

3.0 ALTERNATIVES

In accordance with NEPA and Commission policy, we identified and evaluated alternatives to each of the components of the Rockies Western Phase Project (*i.e.*, the REX-West Project, the Blanco to Meeker Project, and the Wamsutter Expansion Project) to determine whether an alternative would be reasonable and environmentally preferable to the proposed action. These alternatives included the No Action and Postponed Action alternatives, system alternatives, major route alternatives, route variations, and aboveground facility site alternatives. The analysis of alternatives is based on information provided by the Applicants and our review of aerial photographs, U.S. Geological Service (USGS) topographic maps, other publicly available information, and site visits. We have also addressed alternatives identified during the public scoping periods for the projects. The evaluation criteria for selecting potentially environmentally preferable alternatives are:

- technical and economic feasibility and practicality;
- significant environmental advantage over the proposed project; and
- ability to meet the overall project objective of transporting up to 1.5 bcf per day of natural gas produced in the Rocky Mountain and San Juan basins for delivery to major markets in the Midwest and eastern United States through interconnections with existing interstate natural gas pipeline systems.

With respect to the first criterion, it is important to recognize that not all conceivable alternatives are technically and economically feasible and practical. Some alternatives may be impracticable because they are unavailable and/or incapable of being implemented after taking into consideration costs, existing technologies, and logistics in light of the overall project purpose. In conducting a reasonable analysis, it is also important to consider the environmental advantages and disadvantages of the proposed action and to focus the analysis on those alternatives that may reduce impacts and/or offer a significant environmental advantage.

Through the application of evaluation criteria and subsequent environmental comparisons, each alternative was considered to a point where it was clear if the alternative could or could not meet the evaluation criteria. Those alternatives that meet the project objective and appear to be the most reasonable with less than or similar levels of environmental impact are reviewed in the greatest detail.

3.1 NO ACTION ALTERNATIVE

The Commission has three alternative courses of action in processing applications under Section 7 of the NGA. It may: 1) deny the requested authorizations; 2) postpone action pending further filings or study; or 3) grant the authorizations with or without conditions. In this EIS, we evaluate the environmental impacts from three separate applications, which together would result in new pipeline infrastructure that would transport natural gas from the Rocky Mountain basin to markets in the Midwest and East. Before evaluating the No Action and Postponed Action Alternatives for each separate application, we first considered these alternatives for the Rockies Western Phase Project as a whole.

Forecasts by the Energy Information Association predict that 60 percent of the projected growth in domestic natural gas consumption through 2030 will occur east of the Mississippi River, while the Rocky Mountain and Alaskan regions will provide most of the increase in domestic production (Energy Information Administration, 2006). Denial or postponement of the proposed action would mean that the environmental impacts discussed in this EIS would not occur or would be delayed. However, the project objective of delivering natural gas from the supply regions in the west to meet the increasing demand in the Midwest and eastern United States would not be met.

While the increasing demand for energy could be met by other projects or alternatives, it is purely speculative to predict the resulting effects and actions that could be taken by local governments and other suppliers or users of natural gas in the region as well as any associated direct and indirect environmental impacts. In addition, each of these may have an environmental impact that is less than, equal to, or greater than the currently proposed Rockies Western Phase Project. Denying authorization of the Project could also result in more expensive and less reliable natural gas supplies for the end users and/or greater reliance on alternative fossil fuels, such as coal or fuel oil. Increased use of alternative fossil fuels would likely result in greater emissions compared to natural gas. Therefore, for the Project as a whole, we conclude that the No Action and Postponed Action Alternatives are not preferable to the proposed action.

The No Action alternative for the BLM would result in the BLM denying the pending Right-of-Way Grant applications filed by Rockies Express, Overthrust, and TransColorado. This would not preclude the Applicants from modifying their applications and re-filing a new application at a later date.

Having considered the No Action and Postponed Action Alternatives for the Project as a whole, we next consider the effects denying or postponing the individual applications.

3.1.1 Rockies Express

Under the No Action Alternative for the REX-West Project, the Commission would not issue a Certificate to Rockies Express, and the REX-West facilities would not be constructed. In addition, because TransColorado's and Overthrust's facilities would supply REX-West with natural gas (see sections 3.1.2 and 3.1.3) these applications would also likely be denied. The Postponed Action Alternative would delay the construction of the new energy infrastructure facilities proposed by Rockies Express until some later undetermined date. If the Commission denies or postpones Rockies Express' application, the environmental impacts described for the REX-West Project in this EIS would not occur. However, the project objectives would not be met and supplies of natural gas in the Rocky Mountain-producing region would largely remain in that region with just the current limited infrastructure to transport these supplies eastward. While other projects or alternatives could be developed to meet this need, it is speculative to predict the resulting effects and actions that could be taken by local governments and other suppliers or users of natural gas in the region as well as any associated direct and indirect environmental impacts. In addition, each of these may have an environmental impact that is equal to or greater than the currently proposed project.

Denying authorization of the REX-West Project could also result in more expensive and less reliable natural gas supplies for the end users and/or greater reliance on alternative fossil fuels, such as coal or fuel oil. Increased use of alternative fossil fuels would likely result in greater emissions compared to natural gas.

Consequences of the No Action or Postponed Action Alternative could include the curtailment of production and delivery from wells in the Rocky Mountain basin areas due to insufficient pipeline capacity; loss of competition in the transportation services market; loss of gas supplies for Rockies Express customers at proposed delivery points; and greater dependency on storage, foreign gas supply sources, and other energy alternatives. We conclude that the No Action and Postponed Action Alternatives are not preferable to Rockies Express' proposed action.

3.1.2 TransColorado

Under the No Action or Postponed Action Alternative for the Blanco to Meeker Project, the Commission would not issue, or would delay issuing, the Certificate requested by TransColorado, and TransColorado would not expand its transportation capacity. Under these alternatives, TransColorado

would not be able to meet its customers' demonstrated need for additional capacity to support the additional gas supplies being developed in the Rocky Mountain region.

