARION FAMILY TRUST	PO BOX 1175	BAKER	MT	59313-1175	CCA Surface Owners/South Pennel
	8510 105TH				
HAYDEN ANITA M	AVENUE	MCGREGOR	ND	58755	CCA Surface Owners/South Pennel
HECKER JOHN & MARY ANN	PO BOX 695	BAKER	MT	59313-0695	CCA Surface Owners/South Pennel
HEISER KELLY J & ANGELA K	PO BOX 483	BAKER	MT	59313-0483	CCA Surface Owners/South Pennel
HEYEN ROGER AND LORA	PO BOX 156	BAKER	MT	59313-0156	CCA Surface Owners/South Pennel
HICKEY BRETT D & BRIAN L	PO BOX 1228	BAKER	MT	59313-1228	CCA Surface Owners/South Pennel
HICKEY QUENTON D AND KRYSTAL D	PO BOX 401	BAKER	MT	59313-0401	CCA Surface Owners/South Pennel
HILLSIDE RANCH INC	5294 HIGHWAY 7	BAKER	MT	59313-9412	CCA Surface Owners/South Pennel
HINMAN DORIS	PO BOX 821	BAKER	MT	59313-0821	CCA Surface Owners/South Pennel
HOEGER RANDY S AND BRENDA L	PO BOX 793	BAKER	MT	59313-0793	CCA Surface Owners/South Pennel
HOLESHOT PROPERTIES LLC	PO BOX 273	BAKER	MT	59313-0273	CCA Surface Owners/South Pennel
HOYT TERRY & PATRICIA L	PO BOX 1163	BAKER	MT	59313-1163	CCA Surface Owners/ELOB
HUFFORD JAMES A & JUDY R	PO BOX 305	BAKER	MT	59313-0305	CCA Surface Owners/South Pennel
HUFT PHILIP R AND ANDREA N ET AL	PO BOX 871	BAKER	MT	59313-0871	CCA Surface Owners/South Pennel
	2027 S				
HYLAND GLEN ET AL	GRANDVIEW LN	BISMARCK	ND	58503-0852	CCA Surface Owners/South Pennel
J & M LUMBER LLC	PO BOX 406	BAKER	MT	59313-0406	CCA Surface Owners/South Pennel
JARDEE JOYCE A	PO BOX 1255	BAKER	MT	59313-1255	CCA Surface Owners/South Pennel
JENSEN TIMOTHY AND CAROL ELHARD	PO BOX 934	BAKER	MT	59313-0934	CCA Surface Owners/ELOB
JOYCE ROBERT NELSON ET AL	134 N CEDAR DR	KALISPELL	MT	59901-2954	CCA Surface Owners/Coral Creek
KAPPS OTIS AND MARY	PO BOX 171	BAKER	MT	59313-0171	CCA Surface Owners/South Pennel
KIRKWOOD OIL & GAS LLC	PO BOX 3439	CASPER	WY	82602-3439	CCA Surface Owners/South Pennel
	PO BOX 971				
KIRSCHTEN JAMES D RESIDURARY TRUST		BAKER	MT	59313-0971	CCA Surface Owners/South Pennel
KIRSCHTEN MARK R & DENA F ET AL	PO BOX 755	BAKER	MT	59313-0755	CCA Surface Owners/ELOB
KIRSCHTEN MICHAEL J	PO BOX 1131	BAKER	MT	59313-1131	CCA Surface Owners/South Pennel
KIRSCHTEN MIRIAM I	PO BOX 971	BAKER	MT	59313-0971	CCA Surface Owners/South Pennel
KONO DAVID B AND PENNY	PO BOX 1024	BAKER	MT	59313-1024	CCA Surface Owners/South Pennel
KONO JAMES D	PO BOX 1226	BAKER	MT	59313-1226	CCA Surface Owners/South Pennel
KRUGER ROBERT G AND KRISTINE P	PO BOX 1081	BAKER	MT	59313-1081	CCA Surface Owners/South Pennel
KRUGER ROBERT G AND KRISTINE P					
FAMILY TRUST	PO BOX 1081	BAKER	MT	59313-1081	CCA Surface Owners/South Pennel
LANG & SON INC	PO BOX 491	BAKER	MT	59313-0491	CCA Surface Owners/ELOB
LANTIS SHAWN D	PO BOX 611	BAKER	MT	59313-0611	CCA Surface Owners/South Pennel
LAWRENCE LAUREL ANN	1929 13TH ST NW	WASHINGTON	DC	20009-4432	CCA Surface Owners/South Pennel
LEICHT MARGARET E ET AL	18 ARCADE CIR	LAS VEGAS	NV	89110-1322	CCA Surface Owners/South Pennel
LEWIS SHIRLEY ET AL	13869 TRAVOIS TRL	HERMOSA	SD	57744-5015	CCA Surface Owners/South Pennel
LOSING JERRY R & JILL K WHITEMAN	PO BOX 681	BAKER	MT	59313-0681	CCA Surface Owners/South Pennel
LOVING HERMAN L & SYBEL	PO BOX 1064	BAKER	MT	59313-1064	CCA Surface Owners/South Pennel
MADSON JAMES L AND JANE G TRUST	208 GREEN LEA LN	ALBERT LEA	MN	56007-2120	CCA Surface Owners/South Pennel
MCDOWELL JOHN ET AL	PO BOX 1027	ABERDEEN	SD	57402-1027	CCA Surface Owners/South Pennel
MCELRONE SHEILA	PO BOX 992	BAKER	MT	59313-0992	CCA Surface Owners/South Pennel
MDU	PO BOX 5650	BISMARCK	ND	58506-5650	CCA Surface Owners/South Pennel

## Landowners Permittees

MELLON JERRY ET AL	PO BOX 174	PLEVNA	MT	59344	CCA Surface Owners/South Pannel
MIDWESTERN REALTY INVESTMENTS LLC	PO BOX 698	BAKER	MT	59313-0698	CCA Surface Owners/South Pannel
MILLER BRANDON AND ALEXISS	PO BOX 177	BAKER	MT	59313-0177	CCA Surface Owners/South Pannel
MILLER TRICIA L	PO BOX 1276	BAKER	MT	59313-1276	CCA Surface Owners/South Pannel
MITCHELLS CRANE AND TRUCKING LLC	PO BOX 1192	BAKER	MT	59313-1192	CCA Surface Owners/South Pannel
MOORE JOHN D ET AL	494 HIGHWAY 59 N	MILES CITY	MT	59301	CCA Surface Owners/ELOB
MOORE LEE AND LINDA	PO BOX 542	BAKER	MT	59313-0542	CCA Surface Owners/South Pannel
MOORE NEIL AND ASHLEE	PO BOX 14	BAKER	MT	59313-0014	CCA Surface Owners/South Pannel
MORRIS RANDY A AND DONNA L	PO BOX 733	BAKER	MT	59313-0733	CCA Surface Owners/South Pannel
MOSER JOHN D AND JANICE K	PO BOX 72	BAKER	MT	59313-0072	CCA Surface Owners/South Pannel
MOSS WADE AND CHRISTINE	PO BOX 878	BAKER	MT	59313-0878	CCA Surface Owners/South Pannel
NAPTON GARY R AND DONNA J	PO BOX 263	BAKER	MT	59313-0263	CCA Surface Owners/South Pannel
NEARY JAMES & EVELYN	PO BOX 641	BAKER	MT	59313-0641	CCA Surface Owners/South Pannel
NELSON MICHAEL J AND PAM	PO BOX 1304	BAKER	MT	59313-1304	CCA Surface Owners/South Pannel
NELSON ROBERT A	PO BOX 1102	BAKER	MT	59313-1102	CCA Surface Owners/South Pannel
NORTHSIDE TRUCK & AUTO CENTER INC	PO BOX 1526	BAKER	MT	59313-1526	CCA Surface Owners/South Pannel
O DONNELL CASEY THOMAS ET AL	PO BOX 507	BAKER	MT	59313-0507	CCA Surface Owners/ELOB
O DONNELL HERBERT ET AL	PO BOX 819	BAKER	MT	59313-0819	CCA Surface Owners/South Pannel
O DONNELL MICHAEL W & SHARON MAUVEE	PO BOX 127	BAKER	MT	59313-0127	CCA Surface Owners/ELOB
O DONNELL PATRICK & TAMMY	PO BOX 835	BAKER	MT	59313-0835	CCA Surface Owners/ELOB
OLIND GEORGE E AND BARBARA	PO BOX 104	BAKER	MT	59313-0104	CCA Surface Owners/South Pannel
OLSEN ANNE POULOS	PO BOX 662	BAKER	MT	59313-0662	CCA Surface Owners/South Pannel
ORCUTT DONALD R AND MARLA M WIMAN	PO BOX 791	BAKER	MT	59313-0791	CCA Surface Owners/South Pannel
	3449 CREEKWOOD				
ORROCK GEORGE K ET AL	DR SE	CONYERS	GA	30094-3523	CCA Surface Owners/South Pannel
OWENS THOMAS AND PAMELA	PO BOX 951	BAKER	MT	59313-0951	CCA Surface Owners/South Pannel
PANKRATZ LAURIE ET AL	PO BOX 410	BAKER	MT	59313-0410	CCA Surface Owners/South Pannel
PENTAGON PARTNERS LLC	1847 WEBSTER RD	BAKER	MT	59313-9719	CCA Surface Owners/South Pannel
PHEBUS DRURY G	PO BOX 901	BAKER	MT	59313-0901	CCA Surface Owners/South Pannel
PICKETT LARRY - MAIL TO	PO BOX 1056	BAKER	MT	59313-1056	CCA Surface Owners/South Pannel
PIESIK LORRAINE A	PO BOX 686	BAKER	MT	59313-0686	CCA Surface Owners/ELOB
PINNOW CRAIG & WANDA	PO BOX 39	BAKER	MT	59313-0039	CCA Surface Owners/Coral Creek
PINNOW CRAIG AND WANDA	PO BOX 39	BAKER	MT	59313-0039	CCA Surface Owners/Coral Gap
QUENZER DUANE E AND LUANA D	PO BOX 603	BAKER	MT	59313-0603	CCA Surface Owners/South Pannel
QUENZER GORDON	PO BOX 1133	FORSYTH	MT	59327-1133	CCA Surface Owners/South Pannel
QUENZER JAY & LORI	PO BOX 1312	BAKER	MT	59313-1312	CCA Surface Owners/South Pannel
RAMBUR PIERETTE & BRIAN	PO BOX 824	BAKER	MT	59313-0824	CCA Surface Owners/South Pannel
REETZ JAMES LEE	PO BOX 216	BAKER	MT	59313-0216	CCA Surface Owners/South Pannel
RICHMOND FLOYD ET AL	PO BOX 316	BAKER	MT	59313-0316	CCA Surface Owners/South Pannel
ROST CASEY K AND JEAN D	PO BOX 61	BAKER	MT	59313-0061	CCA Surface Owners/South Pannel
ROST CONSTRUCTION LLC	PO BOX 123	BAKER	MT	59313-0123	CCA Surface Owners/South Pannel
ROST JEREMY & TINA	PO BOX 485	BAKER	MT	59313-0485	CCA Surface Owners/South Pannel
RUSLEY TRUMAN GARY	1578 WEBSTER RD	BAKER	MT	59313-9739	CCA Surface Owners/Coral Gap
RUSTAD GORDON E JR & SHARON R	PO BOX 163	BAKER	MT	59313-0163	CCA Surface Owners/South Pannel
SANDER RENTALS LLC	PO BOX 109	BAKER	MT	59313-0109	CCA Surface Owners/South Pannel
SCHERMAN DAVID	PO BOX 297	BAKER	MT	59313-0297	CCA Surface Owners/South Pannel
SCHIESER KENNETH PHILLIP	18 SANTA ROSA AVE	SAUSALITO	CA	94965-2042	CCA Surface Owners/South Pannel
SCHWARTZ JOSH	PO BOX 105	BAKER	MT	59313-0105	CCA Surface Owners/South Pannel
SCHWEIGERT DALE AND BRENDA	4510 HIGHWAY 7 4982 E BENNETT	BAKER	MT	59313-9429	CCA Surface Owners/ELOB
SCHWENK LEONARD ET AL	BAY CT	COEUR D ALENE	ID	83814-7854	CCA Surface Owners/South Pannel
SEARS STEVE AND MARCI	PO BOX 683	BAKER	MT	59313-0683	CCA Surface Owners/South Pannel

