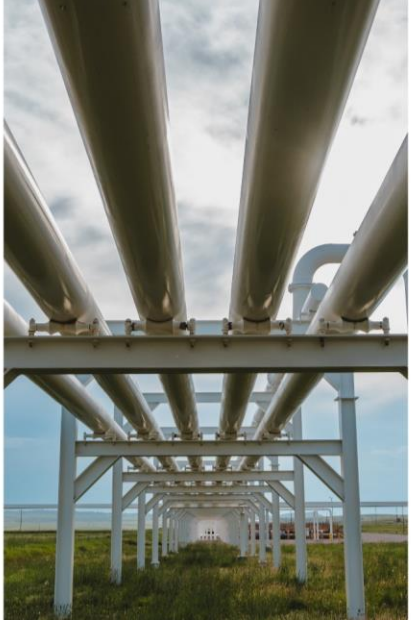
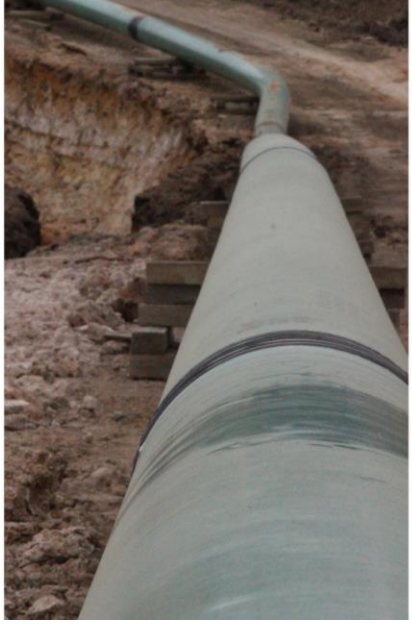





Bridger Pipeline Expansion

Plan of Development

Prepared for:

Bridger Pipeline Expansion, LLC
455 North Poplar Street
Casper, WY 82601

March 24, 2026

Prepared by:

Ulteig Operations
419 Riverwood Dr, Suite 201
Bismarck, ND 58504

REVISION HISTORY

Revision	Date	Description
Version 1	11/6/2025	Preliminary application submittal to BLM
Version 2	1/30/2026	Revised application submittal to BLM
Version 3	3/9/2026	Revised application submittal to BLM
Version 4	3/24/2026	Revised application submittal to BLM

TABLE OF CONTENTS

List of Tables

List of Figures

Acronyms & Abbreviations

ACECs	Areas of Critical Environmental Concern
AMSL	Above Mean Sea Level
AOCs	abnormal operating conditions
API	American Petroleum Institute
ARMP	Approved Resource Management Plan
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Additional Temporary Workspaces
BPD	Barrels Per Day
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMPs	best management practices
BOR	Bureau of Reclamation
CFR	Code of Federal Regulations
CMRP	Construction, Mitigation, and Reclamation Plan
CSU	Controlled Surface Use
CWA	Clean Water Act
EA	Environmental Assessment
ECOS	Environmental Conservation Online System
EIS	Environmental Impact Statement
ESA	Endangered Species Act
ERMA	Extensive Recreation Management Area
FEMA	Federal Emergency Management Agency
FLPMA	Federal Land Policy and Management Act
FRP	Facility Response Plan

HAPs	Hazardous Air Pollutants
HDD	Horizontal Directional Drill
IARC	International Agency for Research on Cancer
ICS	Incident Command System
INGAA	Interstate Natural Gas Association of America
IPaC	Information for Planning and Consultation
IPM	Integrated Pest Management
LRMP	Land and Resource Management Plan
MEPA	Montana Environmental Policy Act
MFSA	Montana Major Facility Siting Act
MLRA	Major Land Resource Areas
MLV	Mainline Valves
MPDES	Montana Pollutant Discharge Elimination System
MTDEQ	Montana Department of Environmental Quality
MTNHP	Montana's Natural Heritage Program
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NFS	National Forest System
NHD	National Hydrography Dataset
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NSO	No Surface Occupancy
NWI	National Wetland Inventory
NWMP	Noxious Weed Management Plan
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PHMSA	Pipeline and Hazardous Materials Safety Administration
POD	Plan of Development
PPE	personal protective equipment
PRPA	Paleontological Resources Preservation Act
QI	Qualified Individual
RDF	Required Design Features
ROD	Record of Decision
RMP	Resource Management Plan
RNA	Research Natural Area
ROW	Right-of-Way
SCADA	Supervisory control and data acquisition
SFHA	Special Flood Hazard Areas
SGCN	Species of Greatest Conservation Need
SGCP	Sage Grouse Conservation Plan
SHPO	State Historic Preservation Office
SIOs	Scenic Integrity Objectives
SMS	Scenery Management System
SOC	Species of Concern
SPCC	Spill Prevention, Control, and Countermeasure
SRMAs	Special Recreation Management Areas
SSURGO	Soil Survey Geographic Database
SWPA	Source Water Protection Areas
SWPPP	Stormwater Pollution Prevention Plan
TBNG	Thunder Basin National Grassland
TCP	Traditional cultural properties
THPO	Tribal Historic Preservation Office
TMDL	Total Maximum Daily Load
TUP	Temporary Use Permit
ULSD	Ultra-low Sulfur Diesel
ULT	Ute ladies'-tresses
USACE	U.S. Army Corps of Engineers
USDOT	U.S. Department of Transportation
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VRM	Visual Resource Management
WYNDD	Wyoming's Natural Diversity Database

1 INTRODUCTION

Bridger Pipeline Expansion, LLC, a wholly owned subsidiary of Bridger Pipeline, LLC (collectively, "Bridger") is planning the development and operation of the "*Bridger Pipeline Expansion*" project, a 36-inch crude oil transmission pipeline, hereafter referred to as "the Project". The Project will extend from the United States (U.S.)/Canada border in Phillips County, Montana, to an existing crude oil terminal facility near Guernsey in Platte County, Wyoming. Refer to ***Figure 1: Project Overview, Figure 2: Montana Project Overview,*** and ***Figure 3: Wyoming Project Overview***. The Project will traverse portions of federal lands administered by the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), and will include associated infrastructure such as access roads, pump stations, valve sets and pipeline markers. The Project is designed to enhance national energy infrastructure, supporting safe and efficient transportation of crude oil to meet growing market demands in the US. Bridger is not receiving federal payments or financial incentives for development, construction, or operation of the Project.

The Project will seek a Presidential Permit to authorize construction and operation of facilities crossing the U.S./Canada border in Phillips County, Montana.

This Plan of Development (POD) outlines the practices Bridger and its contractors will follow throughout the construction, operation, and maintenance phases of the Project on lands administered by BLM and USFS. The POD provides a summary of planned Project activities and describes the best management practices (BMPs) and mitigation measures that will be implemented to minimize environmental impacts. As the Project progresses, the POD may be updated to reflect changes in design, site conditions, or new information.

Reclamation measures, monitoring activities, and surface restoration standards described in this POD are intended to satisfy applicable federal land management agency requirements, including those of the BLM and USFS, for activities occurring on federal lands. Reclamation activities on non-federal lands will be implemented in accordance with applicable permits, the Project's Stormwater Pollution Prevention Plan (SWPPP), and landowner-specific agreements and preferences. Reclamation commitments described herein are not intended to establish uniform requirements across all land ownership types or to obligate the Project to federal reclamation standards on non-federal lands.

1.1 Project Summary

The Project involves the construction and operation of a 36-inch diameter steel crude oil transmission pipeline. On federal lands, construction would occur within a corridor of up to 150 feet in width. On USFS–managed lands, the Project would utilize a 100-foot-wide permanent right-of-way (ROW) and a 50-foot-wide Temporary Use Permit (TUP) construction corridor. Conversely, on BLM–managed lands, the Project would utilize a 50-foot-wide permanent ROW and a 100-foot-wide TUP construction corridor. Final permanent ROW and TUP construction corridor widths on BLM and USFS lands would be determined in coordination with, and subject to approval by, the respective land-managing agencies.