Should the Commission choose not to issue, or to delay issuing, a Certificate to TransColorado for the Blanco to Meeker Project, the TransColorado facilities would not be constructed, or construction would be delayed, and the environmental impacts identified in this EIS associated with the construction and operation of the project would not occur. However, the project objectives would not be met. Denial or postponement of TransColorado's application would not likely result in the denial or postponement of the other two applications, which might be able to be redesigned to meet the objectives of the Rockies Western Phase Project. Whether or not this could happen in a timely manner is speculative at this point. If it were possible, there would be some delay before the supplies anticipated from TransColorado's proposed facilities could be supplied through other means, which could result in equal or greater environmental impact compared to the proposed action. Additionally, the No Action Alternative for the Blanco to Meeker Project would likely result in continued operation of the existing pipeline system taking a portion of the increased gas production in the Piceance Basin southward. We conclude that the No Action and Postponed Action Alternatives are not preferable to the proposed action by TransColorado.

3.1.3 Overthrust

Under the No Action or Postponed Action Alternative for the Wamsutter Expansion Project, the Commission would not issue, or would delay issuing, the Certificate requested by Overthrust, and Overthrust would not construct the Wamsutter Expansion Project. Producers that are currently drilling and developing gas supplies in Overthrust's service areas would be limited to existing pipeline capacity, leaving them potentially unable to transport their supplies to market. If the Commission were to approve the REX-West Project, but not the Wamsutter Expansion Project, then Overthrust's contractual agreement to supply the REX-West Project with natural gas could not be met, and Rockies Express could decide to postpone construction of its facilities until gas supplies could be guaranteed from other sources.

Should the Commission choose not to issue, or to delay issuing, a Certificate to Overthrust for the Wamsutter Expansion Project, the Overthrust facilities would not be constructed, or construction would be delayed, and the identified environmental impacts associated with the Overthrust facilities would not occur. However, the project objectives would not be met. Denial or postponement of Overthrust's application would not likely result in the denial or postponement of the other two applications, which might be able to be redesigned to meet the objectives of the Rockies Western Phase Project. Whether or not this could happen in a timely manner is speculative at this point. If it were possible, there would be some delay before the supplies anticipated from Overthrust's proposed facilities could be supplied through other means, which could result in equal or greater environmental impact compared to the proposed action. We conclude that the No Action and Postponed Action Alternatives are not preferable to the proposed action by Overthrust.

3.2 SYSTEM ALTERNATIVES

System alternatives are alternatives to a proposed action that would make use of other existing, modified, or proposed transmission systems to meet the stated objectives of the project. A system alternative would make it unnecessary to construct all or part of a proposed project, although some modifications or additions to another pipeline system may be required to increase its capacity, or another entirely new system may need to be constructed. Such modifications or additions would result in environmental impact; however, the impact of the system alternative could be less than, similar to, or greater than that associated with construction of the proposed project.

3.2.1 Rockies Express

A system alternative for the REX-West Project would transport large volumes of natural gas from the Rocky Mountain basins directly to markets in the Midwest and into other pipeline systems that could deliver the natural gas eastward. Currently, there are no existing pipeline systems that could take the REX-West proposed volumes of Rocky Mountain gas supply directly eastward. Further, we are unaware of any existing pipeline systems that have expansion plans that could meet the purpose and need of the REX-West Project. Therefore, the use of existing pipeline systems is not a viable alternative.

3.2.2 TransColorado

The purpose of TransColorado's Blanco to Meeker Expansion Project is to transport gas from the Blanco Hub area to the Meeker Hub. TransColorado's proposal to reverse the flow in the existing TransColorado pipeline represents an efficient means to accomplish this objective without the environmental impacts associated with constructing new pipeline facilities. We conclude that a system alternative to TransColorado's proposed action would not be environmentally advantageous.

3.2.3 Overthrust

Of the existing pipelines adjacent to and in the vicinity of Overthrust proposed route (*e.g.*, Questar, Kern River, Wyoming Interstate Company, and Northwest), none have the capacity to transport the additional 750,000 Dth/d of natural gas to the Rockies Express system, as proposed for the Wamsutter Expansion Project. To transport this amount of natural gas on one of the existing interstate pipeline systems in the Wamsutter Expansion Project area, capacity on one of these systems would need to become available through expansion or some other means. Depending on the diameters of an existing pipeline system in the area, transport of Overthrust's remaining volumes could require either additional looping and additional compression on multiple systems, or looping one system in its entirety. While these options might disperse or shift the associated environmental impacts, it is unlikely that they would substantially reduce impacts when compared to the Wamsutter Expansion Project. Expanding an existing pipeline system would likely require an equivalent amount of pipeline as proposed by Overthrust in order to meet the project objective of making gas deliveries to Rockies Express. We do not believe that constructing additional pipeline (whether looping or not) would present an environmental advantage over the proposed project, as Overthrust's proposed route is already collocated with other utilities for the majority of its length and as such, minimizes environmental impacts.

3.3 MAJOR ROUTE ALTERNATIVES

Route alternatives are identified to determine if impacts could be avoided or reduced on environmentally sensitive resources, such as population centers, recreation and designated scenic areas, and wildlife and natural habitat management areas that would be crossed by a proposed pipeline. Route alternatives are also identified in an attempt to minimize the creation of new rights-of-way by routing pipelines adjacent to existing utility rights-of-way. Collocation of facilities is a generally accepted practice as a means to control the location of development and limit impacts on sensitive resources by keeping disturbance within established corridors. While the origin and delivery points of route alternatives are generally the same as for the corresponding segment of a proposed pipeline, the route alternatives could follow significantly different alignments.