## Landowners Permittees

SHIRTLIFF GLORIA J ET AL	2270 MISSION WAY N	KALISPELL	MT	59901-2227	CCA Surface Owners/South Pannel
SIEBER ARLENE G ET AL	2131 LAKEVIEW DR	YOUNG HARRIS	GA	30582-1907	CCA Surface Owners/South Pannel
SINGER LARRY J AND CYNTHIA J ET AL	PO BOX 514	BAKER	MT	59313-0514	CCA Surface Owners/South Pannel
SINGER ROBERT LEE ET AL	PO BOX 738	BAKER	MT	59313-0738	CCA Surface Owners/Coral Creek
SINGER ROGER R	PO BOX 1253	BAKER	MT	59313-1253	CCA Surface Owners/Coral Creek
SMITH LINDA BRAUN	5415 W 17TH N	IDAHO FALLS	ID	83402-5355	CCA Surface Owners/South Pannel
SONSALLA DONALD & MARGARET ET AL	PO BOX 192	MARMARTH	ND	58643-0192	CCA Surface Owners/Coral Gap
SONSALLA DONALD A & MARGARET L ET AL	PO BOX 51	MARMARTH	ND	58643-0051	CCA Surface Owners/Coral Gap
SONSALLA EUGENE P AND FRANCES I	PO BOX 924	BAKER	MT	59313-0924	CCA Surface Owners/ELOB
SPRIGGS STEVEN W AND BONITA K	PO BOX 975	BAKER	MT	59313-0975	CCA Surface Owners/South Pannel
SSD PROPERTIES LLC	PO BOX 613	BAKER	MT	59313-0613	CCA Surface Owners/South Pannel
STANDARD CLIFFORD & RENNEE	104 ROLLING HILLS TRL	BAKER	MT	59313-9756	CCA Surface Owners/ELOB
STATE OF MONTANA	1625 11TH AVE	HELENA	MT	59601-4600	CCA Surface Owners/South Pannel
STEFFES LARRY AND CARMIE	PO BOX 195	PLEVNA	MT	59344-0195	CCA Surface Owners/South Pannel
STEVENSON JON	1497 11TH ST W	DICKINSON	ND	58601-3676	CCA Surface Owners/South Pannel
THILMONY RANDY & SHEILA	PO BOX 792	BAKER	MT	59313-0792	CCA Surface Owners/South Pannel
TRI STATE SERVICES OF BAKER LLC	PO BOX 1095	BAKER	MT	59313-1095	CCA Surface Owners/South Pannel
TWEDT DENNIS L & STEPHANIE E	PO BOX 534	BAKER	MT	59313-0534	CCA Surface Owners/South Pannel
USDI - BUREAU OF LAND MANAGEMENT	PO BOX 36800	BILLINGS	MT	59107-6800	CCA Surface Owners/South Pannel
VARNER DEBBI JO	PO BOX 88	BAKER	MT	59313-0088	CCA Surface Owners/South Pannel
VASSAR JOHN SCOTT & RUTH ELLEN	2017 N JAY ST 1125 W HINSDALE	ABERDEEN	SD	57401-1324	CCA Surface Owners/Coral Gap
VOGEL HAROLD B AND MARION E	DR	LITTLETON	CO	80120-4141	CCA Surface Owners/South Pannel
WAGNER JAKE ET AL	PO BOX 420	BAKER	MT	59313-0420	CCA Surface Owners/ELOB
WALTERMAN DAVID E ET AL	4616 105TH ST SW	STEWARTVILLE	MN	55976-8158	CCA Surface Owners/South Pannel
WBI ENERGY TRANSMISSION INC	PO BOX 5650	BISMARCK	ND	58506-5650	CCA Surface Owners/South Pannel
WHITNEY JAMES W	PO BOX 795	BAKER	MT	59313-0795	CCA Surface Owners/South Pannel
WILLIAMS CURT L	PO BOX 1199	BAKER	MT	59313-1199	CCA Surface Owners/South Pannel
WIMAN KAY A ET AL	PO BOX 37	BAKER	MT	59313-0037	CCA Surface Owners/South Pannel
WIMAN KENNETH P	PO BOX 11	BAKER	MT	59313-0011	CCA Surface Owners/South Pannel
WIPPERLING RODNEY A & AUDREY L	213 SCHOOL HOUSE ROAD	BAKER	MT	59313-9425	CCA Surface Owners/South Pannel
WOOD KAY A	PO BOX 37	BAKER	MT	59313-0037	CCA Surface Owners/South Pannel
WYRICK H JASEN & HEIDI L	PO BOX 52	BAKER	MT	59313-0052	CCA Surface Owners/South Pannel
WYRICK HAROLD A JASON AND HEIDI	PO BOX 52	BAKER	MT	59313-0052	CCA Surface Owners/South Pannel
ZACHMANN & SONS CONSTRUCTION	PO BOX 295	BAKER	MT	59313-0295	CCA Surface Owners/South Pannel
Riesland, Penny, Patty and Curt	8 Riesland Drive	BROADUS	MT	59317	Surface Owners/Pipe Line
BLM	819 Main St.	BILLINGS	MT	59105	Surface Owners/Pipe Line
Hurley William and Linda	6619 Coffeen Avenue	SHERIDAN	WY	82801	Surface Owners/Pipe Line
Shafer II Samuel T.	2722 Sassick St.	GILLETTE	WY	82718	Surface Owners/Pipe Line
W Butte Ranch	290 W. Butte Lane	ALZADA	MT	59311	Surface Owners/Pipe Line
Nixon Donald G.	2491 Alzada Ridge Road	ALZADA	MT	59312	Surface Owners/Pipe Line
STACK ROCK INC	2980 Alzada Ridge Road	ALZADA	MT	59311	Surface Owners/Pipe Line
Kreiter Nancy	P.O. Boxes 1214	WOODLAND	CA	95695	Surface Owners/Pipe Line
Axt Garry	P.O. Box 201	PLEASANT VIEW	CO	81331	Surface Owners/Pipe Line
Cathey Jerry and Norma	P.O. Box 334	HAMMOND	MT	59332	Surface Owners/Pipe Line
Harrington Dan	P.O. Box 345	HAMMOND	MT	59332	Surface Owners/Pipe Line

## Landowners Permittees

Cook Ranch Trust	3509 Kingswood Drive	BILLINGS	MT	59101	Surface Owners/Pipe Line
Giacometto Lawrence	P.O. Box 515	BROADUS	MT	59317	Surface Owners/Pipe Line
Giacometto Robert	P.O. Box 9442	RAPID CITY	SD	57709	Surface Owners/Pipe Line
Talcott Ronald D.	P.O. Box 255	HAMMOND	MT	59333	Surface Owners/Pipe Line
Gardner Douglas A.	P.O. Box 257	HAMMOND	MT	59332	Surface Owners/Pipe Line
Phillippi Lester Gale	2421 Hammond Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
Brownfield Ranch Inc.	2220 Hammond Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
Lambert William R.	2343 Hammond Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
Talcott Inc. Kenneth D.	11 East Powderville Road	BROADUS	MT	59317	Surface Owners/Pipe Line
Tauck Land and Livestock Co.	700 Tauck Rd.	HAMMOND	MT	59332	Surface Owners/Pipe Line
Owen Lyle	62 Cottonwood Creek Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
L & L Ranch Inc	930 Hammond Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
Western Star Inc	201 Larson Loop Rd	EKALAKA	MT	59324	Surface Owners/Pipe Line
Stieg, Tom and Kathy	363 Stieg Lane	HAMMOND	MT	59332	Surface Owners/Pipe Line
Yang Sun Trust	338 Spear St., Unit 5E	SAN FRANCISCO	CA	94105	Surface Owners/Pipe Line
Rosencranz Ronald	685 Ridgeway Ridge Road	HAMMOND	MT	59332	Surface Owners/Pipe Line
Belltower Ranch Inc	2783 Highway 323	EKALAKA	MT	59324	Surface Owners/Pipe Line
Wolff Ranch Inc.	1751 Highway 323	EKALAKA	MT	59324	Surface Owners/Pipe Line
Cline Jerry D.	P.O. Box 466	EKALAKA	MT	59324	Surface Owners/Pipe Line
McCabe Enterprises, LLC.	890 Hwy 323	EKALAKA	MT	59324	Surface Owners/Pipe Line
Loehding Ranch Inc	352 Pershing Cutoff	EKALAKA	MT	59324	Surface Owners/Pipe Line
Lolley Marnee, Wiman Irene, Wimett Lisa, DeViney Vivica	15555 W. Prairie Dunes Dr.	SURPRISE	AZ	85374	Surface Owners/Pipe Line
Thornton George Mark	285 Tyler Road	OCILLA	GA	31774	Surface Owners/Pipe Line
Walker, Travis	PO Box 244	EKALAKA	MT	59324	Surface Owners/Pipe Line
Walker, Jamie	PO BOX 431	EKALAKA	MT	59324	Surface Owners/Pipe Line
Nies Robert and Carole	PO BOX 473	EKALAKA	MT	59324	Surface Owners/Pipe Line
Jardee Tom	1441 Mill Iron Camp Crook Road	EKALAKA	MT	59324	Surface Owners/Pipe Line
Jardee Ranch	1443 Mill Iron Camp Crook Road	EKALAKA	MT	59324	Surface Owners/Pipe Line
Baldick Virginia	10505 Raleigh LaGrange Road E	EADS	TN	38208	Surface Owners/Pipe Line
Welch, Theodore Curtis	1611 Custer Ave.	BILLINGS	MT	59102	Surface Owners/Pipe Line
Bergstrom Blanche Moser and Thomas, & Owens Pamela	P.O. Box 951	BAKER	MT	59313	Surface Owners/Pipe Line
Lohof Cattle Company, Inc.	P.O. Box 944	BAKER	MT	59313	Surface Owners/Pipe Line
Wildish Esther	P.O. Box 383	BAKER	MT	59313	Surface Owners/Pipe Line
Kenneth Patrick, Jr. & Wiman Debi	P.O. Box 11	BAKER	MT	59313	Surface Owners/Pipe Line
Zupanik Ranch LLC	P.O. Box 459	BAKER	MT	59313	Surface Owners/Pipe Line
Tronstad Cynthia	P.O. Box 894	BAKER	MT	59313	Surface Owners/Pipe Line
Hayden Dave A. ETAL	211 Chimney Creek Road	BAKER	MT	59313	Surface Owners/Pipe Line
Tronstad John & Clarice	751 Webster Road	BAKER	MT	59313	Surface Owners/Pipe Line