On both USFS- and BLM-managed lands, the permanent ROW would generally be centered within the construction corridor. However, terrain constraints, resource avoidance measures, or other site-specific considerations may require the TUP corridor to be shifted partially or entirely to one side of the permanent ROW.

The TUP construction corridor and ROW will be used for equipment staging, material storage, and workspace for crews, providing adequate space for safe and efficient installation and maintenance of the pipeline and related facilities.

Contract negotiations are ongoing to finalize pipe mill selection, with 2–3 mills anticipated. Pipe will be transported via rail and truck to the staging areas and ROW.

In locations where sensitive environmental or cultural resources, or Tribally identified resources, significant topographical features, or regulatory constraints are present—such as near rivers, wetlands, protected habitats, or cultural sites—the configuration and/or width of the TUP construction corridor may be modified or reduced to minimize disturbance and comply with agency and Tribal requirements. Where feasible, and safe, temporary narrowing of the construction corridor to a minimum width of approximately 75 feet may be implemented for short segments of up to 500 feet, with such narrowing repeated as needed, provided it can be performed safely and in coordination with the applicable land-managing agency.

Bridger will require both temporary and permanent access roads on federal lands to support construction, operation, and maintenance of the Project. Temporary access roads would be used during construction for equipment and material access and would be reclaimed following completion. Permanent access roads would provide ongoing access to the pipeline and associated facilities, where long-term access is necessary. Access road locations and configurations would be coordinated with the BLM and USFS to use existing routes where feasible, minimize disturbance, and comply with applicable right-of-way authorization requirements.

Environmental resources potentially affected by the Project include landforms, surface water and groundwater resources, air quality, native vegetation, wildlife and associated habitats, and paleontological, cultural, and historical resources. This adaptive approach allows the Project to balance construction efficiency with environmental stewardship and regulatory compliance.

Bridger plans to install eight pump stations along the pipeline route between the U.S./Canada border in Phillips County, Montana, and the existing terminal facility near Guernsey, Wyoming. One pump station (Station No. 1) will be located on federal lands near the U.S./Canada border. In addition, the Project will include 72 mainline valve sets (MLVs), all of which will be situated within the permanent ROW. Six MLVs are proposed on federal lands (five in Montana and one in Wyoming), and 66 MLVs are proposed on non-federal lands.

Mainline valves will be spaced at a maximum interval of approximately 15 miles and positioned on both sides of major water crossings to ensure operational safety and environmental protection. Pump stations and valve sets are essential for maintaining optimal pressure and flow rates throughout the transmission system—ensuring the safe and efficient movement of crude oil over long distances. The precise locations of these facilities will be determined based on hydraulic modeling, operational and regulatory requirements, and environmental considerations, with final siting subject to regulatory review and landowner coordination.

The Project will also require temporary staging areas and material storage sites during construction. The locations and layouts of these facilities will be refined as project planning advances and will consider proximity to construction spreads, access to existing infrastructure, minimization of environmental and cultural impacts, and compliance with local, state, federal, and Tribal regulations. Pump stations, staging areas, access roads and ancillary facilities will be sited and designed to avoid or minimize impacts to environmental, cultural, and Tribally identified resources and may be subject to redesign, relocation, or additional mitigation measures as necessary.

In addition to the BLM approval, the Project will require several other federal permits and approvals to ensure compliance with applicable laws and regulations. These include, but are not limited to, the Presidential Permit, permits from the U.S. Army Corps of Engineers (USACE) for activities affecting wetlands and waterways under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act, and coordination with the U.S. Fish and Wildlife Service (USFWS) to comply with the Endangered Species Act (ESA). Additional state, local, and Tribal permits or approvals may also be required and will be obtained as applicable. Please refer to ***Appendix G*** for a full list of permitting requirements and possibilities.