3.3.1 Rockies Express

3.3.1.1 Railroad Corridors

We received comments suggesting that the proposed REX-West pipeline could utilize portions of abandoned railroad corridors as possible route alternatives. Rockies Express indicated that the use of abandoned railroad corridors as potential route alternatives was not feasible since market delivery points are not situated along these corridors. In addition, easement acquisition along abandoned railroad corridors would be difficult due to different ownership conditions/status for specific rail systems, as well as other factors. Some of the difficulties associated with acquiring rights to abandoned rail routes include the following:

- determination of ownership can be problematic as rail company rights for abandoned routes were granted by easement, option, or government (state, federal, local) before 1900;
- many of the original rail companies are no longer in business or in the name that the original grants were made and there is no clear trail as to the currently operating rail company which may control those lands;
- warranting title or recording inter-company transfers of ownership is often neglected by rail companies;
- in some cases, the original agreements allowed for the lands to revert to the adjacent landowners if the rail routes are abandoned, and records are often incomplete or there may be no record of the reversion;
- in some cases, the rail companies in control of the lines when abandoned have granted the lands to conservancy organizations for nature trails, bike trails, county park authorities, etc., and these transfers may or may not be of public record; and
- in some cases, records indicating current control of the rail companies that legally control the abandoned routes have not been adequately maintained, and rail companies may not be willing to take the time to research their own records to inform others as to who controls the lands.

Our review of this information indicates that while there may be portions of abandoned railroad corridors that could be pieced together to provide a portion of the REX-West pipeline route, there does not appear to be any corridors of significant length in the project area that would provide access to the market delivery points proposed by Rockies Express. Consequently, lateral pipelines would need to be built to connect the pipeline to the delivery points. These laterals would add environmental impact and could affect numerous additional landowners. Further, the potential ownership issues arising from the historic development of the railroad systems could delay development of the project. Because of these considerations, and because the proposed route would utilize an existing utility corridor for the majority of its length, we do not consider the use of abandoned railroad corridors to be a viable alternative.

3.3.1.2 Northern Route Alternative

During its initial REX-West route planning, Rockies Express conducted a preliminary environmental review of a conceptual pipeline route between a point in Gosper County, Nebraska (south-central Nebraska, approximate MP 260) and a location due east near Springfield, Illinois. Additional development of the REX-West Project design determined that the terminus of the project would be located in Audrain County, Missouri. Thus, we cannot evaluate direct comparison of the alternative to the proposed action (with different endpoints in two different states). Therefore, we have conducted a preliminary evaluation based on available mapping and public data sources of a *conceptual* route alternative, referred to here as the “Northern Route Alternative” (figure 3.3-1).

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Figure 3.3-1
Northern Route Alternative

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This allows us to consider an alternative route with the same delivery endpoint as the proposed action. Thus, the Northern Route Alternative would begin at approximate MP 260 and end at the proposed REX-West terminus in Audrain County, Missouri, at MP 712.7.

The Northern Route Alternative would deviate from the currently proposed REX-West route at about MP 260 and follow a generally eastern direction across southern Nebraska, crossing into northern Missouri, and extending to a location in Lewis County, Missouri. At this point, the Northern Route Alternative would need to turn south and continue for about 60 miles to Audrain County, where it would interconnect with the Panhandle Eastern pipeline system at the proposed REX-West terminus at MP 712.7.

Our review of this conceptual Northern Route Alternative indicates that it would be approximately 31 miles longer than the corresponding segment of the proposed route and require establishment of an entirely new utility corridor, whereas the corresponding segment of the proposed route would be collocated for its entire length along existing pipeline rights-of-way. In addition, while the proposed route would cross multiple public lands and recreation areas (see table 4.8.3), including a small area of the FWS-managed Frerichs WPA in Kearney County, Nebraska, the Northern Route Alternative would also cross public land areas designated for preservation and recreation, including Mark Twain State Park, Coryell State Park, and Johnson Lake State Park. Additional regional reroutes along the Northern Route Alternative could be required to avoid these and other sensitive areas, increasing the overall land requirements and associated impacts for this alternative. These reroutes could add additional length to the pipeline and result in additional greenfield construction to avoid specific resource areas.

Finally, the Northern Route Alternative would be located away from four of the proposed market delivery points identified by Rockies Express at interconnects with existing pipelines. Construction of significant lateral pipeline facilities would be required to provide gas delivery service to these locations, further increasing the impacts associated with this alternative. Because no major environmental resource impacts have been identified along the portion of the proposed route from about MP 260 to MP 712.7 that would be avoided by the adoption of this alternative, and the Northern Route Alternative would not meet the stated purpose of the REX-West Project without the construction of lateral pipelines to provide service to designated market delivery points along the proposed route, we do not find a significant environmental advantage associated with the Northern Route Alternative and do not recommend that this alternative be incorporated into the REX-West Project.

3.3.1.3 Platte Route Alternative

The proposed REX-West pipeline route would parallel the existing Trailblazer pipeline from its origin at MP 0.0 in Weld County, Colorado to about MP 258.9 where the REX-West route turns south and joins the existing Platte Pipeline corridor. Rockies Express identified an additional alternative (Platte Route Alternative) that would join the Platte Pipeline corridor at about MP 219.8, about 39 miles west of the proposed merge at MP 258.9 as currently proposed (see figure 3.3-2).

The Platte Route Alternative would begin at the intersection of the proposed REX-West route and the Platte Pipeline at a location about 5 miles north of Wellfleet, Nebraska. At this location, the pipeline would turn to the southeast and parallel the existing Platte Pipeline corridor for about 12.5 miles where it would cross into Frontier County, Nebraska, and turn to the east for about 32.5 miles to rejoin the proposed route at about MP 258.9 near Eustis, Nebraska.

Table 3.3.1-1 presents a comparison of the significant environmental features of this alternative and the corresponding segment of the proposed route.

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Figure 3.3-2
Platte Route Alternative

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Environmental Factor	Unit	Corresponding Segment of Proposed Route	Platte Route Alternative
Total length	Miles	39.1	45.0
Adjacent to existing pipeline right-of-way	Percent	97	100
Designated resource areas	Number	0	0
Agricultural land	Miles	14.0	23.2
Major river crossings (>100 feet wide)	Number	0	0
Wetland crossing	Feet	1,156	3,000 (approx.)

Our review of the Platte Route Alternative indicates that it would be approximately 5.9 miles, or 15 percent, longer, would cross an additional 1,844 feet of wetlands (affecting about 4.4 more acres during construction), and cross an additional 9.2 miles of agricultural land (affecting approximately 139 more acres during construction). Because the Platte Route Alternative would be longer and affect additional lands compared to the corresponding segment of the proposed route, and there are no significant environmental resources that would be avoided by the alternative routing, we conclude that there is no significant environmental advantage to the Platte Route Alternative. Therefore, we do not recommend that this alternative be incorporated into the proposed REX-West Project.