## Landowners Permittees

U Hanging 7 Ranch, Inc	337 Wrangler Trail	BAKER	MT	59313	Surface Owners/Pipe Line
Johnson Darrell	1201 101 Road	BAKER	MT	59313	Surface Owners/Pipe Line
Quarter Circle UU Ranch	337 Wrangler Trail	BAKER	MT	59313	Surface Owners/Pipe Line
Erickson Garnee and Olsen Roy	971 101 Road	BAKER	MT	59313	Surface Owners/Pipe Line
Hande Casey & Kadee	7501 160 <sup>th</sup> Avenue SW	RHAME	ND	58651	Surface Owners/Pipe Line
Wiley Butte Properties, LLC	152 Wiley Butte Trail	BAKER	MT	59313	Surface Owners/Pipe Line
Schweigert Ranch Inc	152 Wiley Butte Trail	BAKER	MT	59313	Surface Owners/Pipe Line
Owens Tom	PO Box 951	BAKER	MT	59313	Surface Owners/Pipe Line
Kono Lance & Katelyn	P.O. Box 612	BAKER	MT	59313	Surface Owners/Pipe Line
Baker Ollie Land LLC	P.O. Box 702	BAKER	MT	59313	Surface Owners/Pipe Line
Nelson Martin & Susan	P.O. Box 434	BAKER	MT	59313	Surface Owners/Pipe Line
Degradand Arthur and Kathy	P.O. Box 937	BAKER	MT	59313	Surface Owners/Pipe Line
Rieger Jacob & Angela	P.O. Box 341	BAKER	MT	59313	Surface Owners/Pipe Line
Brown Carla	P.O. Box 643	BAKER	MT	59313	Surface Owners/Pipe Line
Pinnow Craig & Wanda	P.O. Box 39	BAKER	MT	59313	Surface Owners/Pipe Line
Afrank Leslie	P.O. Box 1076	BAKER	MT	59313	Surface Owners/Pipe Line
Kirschten James Residentiary Trust , Kirschten Michael & Shane, Trustees	P.O. Box 1131	BAKER	MT	59313	Surface Owners/Pipe Line
Braun Kevin & Maria	P.O. Box 707	BAKER	MT	59313	Surface Owners/Pipe Line
Schieser Kenneth	18 Santa Rosa Avenue	SAUSALITO	CA	94965	Surface Owners/Pipe Line
Jensen Tim & Carol	P.O. Box 934	BAKER	MT	59313	Surface Owners/Pipe Line
Lang & Sons Inc.	P.O. Box 491	BAKER	MT	59313	Surface Owners/Pipe Line
Schweiger Dale and Brinda	4510 Highway 7	BAKER	MT	59313	Surface Owners/Pipe Line
Century Ranch, LLC	40804 220 Street	LAMBERTON	MN	56152	Surface Owners/Pipe Line
Scott Kettleman	P.O. Box 183	EKALAKA	MT	59324	Surface Owners/Pipe Line
Hammel Ranch, Inc	P.O. Box 213	EKALAKA	MT	59324	Surface Owners/Pipe Line

## Local Government

<u>L Name</u>	<u>F Name</u>	<u>Agency</u>	<u>Addr 1</u>	<u>Addr 2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
		Powder River County Commissioners	P.O. Box 200		Broadus	MT	59317
		Carter County Commissioners	P.O. Box 315		Ekalaka	MT	59324-0315
		Fallon County Commissioners	P.O. Box 846		Baker	MT	59313-0846

## Operators

Company Name	Operator Name	Operator Address	Operator City	State	Zip Code	Comments
OneOK	Attn Buz Hohmeyer	100 W 5 <sup>th</sup>	Tulsa	OK		PipelineCompanies Adjacent to proposed ROW
Trans Canada	Attn: Andrew Craig	700 Louisiana	Houston	TX		PipelineCompanies Adjacent to proposed ROW
Scout Energy Management, LLC	Attn: Vicky Harsh	4901 LBJ FWY, Suite #300	Farmers Branch	TX	75244	Operators within field portion of project
Diamond Oil & Gas, LLC:	Attn: Kyle True	1541 Diamond Dr.	Casper	WY	82601	Operators within field portion of project
Williston Basin Interstate Pipeline Co.	Attn: Thomas Stortz	P.O. Box 5601	Bismarck	ND	58506	Operators within field portion of project
Bridger Pipeline	Attn: Tom Litman	PO Drawer 2360	Casper	WY	82602	Operators within field portion of project
J & J Guide Service/Living the Dream Outdoor LLC	Richard Schneider	PO Box 456	Ekalaka	MT	59324	Outfitters from BLM-Recreation
Sizzlin S Outfitters	Rod Paschke	PO Box 532	Jordan,	MT	59337	Outfitters from BLM-Recreation
Gardner Ranch Outfitters	Doug Gardner	Box 629	Hammond	MT	59332	Outfitters from BLM-Recreation
Blue Rock Outfitters	Mike Zmek	PO Box 673	Fullerton	NE	68638	Outfitters from BLM-Recreation
Powder River Outfitters	Travis Anderson	PO Box 1563	Miles City	MT	59301	Outfitters from BLM-Recreation

## State Government

<u>L_Name</u>	<u>F_Name</u>	<u>Agency</u>	<u>Addr_1</u>	<u>Addr_2</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Governor Bullock	Steve	Montana State Capitol Bldg	P O Box 200801		Helena	MT	59620-0801
Mason	Monte	MT Dept Of Natural Res & Conservation		P O Box 201601	Helena	MT	59620-1601
		MT Dept Of Fish Wildlife & Parks	P.O. Box 200701		Helena	MT	59620-0701
Schmitz	Brad	MT Dept Of Fish Wildlife & Parks-Region 7	PO Box 1630	352 I-94 Business Loop	Miles City	MT	59301
Opper	Richard	MT Dept Environmental Quality	P.O. Box 200901	1520 E. Sixth Avenue	Helena	MT	59620-0901
Yde	Chris	MT Dept Environmental Quality	P.O. Box 200901	1520 E. Sixth Avenue	Helena	MT	59620-0901
		MT Dept Environmental Quality-Billings Off	Airport Business Park IP-9	1371 Rimtop Drive	Billings	MT	59105-1978
Pease-Lopez	Carolyn	MT House District 42	5723 U S Highway 87 E		Billings	MT	59101-9074
Pileski	Chris	MT DNRC-Eastern Land Office	P.O. Box 1794		Miles City	MT	59301
Richmond	Tom	MT DNRC - Board of Oil and Gas	2535 St. Johns Avenue		Billings	MT	59102
Baumler	Dr. Mark	MT State Historic Preservation Office	1301 East Lockley Avenue	P.O. Box 201202	Helena	MT	59620
Lemon	Renee	MT Dept Of Fish Wildlife & Parks-	Responsive Mngmt Unit	P.O. Box 200701	Helena	MT	59620
Coleman	Ed	MT DEQ-Industry & Energy Minerals Bureat	1520 E. Sixth Avenue	P.O. Box 200901	Helena	MT	59620-0901
		Montana Department Of Transporation	2701 Prospect Ave		Helena	MT	59620-1001
		Montana School Trust Lands	P.O. Box 200901		Helena	MT	59620-0901

## **Appendix C- Attendance at Scoping Meetings**

BUREAU OF LAND MANAGEMENT

MILES CITY FIELD OFFICE

SCOPING MEETING ATTENDANCE

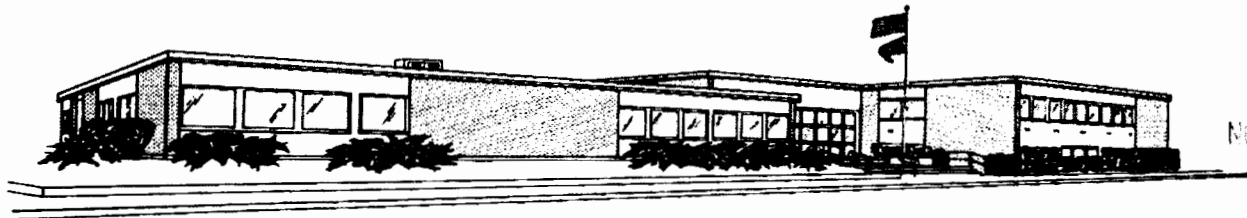
MEETING: Denbury CO2 Pipeline and EOR Public Scoping Meeting

Location: Ekalaka Event Center (Ekalaka, MT)

Date: October 25. 2017

NAME/ORGANIZATION	ADDRESS
Bill Atchison/Denbury	5320 Legacy Dr., Plano, TX 75024
Rusty Shaw/ Denbury	5320 Legacy Dr., Plano, TX 75024
Roy Rost/ Fallon Co	Baker
Steve Baldwin/ Fallon Co	Baker
Kenneth Bogner/ Senator Daines	
Jason Rittal/ Fallon Co	PO Box 846 Baker
Rod Tauck/ Carter Co	700 Tauch Rd. Hammond MT
Wade Sikorski	1511 Highway 7 Baker, MT 59313
Tayla Snapp	222 N 32 <sup>nd</sup> St Ste. 900 billings, MT 59107
Luther Waterlad	Box 28 Ekalaka 59324

## **Appendix D- Agency Letters**



NOV 2017

<p><b>County Commissioners</b>  Phone 377-3562  Douglas A. Buxbaum, Chairman  Gary Kartevold, Member  Dennis Zander, Member</p>	<p><b>County of Dawson</b>  <b>207 W. Bell ST</b>  <b>Glendive, MT 59330</b>  www.dawsoncountymontana.org</p>	<p><b>Clerk and Recorder</b>  Phone 377-3058  Shirley Kreiman    <b>County Treasurer</b>  Phone 377-3026  Vickie Boje</p>
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October 25, 2017

Bureau of Land Management  
Miles City Field Office  
Attention: Irma Nansel  
111 Garryownen RD  
Miles City, MT 59301

RE: NEPA #: DOI-BLM-MT-C020-2017-0081-EA

Dear Ms. Nansel;

We support the CO2 Pipeline and Enhanced Oil Recovery Development proposed by Denbury Resources along the Cedar Creek Anticline. Denbury Resources is a proven industry leader in utilizing CO2 as an EOR method, not only nationally but in the State of Montana.