Figure 1: Project Overview

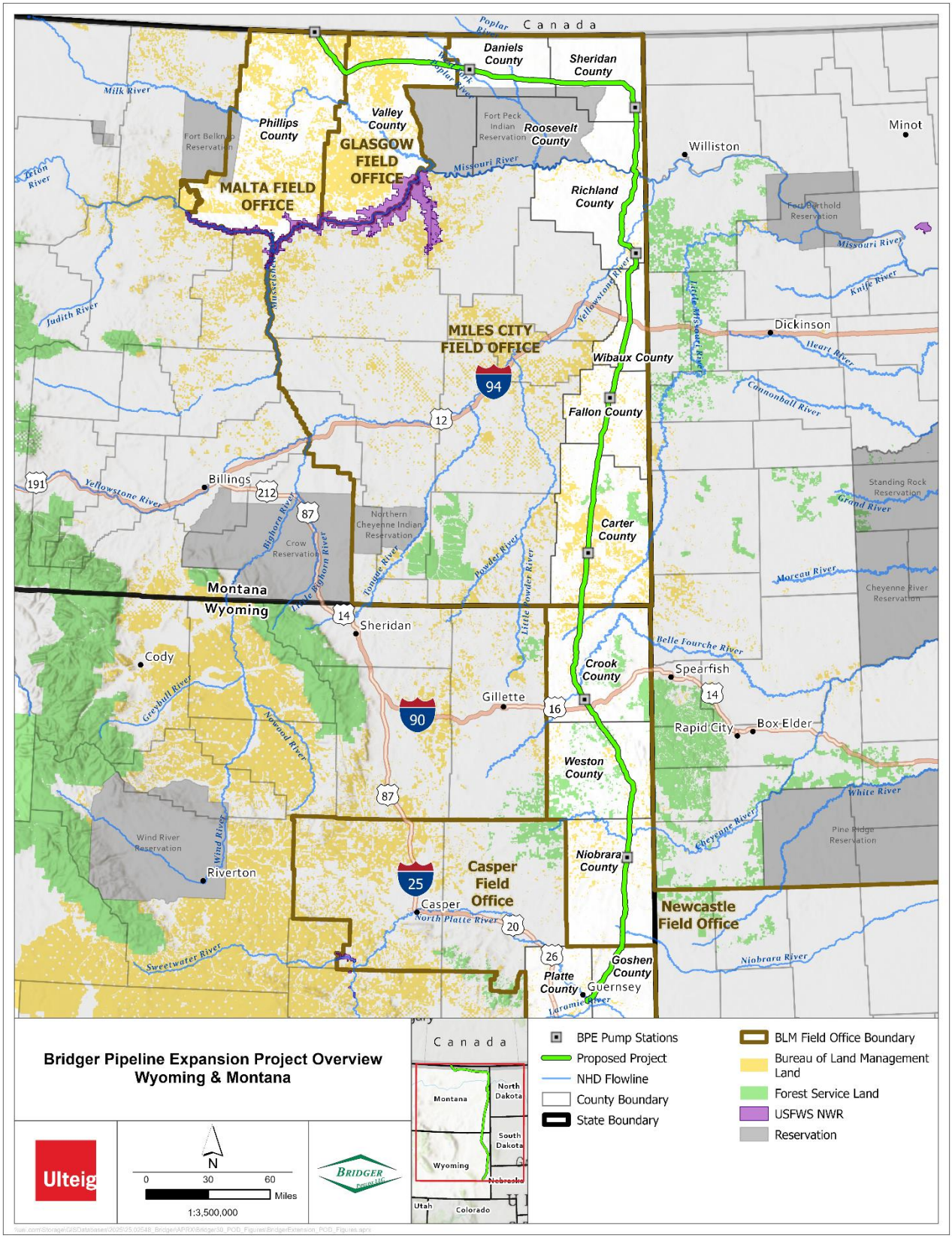


Figure 2: Montana Project Overview

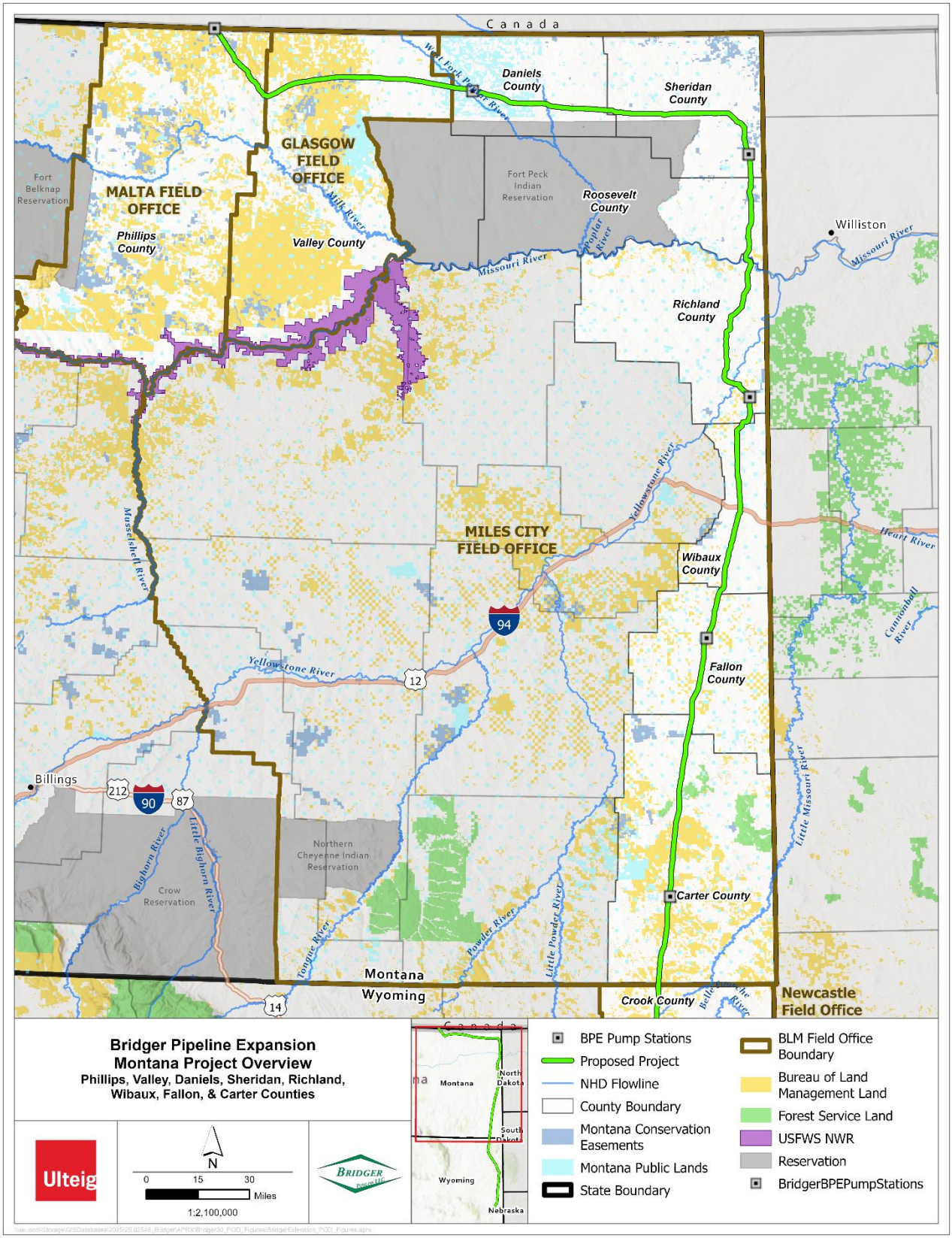
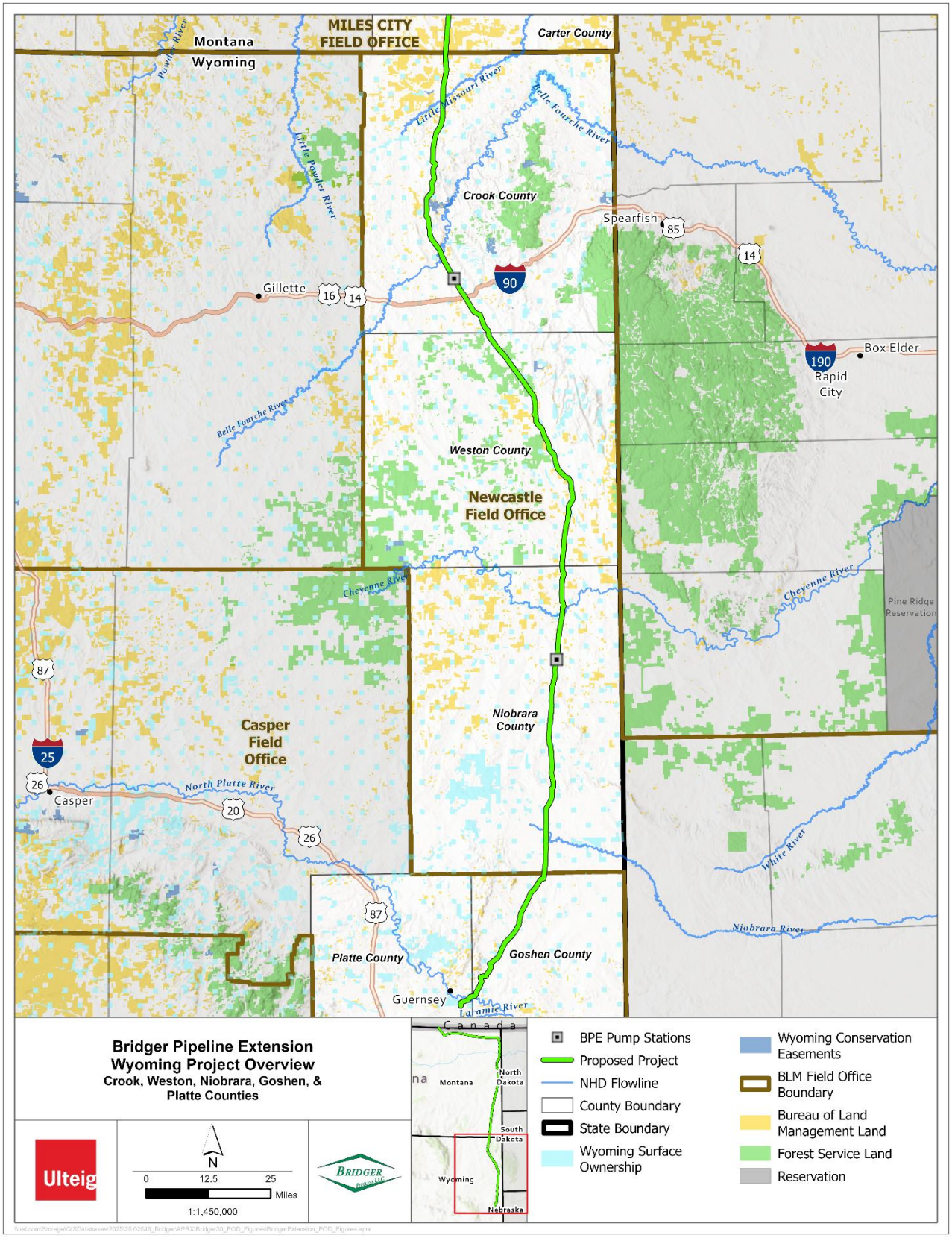


Figure 3: Wyoming Project Overview



1.2 Affected Federal Lands

The Project has been sited predominantly on private lands; however, parcels of both BLM and USFS lands would be crossed. The Project would include construction, installation, and operation of approximately 52.5 miles of underground pipeline on BLM-administered lands in Montana and approximately 6.2 miles of underground pipeline on BLM-administered lands in Wyoming, for a total of approximately 58.7 miles of pipeline across. Beyond BLM-administered lands, the Project would cross approximately 5.2 miles of USFS-administered lands within the Thunder Basin National Grasslands (TBNG) in Wyoming. Legal land descriptions for federal land segments requiring ROWs and TUPs are provided in ***Appendix A***.