3.3.1.4 Echo Springs Lateral

The route of the proposed Echo Springs Lateral pipeline through Sweetwater and Carbon Counties, Wyoming is constrained by its purpose of delivering natural gas from the Rockies Express Echo Springs Compressor Station to the existing Echo Springs Processing Plant. The location of the Echo Springs Compressor Station was chosen due to the hydraulic requirements of the existing nearby Wamsutter Compressor Station. The proposed route for the Echo Springs Lateral would be collocated with existing pipeline utility corridors along its entire length. Rockies Express considered one alternate route for the pipeline based on a preliminary location for the Echo Springs Compressor Station; however, this route was dropped based on the final proposed compressor station location. No route alternative that might reduce environmental impact was identified for this facility during development of the REX-West Project.

3.3.2 TransColorado

TransColorado's proposed Blanco to Meeker Project would require the relocation of a section of pipeline to gain access to the new compression facilities proposed at the Blanco Hub. TransColorado proposes to install, in parallel, approximately 392 feet of discharge line and 478 feet of suction line to connect the proposed Blanco Compressor Station with a new MLV on TransColorado's existing pipeline system. In addition, TransColorado would construct a 1,300-foot-long receipt pipeline to connect the proposed Blanco Compressor Station with the Conoco Gas Plant and a 60-foot-long tie-in pipeline from the receipt pipeline to a new meter station. The locations of these facilities are constrained by the location of the existing TransColorado mainline and the requested tie-in point for the Conoco Gas Plant. Therefore, no viable alternatives were identified or evaluated for these pipeline facilities.

3.3.3 Overthrust

3.3.3.1 Rock Springs Alternative

Overthrust identified a route alternative that would avoid the City of Rock Springs, Wyoming between approximate MP^{OT} 0.0 and 16.0 (figure 3.3-3). Specifically, this route alternative would begin at MP^{OT} 0.0 and proceed along the western and northern edges of Rock Springs, and then rejoin the proposed route at about MP^{OT} 16.0. Generally, this route alternative would be similar to the corresponding segment of the proposed route in overall length, land use, land ownership, and environmental impact. The Rock Springs Alternative would be approximately 0.3 mile shorter than the corresponding segment of the proposed route, but would cross about 0.2 acre more wetland (table 3.3.3-1).

Environmental Factor	Unit	Corresponding Segment of Proposed Route	Rock Springs Route Alternative
Length	Miles	16.0	15.7
Existing structures within 50 feet	Number	0	0
Planned residential developments	Number	0	2
Wetland crossing	Feet	0	113
Perennial waterbody crossings	Number	1	1
Private land crossed	Miles	0.0	1.2

Our review indicates that the Rock Springs Alternative would require construction through areas on the northwestern side of the city, which is currently experiencing an increase in residential development, with additional development planned. The corresponding segment of the proposed route would avoid construction near this growing residential area, remains on BLM land the entire distance, and would not cross any wetlands. Because we have not identified a significant environmental advantage associated with the Rock Springs Alternative, we do not recommend that it be incorporated into the Wamsutter Expansion Project.

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Figure 3.3-3
Rock Springs Alternative

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3.4 ROUTE VARIATIONS

Route variations differ from system alternatives or route alternatives in that they are identified to reduce impacts on specific localized features, are typically shorter in length than route alternatives, and do not always clearly display an environmental advantage other than reducing or avoiding impacts on specific features. We note that while the proposed Rockies Express pipeline route would parallel an existing utility corridor for much of its length, the existing corridor was developed approximately 20 years ago (Trailblazer gas pipeline) or 50 years ago (Platte oil pipeline). Thus, some of the typical benefits of collocation (*e.g.*, reduced clearing, less disruption of soil horizons, avoidance of structures, etc.) are reduced when compared construction adjacent to newer, actively maintained corridors.

3.4.1 Rockies Express

Rockies Express evaluated several minor route variations during the Pre-Filing Process and during the development of the pipeline route (see section 1.3.3). Those providing environmental or constructability advantages were incorporated into the proposed route. Additional route variations are discussed below.

3.4.1.1 Chalk Bluffs Route Variation (MPs 0.1 to 17.7)

The Legacy Land Trust identified lands that would be crossed by the proposed REX-West pipeline in Weld County, Colorado, between about MPs 1.0 and 15.1 across the Eagle Rock Ranch near the Chalk Bluffs. Rockies Express proposes to parallel the existing Trailblazer pipeline in this area; however, the Legacy Land Trust indicated that this area provides important nesting and roosting habitat for a number of bird species and may contain archeological or other cultural resources. The Legacy Land Trust requested that alternatives be considered to minimize impacts on these resources and stated that conservation easements exist on the Eagle Rock Ranch that have been adversely affected by the presence of the Trailblazer pipeline.

Rockies Express stated that the Legacy Land Trust originally suggested a southern route variation that would avoid crossing Legacy Land Trust property. During September 2006, Rockies Express received approval from the Legacy Land Trust to conduct an environmental and engineering review of a route variation in the Chalk Bluffs area. In its comments on the draft EIS, Rockies Express provided an analysis of a potential route variation in the Chalk Bluffs area based on this field and desktop evaluation (figure 3.4-1).

The Chalk Bluffs Route Variation would deviate from the proposed corridor at about MP 0.1 and turn to the southeast for about 6 miles. At that point, the variation would turn due east, entering the Pawnee National Grasslands at about MP 6.7, continue east for 2 miles, and then turn to the northeast leaving the Pawnee Grasslands at about MP 10.4. The route variation would continue in a generally northeast direction on the south side of the Chalk Bluffs for an additional 8 miles and rejoin the proposed route at MP 17.7.

Table 3.4.1-1 provides a comparison of the proposed route and Rockies Express' Chalk Bluffs Route Variation. As shown, the route variation would be about 0.7 mile longer, and affect about 17.2 acres more land than the corresponding segment of the proposed route. Further, the proposed route would be entirely collocated with an existing utility corridor, minimizing the disruption of previously undisturbed lands, including nearly 4 miles of the Pawnee National Grasslands.