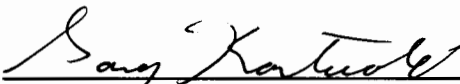
Using CO2 as an EOR method allows for additional recovery of a natural resource that would be utilized using conventional production techniques. The recovery of this additional resource will provide an extra economic benefit through additional jobs, severance taxes and income for all Montanans and Eastern Montana Counties.

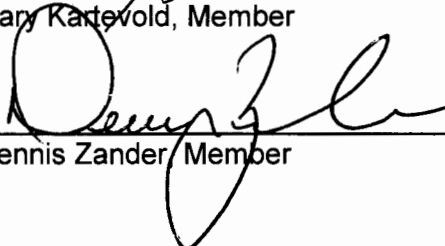
We are assured that BLM will ensure that this project is done in an efficient and environmentally manner. We encourage BLM to expedite the permitting process so that all involved can as quickly as possible, enjoy the economic and environmental benefits going forward.

Respectfully,

BOARD OF COUNTY COMMISSIONERS  
Dawson County, Montana

  
\_\_\_\_\_  
Doug A. Buxbaum, Chairman

  
\_\_\_\_\_  
Gary Kartevold, Member

  
\_\_\_\_\_  
Dennis Zander, Member





# FALLON COUNTY

COMMISSIONERS	CLERK & RECORDER/ SUPT OF SCHOOLS	JUSTICE OF THE PEACE	COUNTY ATTORNEY	CLERK OF COURT	TREASURER/ASSESSOR	SHERIFF/CORONER
Steve Baldwin, District 3	Nicole Benefiel	Darcy Wassmann	Jeraldine Newell	Barbara E. Ketterling	Trent Harbaugh	
Deb Ranum, District 1	Brenda J. Wood	PO Box 760	PO Box 1521	PO Box 787	PO Box 899	
Roy Rost, District 2	PO Box 846	Baker, MT	Baker, MT	Baker, MT	Baker, MT	
PO Box 846, Baker MT	Baker, MT	Phone 778-7128	Phone 778-3006	Phone 778-7114	Phone 778-7109	Phone 778-2879
Phone 778-7107	Phone 778-7106					

October 23, 2017

Bureau of Land Management  
Miles City Field Office  
Attention: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301-7000

RE: NEPA number: DOI-BLM-MT-C020-2017-0081-EA  
Support Denbury CO2 Pipeline & Enhanced Oil Recovery Development

Planning & Environmental Coordinator Nansel,

Fallon County has been an agricultural county since its creation, but since 1951 when oil was first produced in the Cedar Creek Anticline it also has been an oil county. These two major industries, including natural gas with oil, have an ebb and flow of pricing in markets and agriculture is further dependent upon weather. Unfortunately, recent years have been down for both markets putting extreme strain on the local economy.

The Cedar Creek Anticline Pipeline aka Denbury Green Pipeline-Montana, LLC and Enhanced Oil Recovery Projects proposed by Denbury Resources, Inc. are both critical projects for the benefit of Fallon County's residents and furthermore for the State of Montana. The economic and environmental benefits of this project are substantial, including new high wage jobs, increased production of otherwise inaccessible oil, and a growing tax base which leads to community investment in infrastructure and critical public services.

In a time when investment is most needed to shore up the second major economic stool in Fallon County's economy and when the State of Montana is also in need of new revenue to limit long term reductions in services impacting Montana's most in need, this project could not be more important.

Denbury is a reputable company and has proven to be a good neighbor both to Fallon County and the State of Montana. They have proven to be a responsible natural resource extractor and have stepped up to the table with an investment proposal for Montana that is good for all.

Please consider permitting the proposed projects in a timely manner. Fallon County and the State of Montana will benefit in extending the legacy of the Cedar Creek Anticline in this environmentally responsible manner.

Respectfully,

Fallon County Commission

DEPARTMENT OF NATURAL RESOURCES  
AND CONSERVATION



STEVE BULLOCK, GOVERNOR

1539 ELEVENTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE (406) 444-2074  
FAX: (406) 444-2684

PO BOX 201601  
HELENA, MONTANA 59620-1601

November 2, 2017

Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, Montana 59301-7000  
Attn: Irma Nansel

NOV 2017

Dear Ms. Nansel,

Per your request for comments regarding the proposed Denbury Green Pipeline-Montana LLC (DGPM) project, on behalf of the Montana Department of Natural Resources and the State of Montana, we are strongly supporting the development of this pipeline for the primary purpose of transporting carbon dioxide from plants and facilities which can then be used to initiate Carbon Dioxide Enhanced Oil Recovery (CO<sub>2</sub> EOR) in the Cedar Creek Anticline in Fallon County, Montana. We believe this project serves the public interest and will be of benefit to the citizens of Powder River, Carter and Fallon counties, as well as for all citizens of Montana.

The strong support for this project is also a reflection of the outstanding partnership Denbury has with the State of Montana and the Montana Sage Grouse Conservation Program. Working with the state the company has provided key investments on addressing the impact of development on sage grouse habitat and the value of mitigation of these impacts. They have demonstrated that land stewardship is a core value of their company.

Development of the pipeline will bring substantial economic and environmental benefits to Montana. We expect to see the creation of new high wage jobs due to the significant capital investments being made in this project. We are excited to see that this project marks the beginning of the redevelopment and modernization of the legacy oil fields in the Cedar Creek Anticline which will result in many environmental improvements within those fields. In addition, expected growth in the production of otherwise stranded oil reserves will generate growing severance tax revenue for the State.

An affiliate of DGPM, Denbury Onshore, LLC, currently owns and operates the Bell Creek Field, a successful CO<sub>2</sub> EOR project that has been a showcase facility in our state. They have been a responsible operator and a company we are proud to call a corporate citizen of Montana.

We are excited to finally see this long-awaited project move forward. We encourage the BLM to proceed expeditiously in their permitting process. Together, our efforts, along with yours will ensure a smooth and certain regulatory process resulting in a positive project execution.

Sincerely,

A handwritten signature in black ink, appearing to read "John Tubbs".

John Tubbs, Director  
Department of Natural Resources and Conservation

DIRECTOR'S  
OFFICE  
(406) 444-2074

CONSERVATION & RESOURCE  
DEVELOPMENT DIVISION  
(406) 444-6667

OIL & GAS  
DIVISION  
(406) 444-6675

TRUST LAND  
DIVISION  
(406) 444-2074



October 25, 2017

OCT 2017

Miles City Field Office  
Attention: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301-7000

Subject: Denbury Resources – Carbon Dioxide Pipeline

Dear Mrs. Nansel,

The Montana Department of Transportation (MDT) staff would like to thank you for the opportunity to provide input regarding the proposed 110-mile carbon dioxide pipeline crossing Powder River, Carter and Fallon Counties.

If the proposal will have direct impact on MDT facilities or encroach into MDT right-of-way, please contact the District office regarding permitting. Without prior approval, the developer may be required to remove/repair all improvements or impacts at their own expense.

Please contact Troy Hafele, Glendive District Utility Agent at (406)345-8227 to discuss any necessary permits.

If you have any questions concerning this email, please feel free to contact me.

Thanks,

Sincerely,

Brianna Whitaker  
Transportation Planner  
Policy, Program & Performance Analysis Bureau

Attachment: Submittal from Bureau of Land Management

Copies: Shane Mintz - Glendive District Administrator  
Troy Hafele - Glendive District Utility Agent  
Mike Tierney – System Impact Analysis  
File

P.O. BOX 47  
FORSYTH, MT 59327  
406-346-2251  
FAX 406-346-7551

# ROSEBUD COUNTY COMMISSIONERS

Robert E. Lee, Member  
Douglas D. Martens, Member  
Ed Joiner, Member

October 25, 2017

Bureau of Land Management  
Miles City Field Office  
Attention: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301-7000

RE: NEPA number: DOI-BLM-MT-C020-2017-0081-EA  
Support Denbury CO2 Pipeline & Enhanced Oil Recovery Development

Planning & Environmental Coordinator Nansel,

The Cedar Creek Anticline Pipeline aka Denbury Green Pipeline-Montana, LLC and Enhanced Oil Recovery Projects proposed by Denbury Resources, Inc. are both critical projects for the benefit of Southeastern Montana's residents and furthermore for the State of Montana. The economic and environmental benefits of this project are substantial, including new high wage jobs, increased production of otherwise inaccessible oil, and a growing tax base which leads to community investment in infrastructure and critical public services.

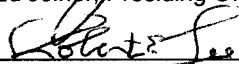
In a time when investment is most needed in Southeastern Montana's economy and when the State of Montana is also in need of new revenue to limit long term reductions in services impacting Montana's most in need, this project could not be more important.

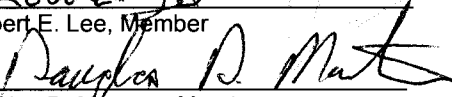
Denbury is a reputable company and has proven to be a good neighbor both to Southeastern Montana and the State of Montana. They have proven to be a responsible natural resource extractor and have stepped up to the table with an investment proposal for Montana that is good for all.

Please consider permitting the proposed projects in a timely manner. Southeastern Montana and the entire State of Montana will benefit in extending the legacy of the Cedar Creek Anticline in this environmentally responsible manner.