BLM lands crossed by the Project are located within the Malta, Glasgow, and Miles City Field Offices in Montana, and the Newcastle Field Office in Wyoming. While the Project is also located within the BLM Casper Field Office administrative boundary in Wyoming, no federal lands are crossed within that boundary. Refer to ***Figure 4: Resource Management Plan Areas.***

BLM lands crossed by the Project are currently managed under applicable RMPs, including the 2015 Record of Decision (ROD) and Resource Management Plan (RMP) Amendments for the Rocky Mountain Region, which apply to the HiLine, Miles City, and portions of Wyoming planning areas. These plans include management direction related to greater sage-grouse conservation and other resource values. The Project will also consider applicable subsequent plan amendments and RODs, including the 2025 greater sage-grouse-related land use plan decisions, as applicable at the time of NEPA review and authorization.

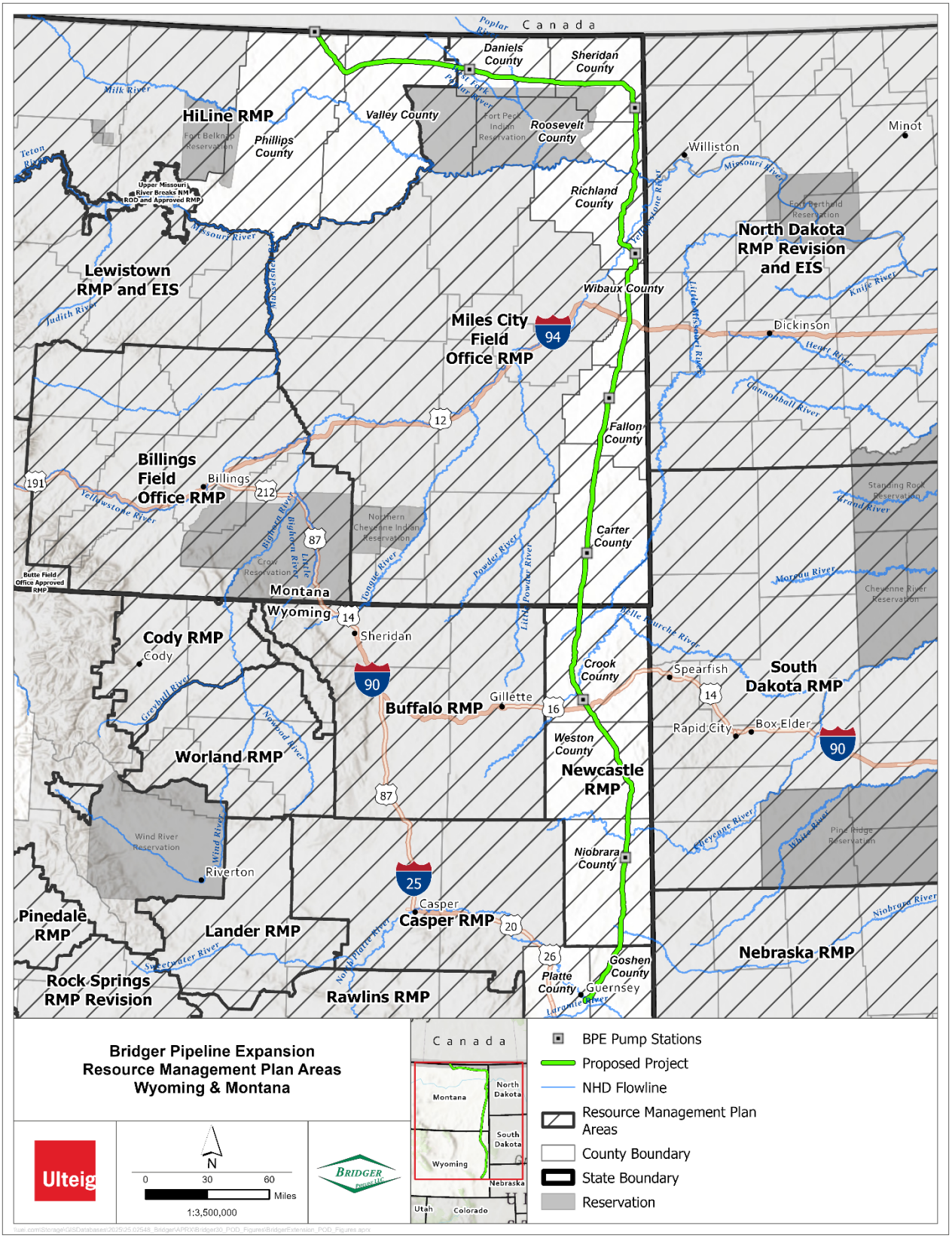
ROW authorization across BLM and USFS lands requires conformance with applicable land use plans. The Project has been sited to align with management direction in current BLM RMPs and USFS Land and Resource Management Plans (LRMPs). Bridger will demonstrate land use plan conformance during the NEPA process and will incorporate any amendments or decisions in effect at the time of review.

The Project would also cross irrigation canals managed by the Bureau of Reclamation (BOR). Canal crossings under the jurisdiction of the BOR in Montana typically span approximately 50 feet in width. These crossings are not included in the Project's mileage or acreage calculations. The BOR generally holds easements for the canal facilities rather than owning the underlying land. Coordination with BOR is planned as part of the NEPA process to identify applicable permitting requirements and construction stipulations associated with these crossings.

1.3 Summary of Changes

- **Version 1**: November 6, 2025 - Initial submitted POD. Preliminary application submittal to BLM.
- **Version 2**: January 30, 2026 - Revisions clarify ROW and construction corridor widths, address coordination with land agencies, and add details regarding sensitive environments. Multiple revisions were made to address BLM comments on the original version.
- **Version 3**: March 9, 2026 – Revisions clarified ROW and construction corridor widths; refined construction, reclamation, and monitoring measures; and expanded resource-specific descriptions and commitments. Updates were made to directly address BLM comments provided from Version 2.
- **Version 4**: March 24, 2026 - Revisions clarified access needs and ROW/TUP assumptions; corrected and aligned tables/figures; and expanded/updated resource-specific discussions and commitments.

Figure 4: Resource Management Plan Areas



2 Purpose and Need

The purpose of the Project is to transport crude oil from production areas in Canada to existing infrastructure and downstream markets in the United States. The Project responds to the national energy emergency declared by President Trump in Executive Order 14156 ("Declaring a National Energy Emergency," January 20, 2025) which identifies the expansion of energy infrastructure as "an immediate and pressing priority for the protection of the United States' national and economic security." Consistent with this directive, the Project is intended to facilitate the timely construction and operation of energy transportation infrastructure needed to support reliable crude oil supply to U.S. markets.

The proposed project facilitates fulfillment of the significant and growing demand for the safe, efficient, and reliable transportation of crude oil resources from production areas in Canada to existing infrastructure in Guernsey, Wyoming and other downstream markets. The Project is needed to address critical energy supply challenges facing the United States, increase oil supply into the U.S. for growing refinery production and to lower prices at the pump. The Project reflects a significant and meaningful investment in the U.S. energy economy. Executive Order 14156 ("Declaring a National Energy Emergency," January 20, 2025, directs federal agencies to expedite the identification, siting, production, transportation, and generation of domestic energy resources, including crude oil, on federal lands and elsewhere, to ensure national energy security and economic stability, specifically Sec. 3, Expediting the Delivery of Energy Infrastructure.

3 Project Description

The Project will transport crude oil from production areas in Canada to an existing terminal facility near Guernsey, Wyoming. From the Canada-U.S. border in Phillips County, Montana, the pipeline will span approximately 646.9 miles, traversing federal, state, and private lands as it makes its way south. Refer to ***Table 1: Land Ownership.***

Bridger requires several key facilities along the route. These key facilities include MLVs, pump stations, temporary pipe yards, and access roads. MLVs and pump stations would be situated atop gravel pads and secured by a perimeter fence. These components are essential for controlling flow, maintaining system pressure, isolating segments of the pipe in the event of a leak, storing materials, and ensuring reliable access for construction and ongoing operations.