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Figure 3.4-1
Chalk Bluffs Variation

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The proposed route would affect 4 more stream crossings and about 1.3 more acres of wetlands as compared to the route variation. Based on our analysis of the two routes, we find that the Chalk Bluffs Route Variation would create a new utility corridor affecting previously undisturbed lands within the Pawnee National Grasslands and does not result in a significant environmental advantage over the corresponding segment of the proposed route. Therefore we do not recommend that the Chalk Bluffs Route Variation be incorporated into the REX-West Project.

Environmental Factor	Unit	Chalk Bluffs Variation	Corresponding Segment of Proposed Route
Total length	Miles	18.44	17.74
Adjacent to existing pipeline right-of-way	Percent	46	100
Total land affected by construction	Acres	285.92	268.72
Stream crossings	Number	21	17
Wetland crossings	Acres	3.47	2.19

3.4.1.2 Barker Route Variation (MPs 299.4 to 300.3)

At the public comment meeting in Beatrice, Nebraska, a landowner (Andrea Barker) identified concerns regarding the proposed Rockies Express pipeline route in the area near MP 300 in Phelps County, Nebraska. Rockies Express' proposed route deviates from an existing Platte oil/products pipeline in this area to avoid the existing Platte Pipeline Holdrege Station and a series of oil storage tanks. Ms. Barker's residence is adjacent to several of these tanks.

Specifically, Ms. Barker indicated that the currently proposed route, located on the north side of her residence on the abutting property, in conjunction with the existing Platte Pipeline corridor located south of her property and the tanks on the west side, would result in pipeline facilities on all sides of the residence, though not on her property. Rockies Express' proposed route would be about 125 feet from the Barker residence.

In response to our data request, Rockies Express identified a possible route variation in this location that would deviate from the proposed route along the existing Platte Pipeline corridor at about MP 299.4, cross under the Platte Pipeline and then turn to the southeast on a newly created right-of-way for about 1,200 feet. At this point, the variation would turn due east for about 1.5 miles, cross under the Platte Pipeline again and rejoin the proposed route at MP 300.3. Figure 3.4-2 shows the location of the Barker Route Variation.

Table 3.4.1-2 provides a comparison of the significant environmental characteristics of the Barker Route Variation and the corresponding segment of the proposed route. As shown, the Barker Route Variation would be about 0.07 mile longer and impact an additional 0.69 acre of land. Neither route would be collocated with an existing pipeline or utility corridor in this area.

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Figure 3.4-2
Barker Route Variation

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TABLE 3.4.1-2			
Barker Route Variation Comparison			
Environmental Factor	Unit	Barker Route Variation	Corresponding Segment of Proposed Route
Total length	Miles	0.96	0.89
Adjacent to existing pipeline right-of-way	Percent	0	0
Total land affected by construction	Acres	14.63	13.94
Stream crossings	Number	0	0
Wetland crossings	Acres	0.0	0.0

Rockies Express' proposed route includes a deviation from the Platte Pipeline corridor in this location to avoid the existing Platte Pipeline Holdrege Station facility as well as the residence identified by this commentor. Rockies Express states that right-of-way agreements have been reached with the landowners along the proposed route in this area, and that no pipeline facilities or workspace would be located on the Barker tract. Although the route alternative would increase the distance of the Rockies Express pipeline from the Barker residence, it would transfer impacts to a new landowner currently unaffected by the proposal. Route alternatives are generally not adopted if they would merely transfer impacts from one property owner to another without conferring obvious environmental advantages.

We believe that natural gas pipelines do not pose a significant danger to the public if constructed and operated in accordance with DOT regulations (see section 4.12). Rockies Express' proposed pipeline would meet these safety standards. Based on our analysis of the routing in this area, we do not find a significant environmental advantage associated with the Barker Route Variation and therefore do not recommend that it be incorporated into the REX-West Project.

3.4.1.3 Woolsoncroft Route Variation (MPs 467.0 to 468.0)

A landowner (Janet Woolsoncroft) identified a route variation to avoid wetlands on her property in Nemaha County, Kansas, near about MP 467.4. The currently proposed route following the existing Platte pipeline would bisect an existing forested wetland complex on the property containing four swales and two associated ponds. Ms. Woolsoncroft asserts that the proposed route could affect the natural flow of water from at least two springs feeding into two ponds located downslope of the proposed right-of-way. The existing Platte pipeline was laid on the ground surface through the swale area, indicating minimal excavation and ground disturbance during installation. Present DOT regulations require that natural gas pipelines be buried. If the natural water flow were interrupted in this area, the hydrology of the wetlands and ponds could change, altering the habitat and natural wildlife community that are present. The wetland delineation conducted by Rockies Express notes standing water, springs, and wildlife in and around these wetlands. One of the wetlands is classified as a forested wetland. Ms. Woolsoncroft suggested an alternative route that would shift the pipeline 800 to 900 feet to the south from the proposed alignment to the upland habitat on the Woolsoncroft's southern property boundary. This route variation would remain on the Woolsoncroft property.

Rockies Express conducted a groundwater investigation on the Woolsoncroft Property on October 30, 2006, and documented the findings in its report *Groundwater Investigation of the Woolsoncroft Property, Nemaha, County Kansas* dated November 2006 and filed December 27, 2006. The investigation found dense clay layers from depths of 3.0 to 5.5 feet to unknown depths within the swales. More permeable clayey and silty soils were found to overlie the dense clay in the swales, and free water was found at depths of 26 to 30 inches. Standing water was observed in two ponds about 600 and 900 feet downstream of the proposed right-of-way. The conclusions and recommendations in the report

state that the upper clay layers in the drainages are more friable and provide greater permeability than the underlying stiff clays. It also states that it is possible that highly-localized sand lenses also have a role in supplying groundwater to the ponds, although only one boring found a very thin sand lense. The report also states that the near surface groundwater conditions would be restored through natural re-saturation of the materials in a matter of several weeks or months after construction. We believe that disruption of the surface flow for an extended period could have adverse effects on the wetlands and ponds downslope of construction. We believe that disturbance to the upper soil layers and any sand lenses has the chance to permanently disrupt the subsurface flow of water in the swales and wetlands.