ROSEBUD COUNTY COMMISSIONERS

  
Ed Joiner, Presiding Officer

  
Robert E. Lee, Member

  
Douglas D. Martens, Member

P.O. BOX 47  
FORSYTH, MT 59327  
406-346-2251  
FAX 406-346-7551

# ROSEBUD COUNTY COMMISSIONERS

Robert E. Lee, Member  
Douglas D. Martens, Member  
Ed Joiner, Member

October 25, 2017

OCT 2017

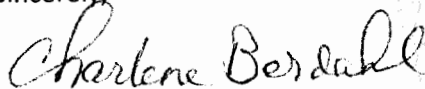
Bureau of Land Management  
Miles City Field Office  
ATTN: Irma Nansel  
111 Garryowen Road  
Miles City MT 59301-7000

RE: NEPA number DOI-BLM-MT-C020-2017-0081-EA  
Support Denbury CO2 Pipeline & Enhanced Oil Recovery Development

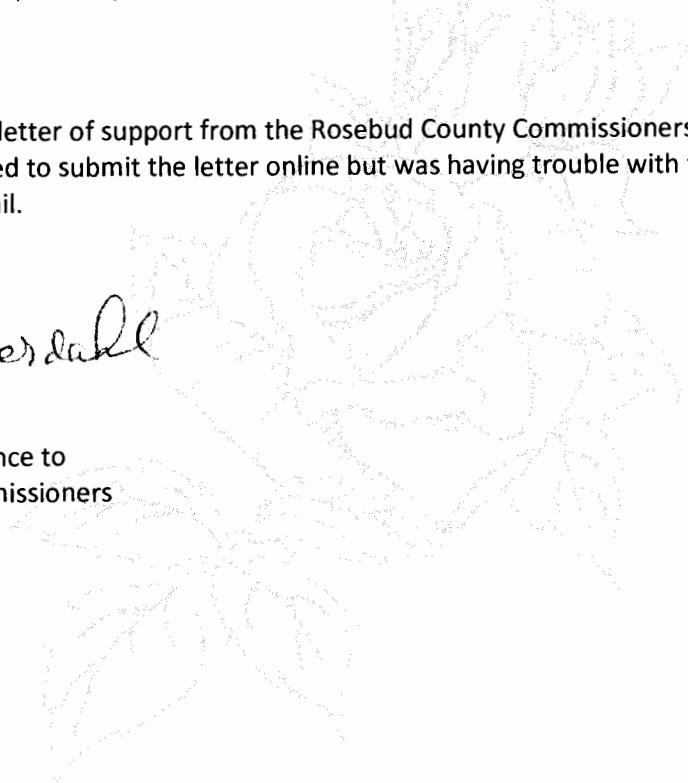
Dear Ms. Nansel:

Enclosed please find a letter of support from the Rosebud County Commissioners for the above-referenced. I attempted to submit the letter online but was having trouble with the website so am submitting it via US mail.

Sincerely,



Charlene Berdahl  
Administrative Assistance to  
Rosebud County Commissioners





# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Montana Ecological Services Office  
585 Shephard Way, Suite 1  
Helena, Montana 59601-6287

In Reply Refer To:  
File: M.02 BLM  
TAILS: 06E11000-  
2018-SL-0050  
06E11000-2018-  
CPA-0011

November 21, 2017

### Memorandum

To: Todd Yeager, Field Manager, Bureau of Land Management Miles City Field Office, Miles City, MT

From: for Jodi L. Bush, Office Supervisor, Helena, MT

Subject: Denbury Resources Enhanced Oil Recovery and CO<sub>2</sub> Pipeline Project Environmental Assessment Scoping Comments

This memorandum responds to the October 4, 2017, Bureau of Land Management (BLM) letter to the U.S. Fish and Wildlife Service (Service). The BLM letter requested Service scoping comments regarding the subject Denbury Resources (Denbury) Enhanced Oil Recovery and CO<sub>2</sub> Pipeline Project (Project) and forthcoming environmental assessment (EA). This response is provided by the Service under the authority of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531-1543), the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668-668d, 54 Stat. 250), as amended, and the Migratory Bird Treaty Act (16 U.S.C. 703-712), as amended.

### Threatened and Endangered Species

Listed threatened and endangered species that may be present in counties containing the proposed Project are listed in the following table. No proposed species, candidate species, or proposed or designated critical habitats occur in the Project area counties. We recommend that BLM visit the Service's Information for Planning and Consultation (IPaC) webpage (<https://ecos.fws.gov/ipac/>) for more detailed information regarding which species and habitats may be present in the immediate vicinity of the Project components.

County/Scientific Name	Common Name	Status, Range and Habitat
<b>CARTER</b>		
<i>Grus americana</i>	Whooping Crane	LE; Wetlands; migrant eastern Montana.
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT; Eastern Montana; caves, abandoned mines; roosts in live trees and snags.
<b>FALLON</b>		
<i>Grus americana</i>	Whooping Crane	LE; Wetlands; migrant eastern Montana.

County/Scientific Name	Common Name	Status, Range and Habitat
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT; Eastern Montana; caves, abandoned mines; roosts in live trees and snags.
<i>Charadrius melodus</i>	Piping Plover	LT; Missouri and Yellowstone River sandbars, alkali beaches; northeastern Montana.
<b>POWDER RIVER</b>		
<i>Grus americana</i>	Whooping Crane	LE; Wetlands; migrant eastern Montana.
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE; Bottom dwelling; Missouri, Yellowstone, Marias, Milk, Poplar, Powder, Tongue Rivers.
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT; Eastern Montana; caves, abandoned mines; roosts in live trees and snags.

LE = Listed Endangered, LT = Listed Threatened

If a federal agency authorizes, funds, or carries out a proposed action, the responsible federal agency, or its delegated agent, is required to evaluate whether the action “may affect” listed species or critical habitat. If the federal agency or its designated agent determines the action “may affect, is likely to adversely affect” listed species or critical habitat, the responsible federal agency shall request formal section 7 consultation with this office. If the evaluation shows a “may affect, not likely to adversely affect” determination, concurrence from this office is required. If the evaluation shows a “no effect” determination for listed species or critical habitat, further consultation is not necessary. If a private entity receives federal funding for a construction project, or if any federal permit or license is required, the federal agency may designate the fund recipient or permittee as its agent for purposes of informal section 7 consultation. The funding, permitting, or licensing federal agency is responsible to ensure that its actions comply with the ESA, including obtaining concurrence from the Service for any action that may affect a threatened or endangered species or designated critical habitat.

The northern long-eared bat (NLEB) may occupy suitable habitat in the general Project area. BLM may elect to address this species under an existing consultation process that employs the Service’s Optional Framework to Streamline Section 7 Consultation for the NLEB (Framework) and Key to the NLEB 4(d) Rule for Federal Actions that May Affect NLEBs (Key) (see <https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html> for process details and documents). In summary, federal agencies may fulfill their project-specific section 7 responsibilities for this species using the Service’s Framework, which relies on the finding of a programmatic biological opinion that the Service prepared for the NLEB 4(d) rule. This process is available for projects occurring both inside and outside (currently all of Montana) of the current White-Nose Syndrome (WNS) Zone. Requirements differ depending on whether projects occur inside or outside of the WNS Zone; the WNS Zone map is updated monthly with any new counties containing verified WNS occurrences. The Key provides a stepwise process to determine when it is appropriate to use the Framework to streamline consultation and when it is not. If an action may cause prohibited take of NLEBs, the Framework cannot be used and a separate (individual) section 7 consultation would be necessary for such projects. The Framework also includes several voluntary conservation measures that the Service recommends agencies incorporate into applicable projects when possible.

## **Greater Sage-Grouse**

In Montana, the greater sage-grouse is managed by the State of Montana (Montana Fish, Wildlife and Parks [MFWP] and Department of Natural Resources and Conservation [DNRC]) as well as by BLM on BLM-administered lands. Although no longer considered a candidate for listing under the ESA, the Service maintains great interest in this species and associated habitat and has committed to reviewing its status in 2020. The EA should discuss to what extent the Project affects core sage-grouse habitat as mapped by the State of Montana (Executive Orders 10-2014 and 12-2015), Priority Habitat Management Areas (PHMAs), or Restoration Habitat Management Areas (RHMAs) as identified in the BLM Miles City Field Office Approved Resource Management Plan (RMP), or general habitat as delineated under both the EOs and RMPs.

Where applicable, the EA should discuss and analyze sage-grouse use and habitat quality on proposed Project lands, and discuss how compliance with sage-grouse goals, objectives, management decisions, and procedures specified in the RMP and appendices would be achieved. If State permitting is required for the Project, we recommend that the required coordination (including sequential impact avoidance, minimization, reclamation, and compensation) with the DNRC, Conservation and Resource Development Division, regarding any applicable required compliance with Montana Executive Order 12-2015 and the Montana sage-grouse conservation strategy be clearly documented in the EA.

Clear descriptions of impact avoidance and minimization measures (including lek buffers, construction timing, noise standards, etc.) would greatly facilitate the understanding of anticipated impacts and should also be provided where applicable. We recommend that any required or voluntary compensatory mitigation and proposed means of achieving this mitigation be specifically described in the EA. We recommend that any applicable compensatory mitigation proposal be commensurate with the degree of impacts and offset any unavoidable impacts remaining after application of avoidance and minimization measures. In addition to the RMP, we refer you to the EOs and the Service's September 2014 Greater Sage-Grouse Range-wide Mitigation Framework for further guidance regarding mitigation. We understand and appreciate that Denbury has been very actively engaged with the State, Service, other federal agencies, and several other stakeholders in the development of a greater sage-grouse Habitat Quantification Tool (HQT) for purposes of quantifying any proposed project's impacts (debits) and/or offsets (credits) with regard to greater sage-grouse across Montana. We understand that the HQT may soon be finalized by the State for use in conjunction with EO (and RMP) implementation, and encourage its application in conjunction with this Project, once available.

## **Bald and Golden Eagles**

We recommend that the EA address potential impacts to eagles. The BGEPA prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald or golden eagles, including their parts, nests, or eggs. The BGEPA provides criminal and civil penalties for persons who take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof. The BGEPA defines "take" as pursue, shoot, shoot at,



poison, wound, kill, capture, trap, collect, molest or disturb. "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

The Service recommends use of appropriate eagle use and habitat survey results combined with project design, construction, and operational features and strategies designed to avoid impacts to eagles and important use areas (nests, foraging areas or roost sites that eagles rely on for breeding, sheltering, or feeding, as well as the surrounding landscape features that are essential for the continued viability of the sites for breeding, feeding or sheltering eagles) in order to minimize the risk of eagle take. Permits from the Service's Migratory Bird Management Division are required to lawfully take eagles or (occupied/unoccupied; active/inactive) eagle nests.

Where construction or disturbance is proposed in proximity to important bald eagle use areas, we recommend that at a minimum, the operator comply with siting recommendations, seasonal restrictions, and distance buffers specified in the 2010 Montana Bald Eagle Management Guidelines: An Addendum to Montana Bald Eagle Management Plan (1994). The Service's May 2007, National Bald Eagle Management Guidelines contains additional information on protecting bald eagles from disturbance due to human activity.