The Project will utilize a combined construction corridor of up to 150 feet in width on federal lands. On BLM-managed lands, the Project will utilize a 50-foot-wide permanent ROW and a 100-foot-wide TUP construction corridor. On USFS-managed lands, the Project will utilize a 100-foot-wide permanent ROW and a 50-foot-wide TUP construction corridor. The permanent ROW is requested for a 30-year term with the option for renewal. Refer to ***Table 2: Summary of Disturbance on Federal Lands***, ***Figure 5: Typical ROW on BLM Lands,*** and ***Figure 6: Typical ROW on USFS Lands.*** Additional detail on the length and acreage of disturbance associated with the proposed pipeline, summarized by county, is provided in ***Appendix B***.

Placement of the pipeline within the permanent ROW and the configuration of the TUP construction corridor may be adjusted based on site-specific conditions such as terrain, existing infrastructure, landowner preferences, and the presence of environmentally sensitive areas. Where practicable, the Project will align with existing pipeline ROWs or easements to minimize new disturbance. For construction staging at road or water crossings, or in areas requiring additional workspace, ATWS will be obtained as needed and restored following construction in accordance with applicable permit conditions.

Bridger anticipates that certain utility line work will be required for the Project. Bridger would not be responsible for permitting or constructing power lines required for the project; such responsibilities would fall to the appropriate utility providers. Utility providers would pursue any needed state or federal approvals. The likelihood of these facilities being sited on federal lands and/or scope of work required for the utility companies to connect with these facilities is to be determined.

In addition to BLM approvals, the Project will require a Presidential Permit for the crossing of the U.S./Canada border and a certificate from the Montana Department of Environmental Quality (MTDEQ) to comply with the Montana Major Facility Siting Act (MFSA). The MFSA requires environmental review in accordance with the Montana Environmental Policy Act (MEPA). The applications for the Presidential Permit and the MTDEQ MFSA certificate will be developed in parallel with other relevant federal and state permitting processes.

Table 1: Land Ownership

Ownership Type	Miles Crossed	Acres within 150 Foot Corridor	Percent of Total Length
		Montana	
Federal	52.50	954.72	12.1
State	56.07	1,020.29	12.9
Private	326.64	5,936.80	75.0
Montana Subtotal	**435.20**	**7,911.811**	**100**
		Wyoming	
Federal	11.34	206.25	5.3
State	22.85	414.97	10.8
Private	177.47	2,693.37	83.9
Wyoming Subtotal	**211.66**	**3,314.58**	**100**
		Overall Project	
Federal	**63.83**	**1,160.96**	**9.9**
State	**78.92**	**1,435.26**	**12.2**
Private	**504.11**	**8,630.17**	**77.9**
Project Total	**646.86**	**11,226.39**	**100**

*The lengths provided indicate the pipeline length. Access roads are excluded.

Figure 5: Typical ROW on BLM Lands

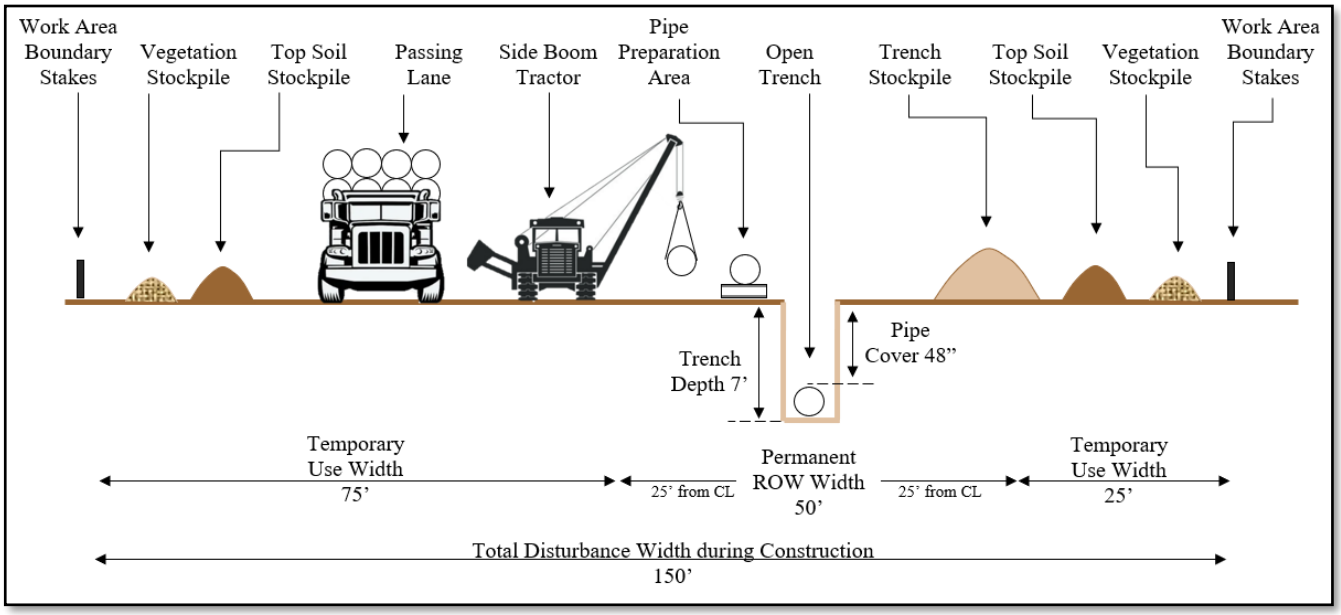
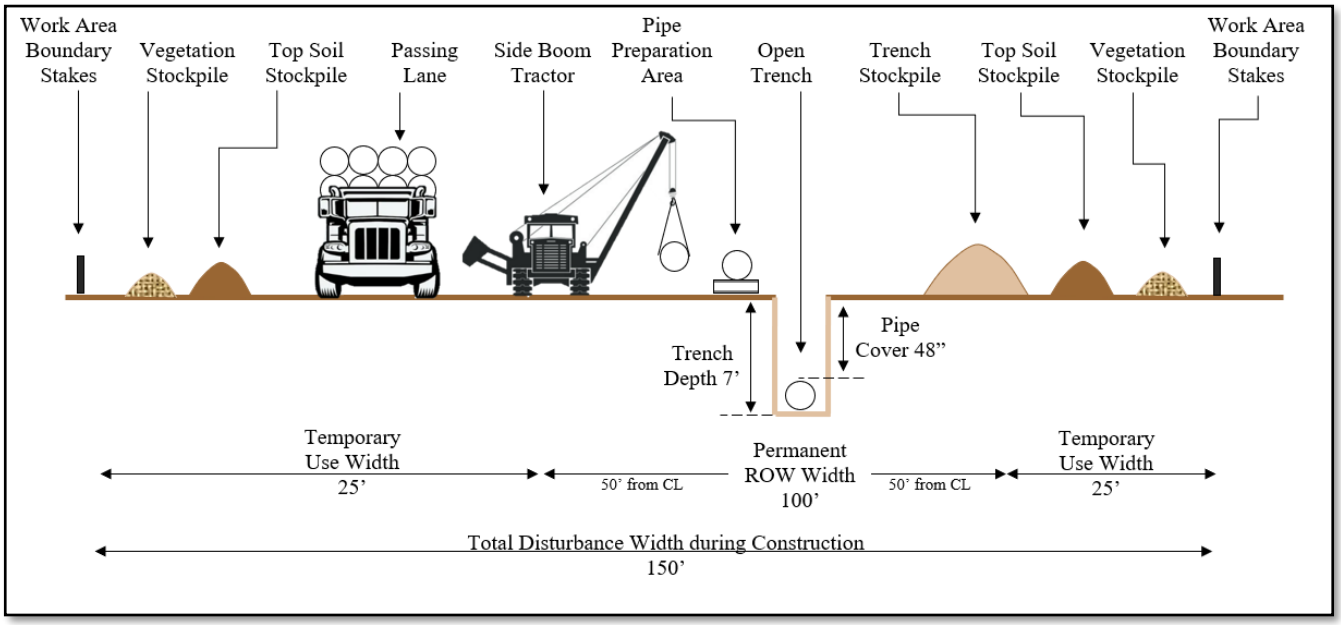