In its comments on the draft EIS, Rockies Express provided an evaluation of a route variation on the Woolsoncroft property (figure 3.4-3). This variation would deviate from the proposed route at about MP 467.0 and turn southeast for 2,000 feet to the quarter section line, and then turn easterly, crossing the section road and entering the Woolsoncroft property. This route variation would continue in an easterly direction for an additional 1.1 miles where it would rejoin the proposed route at MP 468.4.

Table 3.4.1-3 provides a comparison of the significant environmental characteristics of the Woolsoncroft Route Variation and the corresponding segment of the proposed route. As shown, the Woolsoncroft Route Variation would be about 0.15 mile longer and affect about 2.47 more acres of land than the corresponding segment of the proposed route. However, this route variation would avoid affecting 1.13 acres of wetlands, including 0.23 acre of forested wetland, and the associated subsurface water flow and springs that provide water to these wetlands and ponds. The Woolsoncroft property is located within the Missouri Basin and is within an area having Wetland and Riparian Target Watersheds and a High Biological Priority in the Kansas Water Plan for the Missouri Basin Section (Kansas Water Office, 2003). One of the stated objectives of this plan is to enhance and restore priority wetlands and riparian areas. Also, the Kansas Department of Wildlife and Parks in its January 1, 2006, letter stated in its additional project recommendations to avoid impacts to existing wetlands. We agree that springs and wetlands of this type are generally rare in this area and therefore warrant additional protection. Because the landowner has requested this route variation on her property, and the variation would avoid impacts on these springs and forested wetlands, **we recommend that Rockies Express incorporate the Woolsoncroft Route Variation, as depicted in figure 3.4-3, into the final routing of the pipeline in this location.**

TABLE 3.4.1-3			
Woolsoncroft Route Variation Comparison			
Environmental Factor	Unit	Woolsoncroft Route Variation	Corresponding Segment of Proposed Route
Total length	Miles	1.51	1.36
Adjacent to existing pipeline right-of-way	Percent	74	100
Total land affected by construction	Acres	23.13	20.66
Stream crossings	Number	0	0
Wetland crossings	Acres	0.0	1.13
		(0.0 acres of forested)	(0.23 acre is classified as forested)

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Figure 3.4-3
Woolsoncroft Route Variation

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through the Public Reference Room, or by e-mail at
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3.4.1.4 Emmendorfer-Hall Route Variation (MPs 542 to 542.3)

In their comments on the draft EIS, landowners Emmendorfer and Hall identified concerns about the routing of the proposed pipeline across their property and its potential impact on future land uses. As currently proposed by Rockies Express, the pipeline route would follow the existing Platte Pipeline right-of-way that bisects the Emmendorfer-Hall property. The landowners are concerned that an additional permanent easement for the REX-West pipeline, in addition to the existing Platte Pipeline easement, would limit future uses of their property. They also identify the proposed Keystone Oil Pipeline project as an additional facility that could follow the proposed REX-West routing and further limit future use of the property.

Rockies Express provided an evaluation of a route variation on the Emmendorfer-Hall property in response to our data request. This route variation, shown on figure 3.4-4, would deviate from the proposed route at about MP 542 and travel southeast where it would turn to the east along the southern property boundary. The route variation would then turn to the northeast, continue along the property line, and rejoin the proposed route/Platte Pipeline corridor at about MP 542.3. Table 3.4.1-4 provides a comparison of the significant environmental characteristics of the Emmendorfer-Hall Route Variation and the corresponding segment of the proposed route. As shown, the Emmendorfer-Hall Route Variation would be 0.08 mile longer and would affect 1.2 more acres of land than the corresponding segment of the proposed route.

TABLE 3.4.1-4			
Emmendorfer-Hall Route Variation Comparison			
Environmental Factor	Unit	Emmendorfer-Hall Route Variation	Corresponding Segment of Proposed Route
Total length	Miles	0.39	0.31
Adjacent to existing pipeline right-of-way	Percent	20	100
Total land affected by construction	Acres	5.81	4.61
Stream crossings	Number	0	0
Wetland crossings	Acres	0.0	0.0

Our review indicates that while there is no significant environmental advantage to the Emmendorfer-Hall Route Variation when compared to the corresponding segment of the proposed route, landowners should be able to identify reasonable alternative routes within their own property boundaries to minimize impacts or to facilitate future land use planning on their properties, as long as there are no impacts on environmentally sensitive areas. Further, establishment of a new utility corridor on this property could provide an alternative corridor for the future Keystone Oil Pipeline that would be more acceptable to the landowner. Because the landowners have requested a minor field realignment on their property, and the Emmendorfer-Hall Route Variation would not result in additional impacts to environmentally sensitive areas or other landowners, **we recommend that Rockies Express incorporate the Emmendorfer-Hall Route Variation, as depicted in figure 3.4-4, into the final routing of the pipeline in this location.**

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Figure 3.4-4
Emmendorfer-Hall Variation

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3.4.1.5 Unternaehrer Route Variation (MPs 639.6 to 640.1)

We received comments from a landowner (Mr. Bob Unternaehrer) in Chariton County, Missouri regarding potential impacts on terrace farming structures and future land uses that could be affected by Rockies Express' proposed route across his property. Mr. Unternaehrer suggested a route alternative on his property that would avoid areas slated for future development and most existing terrace structures. In response to our data request regarding this issue, Rockies Express evaluated a route variation in this location in an attempt to address the landowner's concerns (figure 3.4-5). The Unternaehrer Route Variation would deviate from the proposed route at about MP 639.6 and trend slightly southeast for about 1,000 feet where it would turn to the east and follow on the north side of an existing field road. The variation would continue along the north side of the field road for approximately 1,500 feet where it would rejoin the proposed route at MP 640.1.