The Service has not issued golden eagle management guidelines. However, appropriate buffers for nests and other important use areas based on site-specific conditions should be developed in conjunction with this office if project activities are proposed in proximity to such areas. The Service generally recommends avoidance of occupied nest site disturbance between January 1 and August 15, or until young have fledged. Depending on site-specific conditions, the typically recommended 0.5-mile buffer distance for bald eagle important use areas may be inadequate to ensure avoidance of golden eagle disturbance; in such cases larger buffers may be warranted. We therefore recommend avoidance of occupied golden eagle territories where practicable; maximizing distances between nests (including alternate nests) and the siting of proposed project features; avoidance of occupied nest site disturbance during the nesting season; and avoidance / minimization of impacts to important golden eagle habitat (e.g., shrub-steppe and native grasslands) within golden eagle territories where possible.

## **Migratory Birds**

The MBTA prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds, their eggs, parts, and nests, except when specifically permitted. Executive Order 13186 requires that federal agencies evaluate the effects of proposed actions on migratory birds (including eagles) pursuant to NEPA "or other established environmental review process;"

restore and enhance the habitat of migratory birds, as practicable; identify where unintentional take reasonably attributable to agency actions has, or is likely to have, a measurable negative effect on migratory bird populations; and, with respect to those actions so identified, the agency shall develop and use principles, standards, and practices that will lessen the amount of unintentional take, developing any such conservation efforts in cooperation with the Service.

We recommend that the EA thoroughly address potential impacts to migratory birds, and document measures proposed to avoid, minimize, and offset, as appropriate, impacts to migratory birds resulting from Project implementation. Given the project size and scope, we suggest that BLM/Denbury consider developing a Migratory Bird Conservation Plan to facilitate discussion and documentation of the issues listed above; the Service is willing to assist with development of such a plan. To the maximum extent practicable, the Service recommends that construction activities be scheduled outside of the peak bird breeding season (approximately April 15-July 15) so as not to disrupt nesting birds. If work is proposed to take place during the peak breeding season or at any other time which may result in take of migratory birds, their eggs, or active nests, the Service recommends that project proponents take all practicable measures to avoid and minimize take, such as conducting pre-construction nest surveys and maintaining adequate buffers during construction, to protect the birds until the young have fledged. Active nests may not be removed without a permit from the Service's Migratory Bird Management Division.

The Service has developed, and continues to revise and develop, general and industry-specific conservation measures (including measures for oil and gas development) for avoiding and minimizing impacts to birds (<https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>). We recommend referencing and incorporating these resources and measures into the EA as appropriate. We recommend that any required new power lines be buried where feasible. If this is not feasible, they should be constructed according to electrocution and collision prevention guidelines developed by the Avian Power Line Interaction Committee (APLIC): 2006 Suggested Practices for Avian Protection on Power Lines and Reducing Avian Collisions with Power Lines: The State of the Art in 2012.

### **Wetlands and Streams**

We recommend that the EA discuss anticipated unavoidable impacts to wetlands and streams and measures proposed to avoid, minimize, and compensate for impacts to these resources. Wetlands should be delineated in the field per U.S. Army Corps of Engineers (Corps) procedures, and appropriate permits acquired from the Corps, prior to disturbance of such areas. We also recommend that compensatory stream and wetland mitigation that appropriately replaces lost stream and wetland functions is implemented and functional prior to disturbance of such areas in conjunction with the Project.

## Other Comments

We recommend coordination with Montana Fish, Wildlife & Parks at 1420 East Sixth Ave., P.O. Box 200701, Helena, MT 59620-0701, 406-444-2535, the Montana Natural Heritage Program, 1515 East 6th Avenue, Box 201800, Helena, MT 59620-1800, 406-444-5354. These agencies may be able to provide updated, site-specific information regarding all fish and wildlife resources occurring in the proposed Project area.

As part of the National Wildlife Refuge System (NWRS), the Service administers fee title Refuge Waterfowl Production Areas and wetlands and grassland easements throughout Montana. We advise BLM to review county plat maps to determine if the proposed Project, as currently aligned, ROW and appurtenant infrastructure would cross Service property interests. If so, we recommend that all property interests within the NWRS be avoided during Project construction. If this is not possible, special use permits (SUP) or ROW grants may be necessary for construction activity that would cross NWRS property interests.

The Project description should include a discussion of temporary or permanent roads or trails that will be constructed to access and maintain the proposed pipeline. Since these may have continuing impacts on migratory birds, the document should address how those continuing impacts will be addressed. The analysis should include a description of the plans for operation and maintenance of the pipeline as well as a plan for eventual decommissioning. These plans should include a description of how the land will be returned to its pre-existing condition.

The Service recommends that Denbury develop and implement a restoration plan, in particular for the impacted native grassland, sage brush-steppe, and wetlands along the proposed Project pipeline route. Native habitats in the proposed Project area should be surveyed to determine existing species composition and replanted with a mix designed to replace the diversity and composition of native plant communities along the pipeline route. Seed stock should be obtained from nurseries within 250 miles of the Project area to insure the particular cultivars are well adapted to the local climate. The restoration plan should include measures to prevent invasive non-native species establishment, monitoring commitments, and success criteria.

Sensitive resources that should be considered in siting all project facilities (e.g., wells, pads, pipeline, roads, etc.) include threatened and endangered species and their habitat; bald and golden eagle and other migratory bird species nesting and habitat; greater sage-grouse and designated habitats; wetlands; ephemeral, intermittent and permanent streams; naturally wooded draws; sagebrush habitat; native prairie, prairie dog towns, and NWR and WMD lands. Additional recommendations include:

- Directionally bore under wetlands and ephemeral, intermittent, and perennial streams at depths sufficiently engineered to prevent exposure from scour or other causes;
- Install and maintain appropriate erosion control measures to reduce sediment transport to adjacent wetlands and stream channels;

- Enact best management practices to avoid and minimize the spread of noxious weeds and other undesirable exotic plant species within the proposed Project area; and
- Confine the disturbed area along proposed ROWs as narrow as possible, especially in or near sensitive resources such as native prairie, sagebrush habitat, wooded draws, wetlands, or streams.

Thank you for the opportunity to review and comment on this proposed Project. If you require clarifications or have any questions regarding these comments, please contact Jeff Berglund in this office at [jeff\\_berglund@fws.gov](mailto:jeff_berglund@fws.gov) or (406) 449-5225, extension 206, or at the letterhead address.

## BLM ePlanning Website Agency Comments

<p>MTDENBURYSC-1-67285</p>	<p>Wibaux County Supports Denbury CO2 Project</p>	<p>Wibaux County Commission is in full support of the proposed Denbury CO2 Project. This project will impact our economy in Wibaux County and the other Counties that border Fallon County. Denbury has been a great company for our regions economy. This pipeline they are proposing wil transport up to 400 million cubic ft per day of CO2. This pipeline will help capture and transport an energy product safely and the most economical. This pipeline will drive good paying jobs and help Denbury maintain a strong postion in the Cedar Creek anticline. The Wibaux County Commission feels this pipeline will help capture more oil in the region and help with revenue for the Counties impacted by this project. We hope that the BLM will approve this project and support Denbury with this pipeline project.</p>
<p>MTDENBURYSC-1-67782</p>	<p>Denbury CO2 Pipeline and Enhanced Oil Recovery Plan</p>	<p>Carter County supports the Denbury CO2 Pipeline and Enhanced oil Recovery Plan of Development. As commissioners, we see this as an opportunity to build and improve our infrastructure by way of increased taxable value. This project will allow us to improve the condition of our county roads, replace some bridges and upgrade some of our existing facilities. The pipeline will boost the economy in Carter County and possibly provide employment for some of our residents. We are planning on replacing the Dahl Memorial Healthcare Facility. Increased valuation will lessen the tax burden of the producers in the county, We see this project as a positive move toward improving our rural health care in Carter County. We feel strongly that this project be supported as not only will Carter County benefit but contiguous counties as well.</p>
<p>MTDENBURYSC-1-67832</p>	<p>Denbury support of CO2 pipeline</p>	<p>The Prairie County Commissioners are in full support of construction of the CO2 pipeline as presented to the BLM, Miles City Office. Access across federal ownership is vital for all natural resource development and use weather it is renewable or non renewable.</p> <p>As the demand for oil increases and climate change becomes of greater and greater concern, it only stands to reason that impacts to development have actions to reduce CO2 in the atmosphere. This project does just that.</p> <p>As for Sage Grouse (GSG) habitat..... Aggressive predator control of the 1950-1960s actually increased the habitat range of GSG, which made for increased man made GSG population. Under the current ESA, USFWS can not take man made increases in habitat or population into consideration which makes their current status faults.</p> <p>Again, Prairie County is in full support.</p>

## **Appendix E- Individual Letters**



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Miles City Field Office  
111 Garryowen Road  
Miles City, Montana 59301-7000  
www.blm.gov/mt  
October 4, 2017



In Reply Refer To:  
(MTC023/022)

OCT 2017

Dear Reader:

The Bureau of Land Management (BLM) Miles City Field Office (MCFO) received two Plans of Development from Denbury Resources, Inc. within the Miles City Field Office. The proposals are a 110 mile carbon dioxide (CO<sub>2</sub>) pipeline crossing Powder River, Carter, and Fallon Counties; and a 44,490 acre Enhanced Oil Recovery development project within Fallon County. Maps of the project areas are available on the BLM e-Planning project website as listed below.

The BLM is responsible for preparing the environmental assessment (EA) under the National Environmental Policy Act (NEPA) of 1969, as amended and for compliance with the National Historic Preservation Act (NHPA; 54 U.S.C. Part 306108), as amended, in accordance with the 2015 MCFO Approved Resource Management Plan and Record of Decision.

As a part of the planning process the BLM has initiated a 30-day scoping period on the proposals starting on October 5, 2017. Public scoping comments are being requested to identify relevant issues concerning the above proposals. These scoping comments are most useful when they are specific, cite relevant issues and/or determine the extent of those issues.

Written scoping comments must be postmarked by November 3, 2017 to be considered. Electronic comment may only be submitted via e-Planning as listed below; however, if you prefer to submit hard copy comments you can mail or hand-delivery during regular business hours (8:00 a.m. to 4:30 p.m.) to:

Electronic: BLM e-Planning website - <https://eplanning.blm.gov>  
Search for NEPA number **DOI-BLM-MT-C020-2017-0081-EA**  
Click "**Documents**"  
Click "**Comment on Document**"

Mail: Miles City Field Office  
Attention: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301-7000

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in

your comment to withhold, from public view, your personal identifying information, we cannot guarantee that we will be able to do so. All submissions from organizations, from businesses, and from individuals identifying themselves as representatives of organizations or businesses, will be available for public review.