Table 2: Summary of Disturbance on Federal Lands

Location	Ownership	Pipeline ROW		Pump Station ROW	Permanent Access Roads		Temporary Access Roads	
		Miles	Acres	Acres	Miles	Acres	Miles	Acres
Permanent Right-of-Way								
Glasgow FO	BLM	17.48	105.88	0	0	0		
Malta FO	BLM	3.98	23.37	11.24	0.81	6.02		
Miles City FO	BLM	31.06	188.37	0	0	0		
Newcastle FO	BLM	11.65	101.93	0	0	0		
	BLM Total	64.17	419.55	11.24	0.81	6.02		
Thunder Basin NG	USFS	5.16	62.54	0	0	0		
Permanent Federal ROW Total		**69.33**	**482.09**	**11.24**	**0.81**	**6.02**		
Temporary Use Permit								
Glasgow FO	BLM	17.48	211.03	0			8.84	65.35
Malta FO	BLM	3.98	46.78	3.28			4.83	35.85
Miles City FO	BLM	31.06	379.69	0			50.45	370.80
Newcastle FO	BLM	11.65	110.14	0			22.38	166.40
	BLM Total	64.17	747.6	3.28			86.50	638.40
Thunder Basin NG	USFS	5.16	31.4	0			7.97	58.22
Temporary Use Permit Total		**69.33**	**779.0**	**3.28**			**94.47**	**696.62**

Figure 6: Typical ROW on USFS Lands



3.1 Connection to an Existing Right-of-Way

The Project was developed to both co-locate with and parallel existing linear infrastructure corridors where practicable—including existing pipeline systems—to minimize land area occupied by pipeline facilities and consolidate new construction within areas already influenced by prior development. For purposes of this discussion, the terms parallel and co-location describe the spatial relationship of the proposed pipeline alignment to nearby infrastructure and do not imply use of previously disturbed ground.

Parallel refers to routing the pipeline corridor within 1,000 feet of existing infrastructure without occupying the same ROW. This approach provides operational efficiencies by allowing multiple lines to be monitored together over the life of the pipeline, including through aerial patrols, valve inspections, and general maintenance. The distance between the proposed route and existing infrastructure varies by location and is influenced by engineering requirements, property boundaries, safety needs, and the need to avoid sensitive environmental, cultural, or Tribally identified resources. While some areas of previously undisturbed land may remain between the Project and existing infrastructure, the Project is not creating a new utility corridor; rather, it is located within a landscape already shaped by existing development. As a result, certain resources in these areas may have already been affected by adjacent infrastructure.

In Montana, approximately 214 miles of the proposed route run parallel to existing pipeline infrastructure, and in Wyoming, about 121 miles follow existing pipeline corridors. Of this total, the Project would parallel Bridger-owned infrastructure for roughly 138 miles in Montana and 100 miles in Wyoming. Altogether, the Project parallels existing pipeline corridors for approximately 335 miles, representing about 52 percent of the entire route.

Across federal lands, the Project parallels existing pipeline infrastructure for about 38 miles on BLM-administered lands, accounting for roughly 63 percent of the route located on BLM lands. No portions of the route parallel existing pipelines on USFS-administered lands.

Co-location refers to placement of the proposed pipeline within or directly abutting an existing pipeline ROW. For this Project, any pipeline located within 150 feet of the proposed centerline is considered co-located; this threshold does not include access roads, transmission lines, or other infrastructure. Refer to ***Figure 7: Co-located ROW on BLM Lands*** and ***Figure 8: Co-located ROW on USFS lands.***

Figure 7: Co-located ROW on BLM Lands

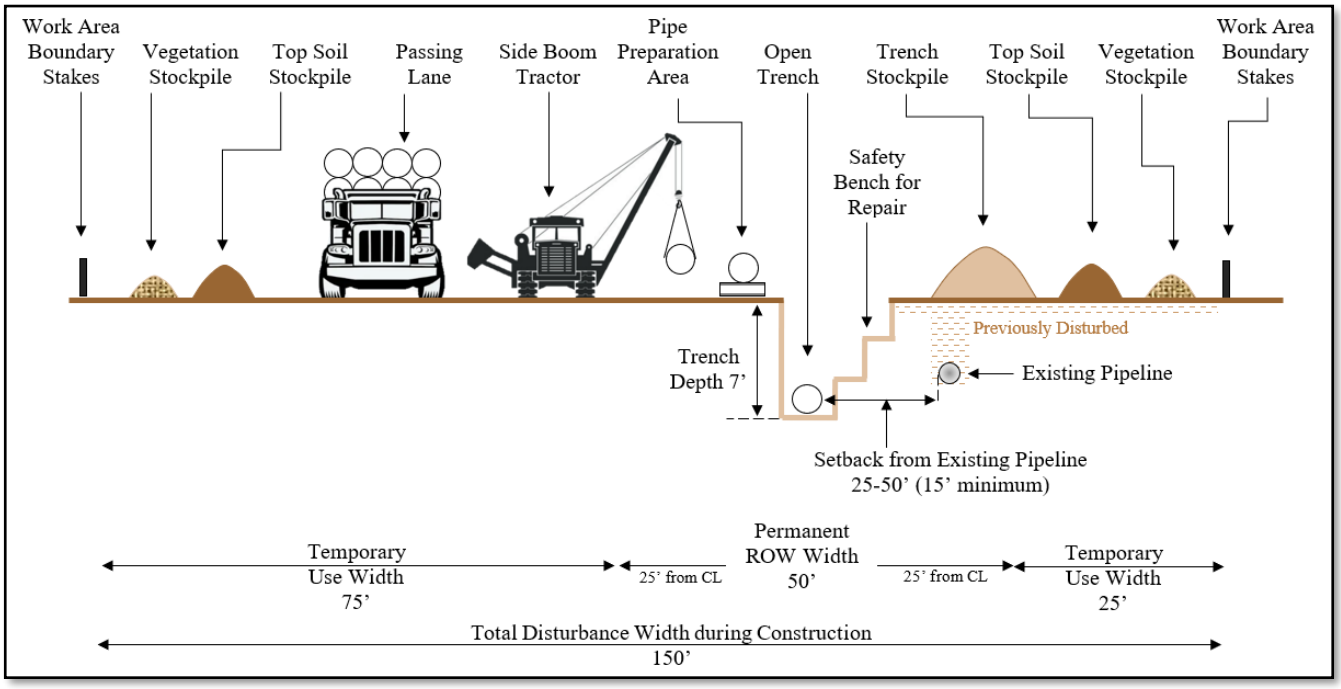
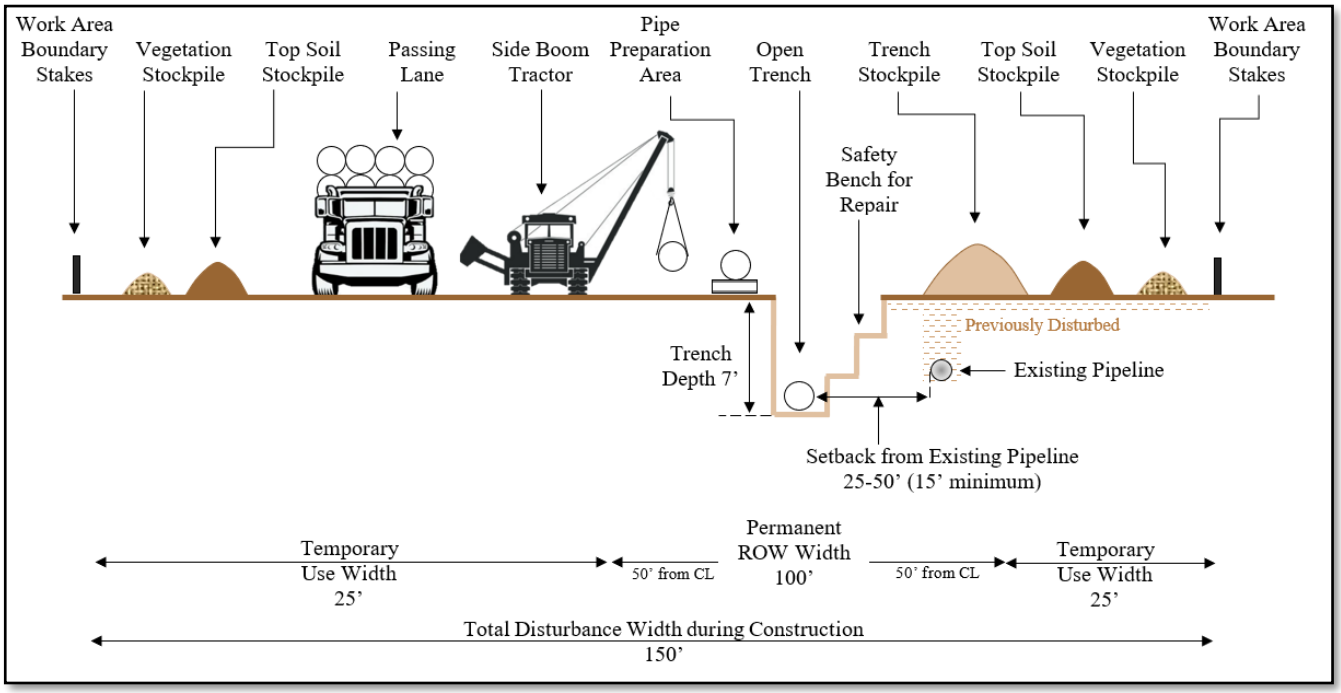