Table 3.4.1-5 provides a comparison of the significant environmental characteristics of the proposed route and the route variation in this location. As shown, the Unternaehrer Route Variation would be about 0.01 mile longer and affect about 0.4 acre more land than the corresponding segment of the proposed route.

Environmental Factor	Unit	Unternaehrer Route Variation	Corresponding Segment of Proposed Route
Total length	Miles	0.56	0.55
Adjacent to existing pipeline right-of-way	Percent	0	100
Total land affected by construction	Acres	9.00	8.60
Stream crossings	Number	0	0
Wetland crossings	Acres	0.0	0.0

Our review indicates that the Unternaehrer Route Variation would lessen impacts on an established terrace farm area. While construction through this type of agricultural system can be successfully accomplished through mitigative construction and restoration procedures (see section 4.8.1.2), we believe that landowners should be able to identify reasonable alternative routes within their own property boundaries to minimize impacts or to facilitate future land use planning on their properties, as long as there are no impacts on environmentally sensitive areas. In this case, the route variation would minimize impacts to existing terraces, including impacts on the area of concentrated water flow at the tile inlets, while preserving an area that the landowner has identified for future residential development. Because the landowner has requested a minor field realignment on his property, and the Unternaehrer Route Variation would not result in additional impacts on environmentally sensitive areas, **we recommend that Rockies Express incorporate the Unternaehrer Route Variation, as depicted in figure 3.4-5, into the final routing of the pipeline in this location.**

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Figure 3.4-5
Unternehmer Variation

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3.4.1.6 Crutchfield Route Variation (MPs 665.8 to 666.5)

We received a comment from a landowner in Randolph County, Missouri (Mr. Jerry Crutchfield) regarding potential impacts on his property at about MP 665.8. Mr. Crutchfield indicated that if the pipeline is installed on the proposed route, it would affect his residence and associated utilities, a recreational lake, and picnic area and shelter, and result in the clearing of a substantial number of large trees that border the lake. During a site visit to the property in December 2006, FERC staff confirmed the potential for the REX-West route to affect these resources and structures, and reviewed an alternative route proposed by Mr. Crutchfield that would avoid impacts on these resources. As a result of this review, we issued a data request on January 18, 2007, requesting that Rockies Express provide an environmental and engineering evaluation of a route variation in this location.

Our data request specifically asked Rockies Express to evaluate an alternate route that follows a cleared single-pole electric powerline right-of-way that serves three residences in the immediate area. Mr. Crutchfield said during the site visit that his preference was to have the pipeline aligned south of the powerline, which would still be on his property. However, in its response to our data request, Rockies Express evaluated a route variation *north* of the powerline, on an adjacent landowner’s property. This variation deviates from the proposed route/existing Platte Pipeline corridor at MP 665.8, heads northeast, and parallels the powerline corridor for about 0.5 mile where it then turns to the southeast and rejoins the proposed route at MP 666.5. Table 3.4.1-6 provides a comparison of environmental characteristics of the Crutchfield Route Variation (as submitted by Rockies Express) and the corresponding segment of the proposed route. As shown, the Crutchfield Route Variation would be about 0.14 mile longer and affect about 2.77 acres more land than the corresponding segment of the proposed route. However, a route variation would avoid affecting 0.78 acre of wetlands and surface water and would not affect the residence’s driveway or water lines and septic system, would avoid the removal of a shoreline picnic area and shelter, and avoid about 200 trees adjacent to the lake.

TABLE 3.4.1-6 Crutchfield Route Variation Comparison			
Environmental Factor	Unit	Crutchfield Variation	Corresponding Segment of Proposed Route
Total length	Miles	0.80	0.66
Adjacent to existing pipeline right-of-way	Percent	0	100
Total land affected by construction	Acres	12.38	9.65
Stream crossings	Number	0	0
Wetland crossings	Acres	0.0	0.78

Rockies Express’ response did not address why it evaluated this particular variation rather than the one identified by the landowner. In a follow-up call by FERC staff, Mr. Crutchfield confirmed that he was not asking for the route to be shifted to the north of his property, as shown on the map provided by Rockies Express. He also mentioned that the property lines on the map appeared to be incorrect, but that it was hard to tell because the map was not labeled.

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Figure 3.4-6
Crutchfield Variation

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As previously stated, we believe that landowners should be able to identify reasonable alternative routes to minimize impacts or to facilitate future land use planning, as long as they do not result in impacts on environmentally sensitive areas or shift impacts onto other properties. In this case, we believe Rockies Express can avoid impacts on an existing residence and an established recreational lake area by utilizing an existing utility corridor to the north of the proposed route. We find a significant environmental advantage associated with a variation on this property. Therefore, **we recommend that Rockies Express construct across the Crutchfield property along a route adjacent to and south of the existing single-pole electric powerline right-of-way.**

Mr. Crutchfield mentioned that the powerline is maintained by Howard Electric Co-op out of Fayette, Missouri. According to Mr. Crutchfield, Howard Electric Co-op is good to work with and is generally amenable to moving poles to accommodate farming practices or other land uses when brought up by landowners. Rockies Express may choose to contact Howard Electric Co-op in order to facilitate construction across this location.

3.4.2 TransColorado

The locations of TransColorado's pipeline facilities are constrained by the location of the existing TransColorado mainline and the requested tie-in to the Conoco Gas Plant. No route variations were considered for the location of these pipeline facilities.

3.4.3 Overthrust

Overthrust evaluated several minor route variations during the Pre-Filing Process and during the design development of the pipeline route (see section 1.3.3). Those providing environmental or constructability advantages were incorporated into Overthrust's filed proposed action. No additional route variations have been identified for the Wamsutter Expansion Project.

3.5 ABOVEGROUND FACILITY SITE ALTERNATIVES

3.5.1 Rockies Express

In general, while determining alternative locations for compressor stations, Rockies Express reviewed multiple sites near the hydraulically-optimal location for each compressor station site, using a set of 13 criteria to arrive at the preferred locations. These criteria were: proximity of public access; proximity of wetlands, streams, and ponds; proximity of dwellings and other structures; topography; the side of the existing right-of-way the site is on; proximity of public lands; distance from the milepost designated in the hydraulic study; average elevation of the site; environmental impediments; flood potential; proximity to high tension power lines; length of the proposed pipeline across the proposed compressor station property; and other land and right-of-way issues. Once the preferred location was determined, land availability and the willingness of landowners to sell a site were also considered.