In addition, the BLM will hold a public scoping meeting at the Ekalaka Event Center, 209 Speelmon West, Ekalaka, Montana on Wednesday, October 25, 2017 from 4:00 P.M. – 6:00 P.M. At the meeting, the BLM will present the review process and Denbury Resources, Inc. will present the proposals. After these presentations, MCFO staff members will be available to the public. The public will have the opportunity to submit their comments in writing during the meeting.

After the scoping period, an EA will be prepared to analyze the proposals. BLM plans to have this EA available for a public comment period sometime in the summer of 2018. The EA will be posted on the BLM e-Planning website at <https://eplanning.blm.gov> by conducting a "Text Search" for NEPA number DOI-BLM-MT-C020-2017-0081-EA. A letter requesting your assistance in providing comments to this EA will be sent to you at that time.

Please contact, Irma Nansel, Planning and Environmental Coordinator, at (406) 233-3653 with questions. We appreciate your attention and look forward to hearing from you.

Sincerely,



Todd D. Yeager  
Field Manager

what is wrong with the people who are Anti Industry  
MT needs all the oil industry it can get. Baker, M.  
was doing very good and was building new houses  
and many people were employed and spending money -  
Oil field slowed down and now we can't empty houses  
and the few people working - let Denbury bring in CO<sub>2</sub>  
line - more employed people and the oil field gaining  
good again. GO AHEAD AND DO IT!

George L. Christ.  
Box 104 920 Chs. St.  
Baker, MT 59313



Transcription of Letter handwritten on previous page by George E. Oluid

“What is wrong with the people who are anti industry MT needs all the oil industry it can get. Baker, MT was doing very good and was building new houses and many people were employed and spending money- Oil field slowed down and now you go count empty houses and the few people working. Let Denbury bring in CO<sub>2</sub> line- more employed people and the oil field going good again. GO AHEAD AND DO IT!

George E Oluid

Box 104 920 (?) St.

Baker, MT 59310



**WE MEAN BUSINESS**

**TOLL-FREE: 888.442.6668**

**LOCAL: 406.442.2405**

**FAX: 406.442.2409**



Miles City Field Office – BLM  
Attn: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301

2 November 2017

Dear Miles City Field Office of the BLM:

Thank you for the opportunity to comment on the two Plans of Development from Denbury Resources, Inc. under your consideration that comprise the Cedar Creek Anticline (CCA) Pipeline project. The Montana Chamber of Commerce strongly supports the approval of Denbury's proposal because of the positive economic and environmental impact it will have on our state. Projects like the CCA Pipeline that encourage business investment and create jobs in Montana is a hallmark of the business climate objective in our 10-year strategic plan, Envision 2026.

The Montana Chamber urges the BLM to undertake the necessary permitting steps for the CCA Pipeline project for the following reasons:

- Instant economic development in Powder River, Carter, and Fallon Counties, with a ripple effect statewide;
- Carbon dioxide enhanced oil recovery (CO<sub>2</sub> EOR) is a proven process. CO<sub>2</sub> EOR operations by Denbury alone have resulted in the gross production of over 155 million barrels of otherwise stranded oil;
- The 14 operational fields of the CCA project will yield new, high-wage jobs for Montanans;
- Significant severance tax base growth at a time when it is needed most;
- Aging legacy CCA fields will see investments in environmental improvement.

Denbury has a strong track record of operating responsibly in Montana. The Montana Chamber has long held the position that responsible natural resource development has and will continue to pay dividends to our state for decades to come. Especially in areas that have already utilized primary and secondary recovery methods, there is strong reason to permit the use of existing infrastructure to realize the full economic potential of such projects.

Thank you again for your consideration of this important development proposal.

Sincerely,

Webb Scott Brown  
President & CEO

Alan Olson  
Executive Director

**OFFICERS**

Kent Beers, President  
Empire Resources LLC

Shane LaCasse, Vice President,  
Downstream, CHS Inc.

Tanner Egan, Vice President,  
Upstream, Augustus Energy

Mac McDermott, Treasurer  
MCR, LLC

**BOARD OF DIRECTORS**

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Ballard Petroleum Holdings LLC

Dave Ballard  
Ballard Petroleum Holdings LLC

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Crowley Fleck PLLP

Greg Brown  
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Nance Resources/GTUIT

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XTO Energy

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NorthWestern Energy

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Jack King  
Hancock Enterprises

Michael Kukuk  
Oasis Petroleum North America

Wayne Leiker  
Calumet Montana Refining

David Linn  
WBI Energy, Inc.

Tony Lucero  
Enerplus Resources (USA) Corp.

Ashley McNamee  
Whiting Petroleum Corp.

HJ Reed  
Phillips 66

Dave Schaenen  
DLD Enterprises

Greg Schnacke  
Denbury Resources, Inc.

Burt Todd  
Montana Tech

Tad True  
True Oil LLC

November 1, 2017

Miles City Field Office  
ATTN: Irma Nansel  
111 Garryowen Road  
Miles City, Montana 59301-7000

RE: DOI-BLM-MT-C020-2017-0081-EA, Denbury Resources Pipeline and Enhanced Oil Recovery Project

Dear Ms. Nansel:

The Montana Petroleum Association (MPA) submits the following comments in support of the Cedar Creek Anticline Pipeline (Denbury Green Pipeline-Montana, LLC).

MPA is a Montana based trade association representing over 170 member companies involved in all aspects of the oil and natural gas industry. MPA's members include producers, refiners, suppliers, pipeline operators, and transporters, as well as service and supply companies that support all segments of the industry and employ over 29,000 people in our great state.

Denbury Resources is the largest oil producer in Montana, reviving mature oil fields through methods of enhanced oil recovery which contribute substantially to the local economy of Baker, Montana and the surrounding area, as well as the State. Denbury possesses a strong track record of operating responsibly in Montana.

**Background**

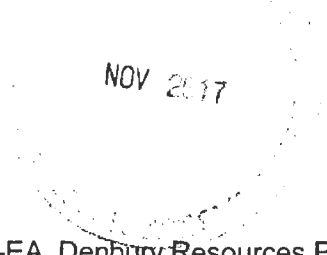
The Cedar Creek Anticline (CCA) encompasses 2,000 square miles across two states and 7 counties. The CCA is a property prime for enhanced oil recovery (EOR) potential, and is currently the largest producing property owned by Denbury Resources (226,000 acres).

The proposed CCA Pipeline will begin at an interconnection with an existing Denbury-owned pipeline (Greencore Pipeline) in the Bell Creek oil field in Powder River County, and span 110 miles through Carter County into Fallon County and to the eastern Montana oil fields located on the Cedar Creek Anticline. The proposed Pipeline will end at the East Lookout Butte Field in Fallon County, Montana.

The CCA Pipeline will transport up to 400 million standard cubic feet of compressed carbon dioxide (CO<sub>2</sub>) per day for EOR. The CO<sub>2</sub> will be sourced from a plant that captures otherwise emitted CO<sub>2</sub> from facilities that produce CO<sub>2</sub> by industrial processes.

Proposed construction activity of the pipeline is planned to generally cooccur with an EOR CO<sub>2</sub> flood at CCA. The exact timing and schedule of the flood depends on future oil prices, permitting, and availability of CO<sub>2</sub>.

The pipeline will be designed, constructed and operated in accordance with the U.S. Department of Transportation (DOT) requirements of 49 CFR Part 195, and will be compliant with all applicable local, state and federal safety regulations.



The pipeline will be a significant and much needed economic investment for the economy of Montana.

## **EOR**

Once natural reservoir drive diminishes towards the end of the primary recovery stage of an oil well, secondary recovery methods are applied. These methods include injecting fluids, typically water, to increase reservoir pressure. Deployment of secondary recovery methods have sustained oil production of marginal (low production) wells across Montana. While this secondary EOR can be successful it still leaves a large volume of stranded oil in place.

Carbon dioxide enhanced oil recovery is a process in which compressed CO<sub>2</sub> is injected into mature oil reservoirs to recover these otherwise stranded reserves. Using CO<sub>2</sub> EOR, also known as tertiary recovery, a considerably greater percent of a reservoir's original oil can be extracted, compared to only primary and secondary recovery.

To date, CO<sub>2</sub> EOR operations deployed by Denbury Resources have resulted in the gross production of over 155 million barrels of otherwise stranded oil.

## **Benefits**

In addition to the economic benefits directly related to enhanced oil recovery, including increased royalty revenue to mineral owners, additional severance and ad valorem tax revenues to the state and local governments and job growth that benefits local economies, this EOR process also yields many environmental benefits.

CO<sub>2</sub> EOR operations provide a responsible method of utilizing CO<sub>2</sub>, including underground storage of otherwise emitted sources of CO<sub>2</sub> into the atmosphere. Because of the enhanced recovery capability of this method, there is also the benefit of less wasted oil reserves, those which would remain trapped without a source of recovery.

## **Conclusion**

Montana continues to experience record low oil and natural gas activity. Wells currently in production will continue to taper off, reducing their economic contribution without viable methods of EOR and/or new wells coming into production.

MPA supports the construction of the CCA Pipeline in accordance with state, local, and federal safety and environmental requirements, because of its positive economic contributions, especially to those of Powder River, Carter and Fallon Counties, and the environmental benefits the Pipeline will produce in Montana.

We encourage the Bureau of Land Management to promptly move forward with its permitting responsibilities.

Best regards,



Alan Olson  
Executive Director

cc: Greg Schnacke, Denbury Resources  
Mark Baker, representing Denbury Resources

# MONTANA TAXPAYERS



Bob Story, Executive Director

506 North Lamborn

Helena, MT 59601

(406) 442-2130 --- (406-6233) - cell

rstory@montax.org

October 24, 2017

OCT 24 2017

Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, Montana 59301-7000

Attn: Irma Nansel

Dear Ms. Nansel:

On behalf of the Montana Taxpayers Association (MonTax) and its 300 plus members, I am submitting comments in support of the proposed Denbury Green Pipeline-Montana LLC project. This project will benefit Montana and should be approved quickly.

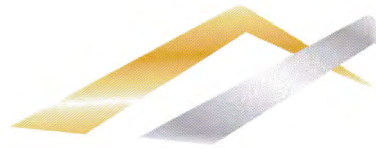
MonTax supports the development of this pipeline for the primary purpose of initiating Carbon Dioxide Enhanced Oil Recovery (CO<sub>2</sub> EOR) in the Cedar Creek Anticline in Fallon County, Montana. Furthermore, this project strengthens the Montana economy: it provides good paying jobs; invests in a large capital project; increases property tax income to Montana, its local governments and schools; and increases oil production in our state which will generate production tax revenue.