Figure 8: Co-located ROW on USFS lands



In Montana, approximately 84 miles of the proposed route are co-located with existing pipeline infrastructure, and in Wyoming approximately 45 miles are co-located with existing pipeline infrastructure. Within these co-located segments, the Project would follow corridors adjacent to Bridger-owned infrastructure for roughly 43 miles in Montana and 35 miles in Wyoming. In total, the Project co-locates with existing pipeline corridors for approximately 129 miles, representing about 20 percent of the overall route.

Across federal lands, the Project co-locates with existing pipeline infrastructure for approximately 6 miles on BLM-administered lands. The Project does not co-locate with existing infrastructure on USFS-administered lands.

In several areas, the proposed alignment deviates from existing pipeline centerlines due to land ownership boundaries, environmental or cultural resource avoidance, engineering constraints, safety considerations, or regulatory requirements. Consequently, certain segments may traverse previously undisturbed areas even where the route generally parallels existing infrastructure.

3.2 Additional Components of the ROW

The Project will require a permanent ROW and a TUP construction corridor on federal lands, with widths varying by land-managing agency. On BLM-managed lands, the permanent ROW would be 50 feet wide with a 100-foot-wide TUP corridor, while on USFS-managed lands, the permanent ROW would be 100 feet wide with a 50-foot-wide TUP corridor.

ATWS may be required for specialized construction activities, such as waterbody crossings, road or railroad crossings, horizontal directional drilling (HDD), steep slopes, or rocky terrain. ATWS locations and sizes would be determined based on site-specific construction needs.

Electrical power will be required for each pump station and MLV site. While the specific routing of electrical power lines has not yet been determined and will be developed by the applicable local electrical cooperatives, powerline infrastructure will be required to serve Project facilities and may cross BLM-administered lands. As such, associated utility lines would require separate right-of-way authorization from the BLM. Bridger will coordinate with the BLM and the applicable utility providers to identify and disclose proposed or approximate powerline corridors, as available, to support environmental analysis and permitting. All powerline facilities would be designed, permitted, and constructed by the responsible utility providers in compliance with applicable regulatory, environmental, and permitting requirements.

3.2.1 Above Ground Mainline Valves

Mainline valve locations were sited with consideration for environmental and land-use constraints, including sensitive resources such as greater sage-grouse and their associated habitat, where practicable. Siting decisions also consider operational, engineering, and safety requirements, including compliance with applicable Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations related to valve spacing. Project valve design and siting is intended to meet regulatory requirements while minimizing potential environmental impacts to the extent practicable. As additional field data is gathered, additional adjustments to final valve siting may occur.

The Project will include 72 above-ground MLVs, which are required for pipeline operation and safety. All MLV locations will be situated within the permanent ROW. Each valve site will occupy an area of approximately 40 feet by 200 feet within the permanent ROW and will be constructed on a gravel pad and enclosed by perimeter fencing for security and regulatory compliance. The maximum height of above-ground components at each MLV site (including valve components and perimeter fence) will be approximately 9 feet above the gravel surface. A typical above-ground MLV installation is illustrated in ***Figure 9: Typical Mainline Valve (Overhead View)*** and ***Figure 10: Typical Mainline Valve (Side Profile)***.

Six of the MLV's are proposed on federal lands, with the remaining 66 located on non-federal lands. Refer to ***Table 3: MLVs on Federal Lands.*** MLVs located on federal lands will be painted in accordance with BLM visual resource requirements, including the use of approved colors and standards. All gravel used for MLV installation will be sourced from approved commercial locations. These measures are intended to minimize visual impacts, enhance site safety, and comply with applicable federal land management requirements.

Figure 9: Typical Mainline Valve (Overhead View)

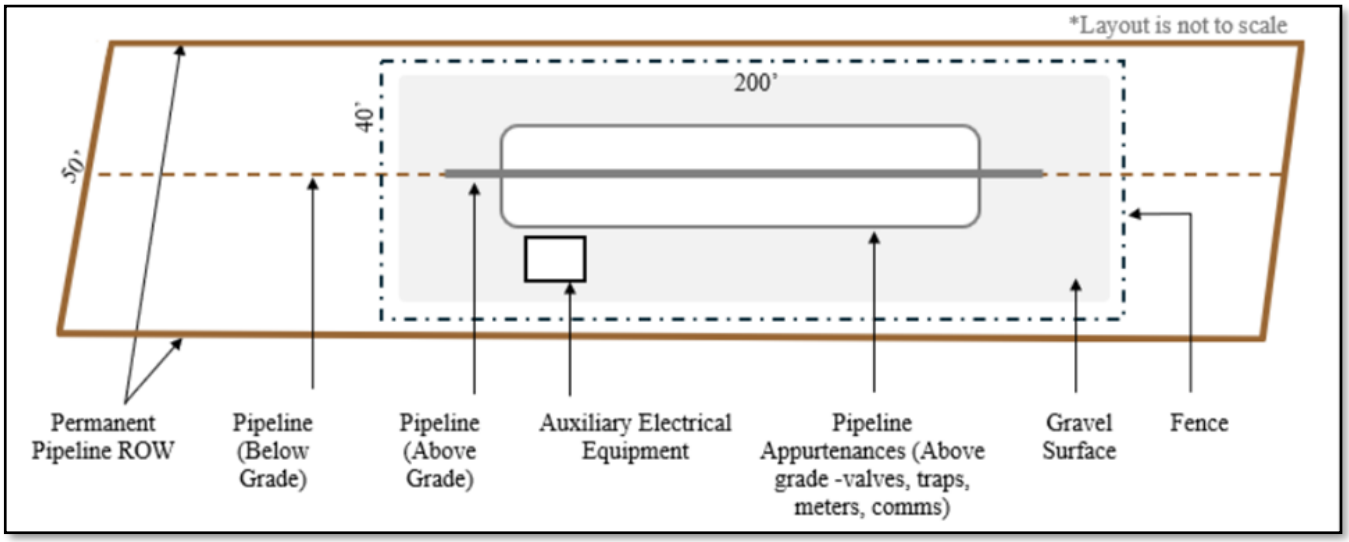


Figure 10: Typical Mainline Valve (Side Profile)