The Meeker and Wamsutter Compressor Stations (MP^{EN} 0.0 and MP^{EN} 136, respectively) are existing station locations for which no alternative sites were analyzed.

The Echo Springs Compressor Station would be located at approximate MP^{EN} 148, which is about 11 miles east of the existing Wamsutter Compressor Station. Rockies Express considered several alternate sites for this compressor station. However, due to hydraulic requirements associated with the nearby Wamsutter Compressor Station, the proposed site was selected.

The Cheyenne Compressor Station site is located at the origin of the REX-West Pipeline (MP 0.0) on the south side of the group of existing natural gas-related facilities known as the Cheyenne Hub. Natural gas would be delivered to the Cheyenne Compressor Station via the Rockies Express/Entrega pipeline, and then into the REX-West pipeline. The proposed location of this compressor station was chosen due to the geometry of the existing pipelines at the Cheyenne Hub and the location of the Rockies Express/Entrega terminal facilities. No alternative sites were identified for this station.

Numerous potential sites were pre-selected and reviewed by Rockies Express for the each of the three remaining compressor station sites (Julesburg [20 locations on the north and south sides of the Trailblazer pipeline right-of-way], Steele City [11 locations on the north and south sides of the Platte pipeline right-of-way], and Turney [14 locations on the north and south sides of the Platte pipeline right-of-way]). Rockies Express then used the aforementioned criteria to narrow the evaluation down to four potential sites for each compressor station. For the Julesburg Compressor Station, Rockies Express evaluated sites at approximate MPs 143.0, 143.8, 144.0, and 145.0. The site at MP 143.8 was selected by Rockies Express as the preferred compressor station site since the terrain is flat, planted with crops, contains no structures, and is easily accessible from County Road 55. For the Steele City Compressor Station, Rockies Express evaluated sites at approximate MPs 431.0, 431.5, 432.0, and 433.0. Rockies Express selected the site at MP 431.5 for the same general reasons (topography, land use, and access) as the Julesburg site. Rockies Express noted that a barn is present next to the north edge of the site, but it is apparently abandoned. For the Turney Compressor Station, Rockies Express initially evaluated sites at MPs 570.0, 571.0, 571.2, and 572.0. Based upon engineering hydraulics and location, Rockies Express selected a site at MP 571.2 as its preferred site; however, the landowner was not amenable to this use of the land. As a result, Rockies Express evaluated sites under different land ownership near MPs 572.5 and 572.7. The site at MP 572.7 was eliminated due to potential wetland impacts. The site at MP 572.5 was selected as the preferred compressor station site. Rockies Express reports that the landowner is not opposed to the proposed siting.

We did not receive any comments suggesting other, more favorable sites for the Julesburg, Steele City, and Turney Compressor Stations. Based on our evaluation (including site visits) of the proposed aboveground facility sites and several of the sites originally considered, we conclude that the proposed locations are environmentally acceptable.

Proposed meter station locations reflect customer and system requirements. Pigging facilities would be located for efficient testing and cleaning of the pipeline. Additionally, these facilities would be collocated with other aboveground facilities to the maximum extent practicable.

Proposed MLV locations have been spaced along the pipeline at the locations described in section 4.12.1. Valve spacing would be in accordance with the spacing requirements of 49 CFR Part 192, Transportation of Natural or Other Gas by Pipeline: Minimum Federal Safety Standards. The locations have been selected with consideration given to their proximity to existing all-weather roads, which would be utilized for maintenance access. Thus, locations along and within the proposed route are defined by regulation and existing roads. No alternative sites have been identified for MLV locations.

3.5.2 TransColorado

The nature of TransColorado's Blanco to Meeker Expansion Project is reversing the current directional flow of natural gas and adding compression to an existing pipeline. Thus, there are significant limitations on identifying alternatives to the proposed action, including potential alternate aboveground facility sites. Operational considerations as well as environmental and landowner concerns were factored into the siting of the proposed two new compressor stations and the proposed modification to an existing station.

Alternate locations for the additional compression at the Greasewood Compressor Station were considered by TransColorado but rejected based on the desire to minimize overall disturbance. The proposed location allows for a smaller area of disturbance by using portions of the existing facility. We note that additional land area outside of the existing facility was previously disturbed for use as extra workspace in the construction of the existing facility. We agree that it is usually environmentally preferable to expand existing facilities rather than constructing new compressor station sites.

Alternatives for siting the proposed Conn Creek Compressor Station are limited by the engineering requirement for the facility to be within 1 mile of the existing interconnect at the Oxy Meter Station. The topography of the area provides few options for siting a new compressor station due to the extensive ridge and valley formations typical of the Colorado Plateau. The final consideration in TransColorado's choice of the proposed location was a result of the landowner's request to place the facility as close as possible to other existing facilities.

The proposed locations of the Blanco Compressor Station and Blanco Hub Meter Station are the result of the requirement to place the compressor station sufficiently close to existing gas facilities to minimize the length of the receipt pipeline. The proposed location provides access while minimizing additional disturbance related to the receipt pipeline.

Because we did not receive comments regarding TransColorado's proposed compressor station locations, and we did not identify any significant environmental issues with TransColorado's proposed sites, we did not conduct any further analysis for alternate aboveground facility sites.

3.5.3 Overthrust

In siting the proposed Rock Springs and Roberson Compressor Stations, Overthrust considered landownership, constructability, surrounding land use, and access. When these parameters were evaluated, Overthrust identified the proposed locations as the most practicable sites. The location of the Wamsutter Delivery Point was dictated by tie-in facilities. Overthrust's aboveground facilities would be adjacent to existing natural gas facilities and potential alternative tie-in locations do not exist within the vicinity of the project. In addition, we did not receive comments regarding Overthrust's proposed compressor station locations, and we did not identify any significant environmental issues with the proposed sites. Thus, we did not conduct any further analysis for alternate aboveground facility sites.