Denbury Onshore, LLC is a responsible business citizen of Montana and member of our organization. The company has invested millions of dollars into the oil and gas production infrastructure in Montana and we are excited to see this long awaited project move forward and encourage the BLM to proceed in their permitting process.

Sincerely,

A handwritten signature in black ink that reads "Bob Story". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bob Story  
Executive Director



**TREASURE STATE**  
RESOURCES ASSOCIATION  
OF MONTANA

P.O. Box 1700  
Helena, Montana 59624

October 26, 2017

Bureau of Land Management  
Attn. Irma Nansel  
111 Garryowen Road  
Miles City, Montana 59301-7000  
RE: Proposed Cedar Creek Anticline Project (Denbury Green Pipeline)

Dear Ms. Nansel:

The Bureau of Land Management has requested input on the proposed Cedar Creek Anticline Project. The Treasure State Resources Association (TSRA) would like to offer the following comments:

TSRA is a coalition representing a broad cross section of Montana's economy, including many of the natural resource industries, organized labor interests and general business. We also represent over twenty other trade and membership associations ranging from agricultural interests to rural education. Our Mission is to promote and enhance the Montana Way of Life through responsible resource development. We are proud to support the efforts of Denbury Resources to bring more jobs to our state and promote healthy communities, especially those in Eastern Montana who face significant economic challenges.

The State of Montana, the Bureau of Land Management and other federal agencies have a well-established regulatory process for managing development of our natural resources. The stringent legal and regulatory requirements that guide all resource activities allow projects such as that proposed by Denbury to proceed to the permitting process with the assurance that activities will be carried out in an environmentally sound manner. That is further affirmed by Denbury Resources' already well-established record as a responsible company and a "good neighbor" in Montana.

As noted earlier, the project will provide new, high wage jobs – something Montana's economy desperately needs. It will also offer environmental benefits by bringing new investment in

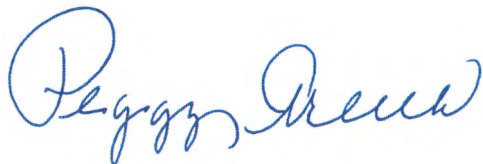
TSRA Comments

Page 2

enhanced oil recovery in the area. It also brings more tax revenue to the counties and to the state. Given all these factors, it would be our request that the BLM move forward expeditiously with the permitting process for the CCA.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Peggy Trenk". The signature is written in a cursive style with a large initial "P".

Peggy Trenk, Executive Director

Treasure State Resources Association



NOV 2017

Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, MT 59301-7000

November 2, 2017

Ms. Irma Nansel,

On behalf of the Montana Association of Oil, Gas, and Coal Counties and its 34 member counties, I am writing to encourage the Bureau of Land Management to conduct its permitting process in a fair, equitable, and expeditious manner when considering the proposed Cedar Creek Anticline Pipeline and Enhanced Oil Recovery (EOR) Project.

The projects, proposed by Denbury Green Pipeline-Montana, LLC., would create new, high-paying jobs and be a boon to the local economies of Powder River, Carter, and Fallon counties. Additionally, the tax revenue generated by the 250 mile long pipeline and Enhanced Oil Recovery project will help fund critical services for local communities, while simultaneously providing much needed revenue to the state for schools and infrastructure.

Utilization of CO<sub>2</sub> in enhanced oil recovery is not only environmentally safe, but allows for the extraction of approximately 20% more oil from a reserve than would otherwise be accessible. The tax revenue generated by the recovery of these additional resources, combined with the substantial financial investment that is required to implement and operate an EOR project such as this, makes the Cedar Creek Anticline Pipeline an invaluable opportunity for the people of Montana.

Denbury has an impeccable record of operating in a safe and responsible manner. They have always worked cooperatively with state and local governments and we look forward to working with them on this project.

Thank you for your time and consideration.

Respectfully,

*by Jim Metzger for*  
Richard Dunbar, Phillips County Commissioner

President, Montana Association of Oil, Gas, and Coal Counties



# MONTANA TAXPAYERS



Bob Story, Executive Director

506 North Lamborn

Helena, MT 59601

(406) 442-2130 --- (406-6233) - cell

rstory@montax.org

October 24, 2017

OCT 24 2017

Bureau of Land Management  
Miles City Field Office  
111 Garryowen Road  
Miles City, Montana 59301-7000

Attn: Irma Nansel

Dear Ms. Nansel:

On behalf of the Montana Taxpayers Association (MonTax) and its 300 plus members, I am submitting comments in support of the proposed Denbury Green Pipeline-Montana LLC project. This project will benefit Montana and should be approved quickly.

MonTax supports the development of this pipeline for the primary purpose of initiating Carbon Dioxide Enhanced Oil Recovery (CO<sub>2</sub> EOR) in the Cedar Creek Anticline in Fallon County, Montana. Furthermore, this project strengthens the Montana economy: it provides good paying jobs; invests in a large capital project; increases property tax income to Montana, its local governments and schools; and increases oil production in our state which will generate production tax revenue.

Denbury Onshore, LLC is a responsible business citizen of Montana and member of our organization. The company has invested millions of dollars into the oil and gas production infrastructure in Montana and we are excited to see this long awaited project move forward and encourage the BLM to proceed in their permitting process.

Sincerely,

A handwritten signature in black ink that reads "Bob Story". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bob Story  
Executive Director



WBI ENERGY TRANSMISSION, INC.  
1250 West Century Avenue  
Mailing Address:  
PO Box 5601  
Bismarck, ND 58506-5601  
(701) 530-1600  
www.wbienergy.com

November 2, 2017

NOV 2017

Bureau of Land Management  
Miles City Field Office  
Attention: Irma Nansel  
111 Garryowen Road  
Miles City, MT 59301-7000

Re: MTC023/022

In response to the Bureau of Land Management's (BLM) October 4, 2017 notification of the National Environmental Policy Act 30-day scoping period regarding Denbury Resources, Inc.'s (Denbury) Plans of Development for a 110-mile carbon dioxide (CO<sub>2</sub>) pipeline and an Enhanced Oil Recovery (EOR) development project (Projects), WBI Energy Transmission, Inc. (WBI Energy) respectfully submits the following comments.

WBI Energy is an interstate natural gas transmission pipeline company currently operating approximately 4,000 miles of pipelines spanning major portions of North Dakota, South Dakota, Montana, and Wyoming. WBI Energy also operates three underground natural gas storage fields in Montana and Wyoming that provide natural gas storage service to local distribution companies, producers, natural gas marketers and others. One of WBI Energy's underground natural gas storage fields, the Baker Storage Field, is located in Fallon County within the area of impact of Denbury's Projects. The operation of the Baker Storage Field will be directly impacted by Denbury's proposed projects.

The Baker Storage Field is a depleted natural gas field which was converted to storage operations beginning in 1945. The field has been in continual storage operations since conversion. The storage reservoir is a low pressure reservoir with a maximum pressure of 280 psig, but typically operates at much lower pressures. The storage reservoir is in the Judith River formation at depths ranging from 800 to 1,300 feet below the surface. WBI Energy currently operates 191 storage wells in the field. WBI Energy estimates that there are 2,000 wells which penetrate the storage reservoir, of which approximately 330 are abandoned.

WBI Energy's Baker storage field, as well as its other storage and transmission facilities, are certificated under the jurisdiction of the Federal Energy Regulatory Commission (FERC). The gas injected and stored in the Baker Storage Field is of pipeline quality; i.e., it is required to meet the gas quality specifications of WBI Energy and other interstate natural gas pipelines. WBI Energy's gas quality specifications are included in Section 4 Quality of WBI Energy's FERC Gas Tariff, Third Revised Volume No. 1 (Tariff). As specified in WBI Energy's Tariff, the maximum allowable content of CO<sub>2</sub> is two percent (2%) by volume.

In order to continue use of the Baker Storage Field, it is imperative that the natural gas in the storage reservoir not be contaminated with fugitive CO<sub>2</sub> from Denbury's proposed EOR project.

In addition to the Baker Storage Field, within the area of impact of Denbury's Projects, WBI Energy operates a natural gas gathering system which collects gas produced from the Eagle formation. The Eagle formation, at a depth of 1,300 feet to 2,000 feet, is located between WBI Energy's storage reservoir and Denbury's producing formations. Contamination of the natural gas in the Eagle Formation will render it unacceptable to WBI Energy unless costly gas processing is installed to remove fugitive CO<sub>2</sub>. The additional cost of gas processing will likely make it uneconomical to produce natural gas from the Eagle formation.

A successful EOR project will require the cooperation of all operators in the field. A robust risk management plan must be developed to ensure success; well evaluation, mechanical integrity testing, well logging, leak detection and monitoring wells will be vital components of this plan. The risk management plan must not only include the wells used for the injection of CO<sub>2</sub>, but also all production and monitoring wells and all wells that penetrate any formation in which CO<sub>2</sub> is injected. All possible conduits of CO<sub>2</sub> flow must be evaluated, including geological faulting and the possibility of behind casing flow. Containment of the injected CO<sub>2</sub> and all other reservoir fluids is paramount in the success of this or any EOR project.

WBI Energy appreciates the BLM's consideration of these comments. We support responsible development of our nation's natural resources and look forward to working with Denbury to ensure the success of their project. If you have any questions, please contact me at (701) 530-1557.

Respectfully submitted,



Mark Baerlocher  
System Planning Manager  
WBI Energy Transmission, Inc.

cc: Mr. Jim Halvorson – Montana Board of Oil and Gas Conservation  
Mr. Marshall Dempsey – Scout Energy Partners

## BLM ePlanning Website Individual Comments

MTDENBURYSC-1-66332	Undefined	IN FAVOR OF PIPELINE GRASS IS SO MUCH BETTER OVER PIPELINE
MTDENBURYSC-1-66382	Support CO2 pipeline proposal	I fully support the CO2 pipeline proposed between the Bell Creek and the Cedar Creek Anticline oil fields. If completed this project will benefit the nation, the state of Montana, and the rural communities of eastern Montana. CO2 injection is a proven and cost-effective method for recovering additional oil. I hope the BLM will support and encourage the completion of this project.
MTDENBURYSC-1-66432	Denbury CO2 Letter of Support	Fallon County letter of support attached. Hard copy to be mailed.
MTDENBURYSC-1-66634	DOI-BLM-MT-CO20-2017-0081-EA	Please accept the Attached comments regarding Denbury Resources CCA project. Thank you for your consideration.  Peggy Trenk, Treasure State Resources Association, P.O. Box 1700, Helena, MT 59624