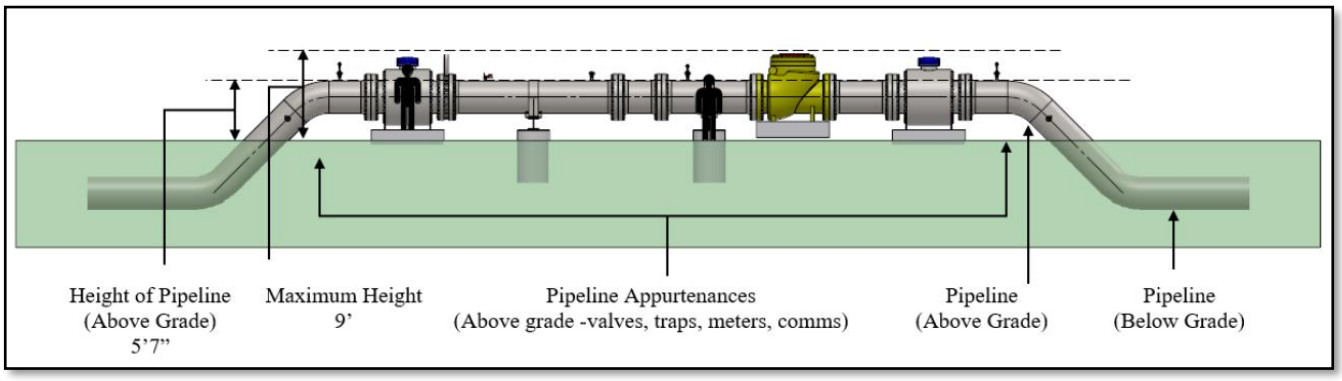


Table 3: MLVs on Federal Lands

MLVs on Federal Lands	Legal Location	State/County	Federal Ownership
MLV-1	Sec. 5, T37N, R32E	Montana/Phillips	BLM
MLV-3	Sec. 12, T34N, R34E	Montana/Phillips	BLM
MLV-6	Sec. 13, T35N, R36E	Montana/Valley	BLM
MLV-48	Sec. 23, T3S, R57E	Montana/Carter	BLM
MLV-51	Sec. 21, T9S, R57E	Montana/Carter	BLM
MLV-59	Sec. 26, T48N, R64W	Wyoming/Weston	BLM

3.2.2 Pump Stations

The Project will include eight pump stations to facilitate the movement of product through the pipeline. Each pump station will require a relatively flat pad surface approximately 600 feet by 600 feet in size located along the proposed pipeline ROW. Additional disturbance beyond the pad footprint will be required to accommodate fill slopes and site-specific topographic conditions, which will be determined following completion of detailed topographic surveys. Refer to ***Figure 11: Typical Pump Station***.

One pump station is proposed on federal surface, with the site being situated on BLM land near the U.S./Canada border. Refer to ***Table 4: Pump Station Locations.***

The facility has been intentionally positioned adjacent to existing disturbances, including an active pipeline corridor and an existing facility, to minimize new surface impacts and maintain development within an already industrialized footprint. Utilizing an area with established infrastructure reduces the need for new access routes, limits habitat fragmentation, and aligns with BLM's commitment to impact minimization through co-location of compatible facilities.

Figure 11: Typical Pump Station

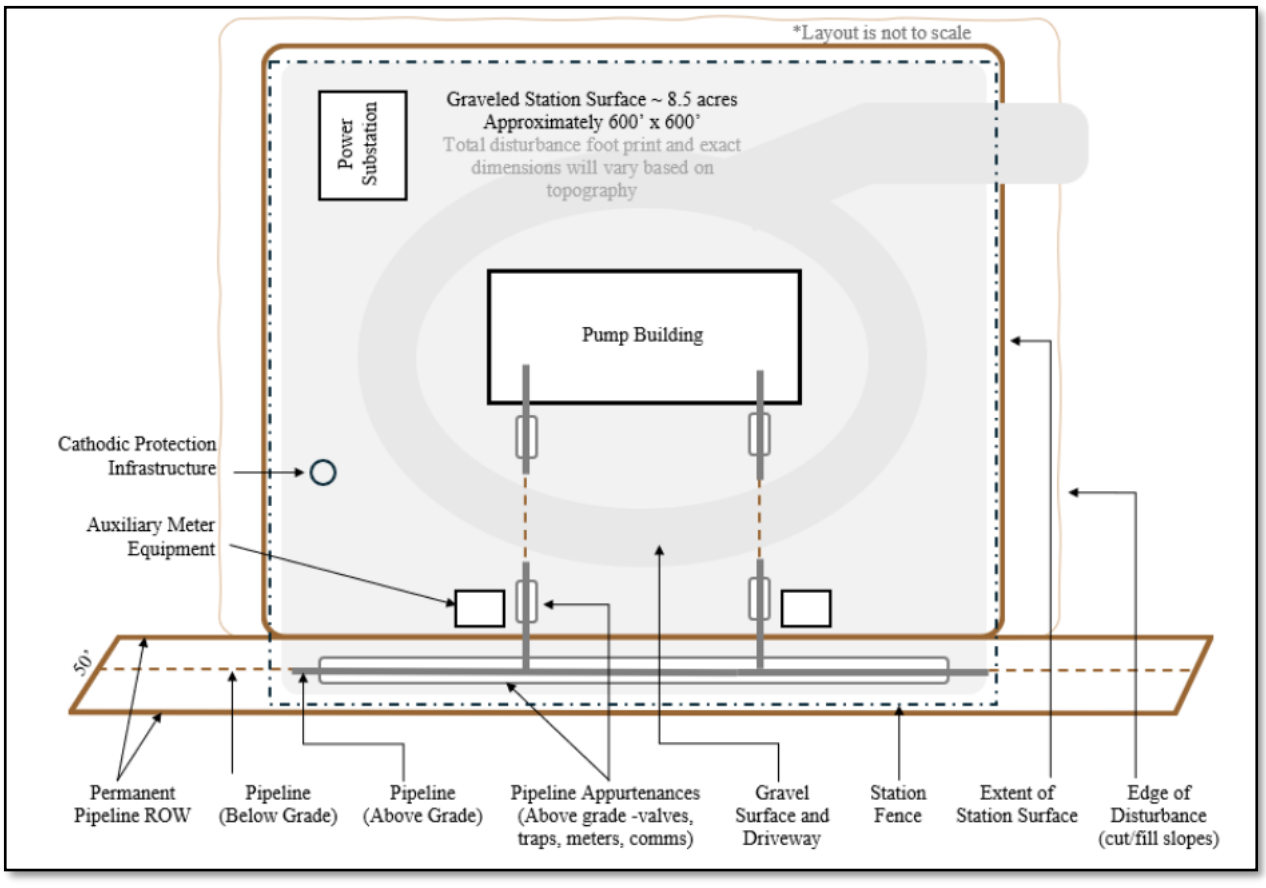


Table 4: Pump Station Locations

Pump Station	Legal Location	State/County	Federal Ownership
1	Sec. 5, T37N, R32E	Montana/Phillips	Yes (BLM)
2	Sec. 25, T35N, R44E	Montana/Daniels	No
3	Sec. 35, T32N, R58E	Montana/Sheridan	No
4	Sec. 26, T20N, R59E	Montana/Richland	No
5	Sec. 11, T8N, R58E	Montana/Fallon	No
6	Sec. 34, T5S, R57E	Montana/Carter	No
7	Sec. 7, T50N, R65W	Wyoming/Crook	No
8	Sec. 33, T38N, R62W	Wyoming/Niobrara	No

3.2.3 Delivery Facilities

No anticipated Project delivery facilities will be located on federal lands.

3.2.4 Access Roads

The Project will utilize existing roads, existing pipeline ROWs, and two-track trails to minimize new ground disturbance whenever feasible. Construction of new concrete or asphalt roads is not anticipated; however, newly constructed permanent improved access roads may be required to reach certain Project facilities. In addition, permanent ROW authorization may be required on select existing roadway segments located on BLM-administered lands where long-term access and maintenance activities are anticipated.

The Project is anticipated to include construction of one new permanent improved access road across federal lands. The newly constructed permanent access road would require a 60-foot-wide permanent ROW and be surfaced with gravel sourced from approved commercial locations, as necessary, to provide durable and reliable access. Bridger will maintain permanent access roads through routine grading and will provide snow removal as needed to allow for year-round access and reliable operations.

The access roads identified for the Project are based on preliminary planning assumptions. Additional analysis including evaluation of posted bridge weight limits, avoidance of sensitive environmental and cultural resources, landowner concerns, and incorporation of design-level refinements may require modification of the proposed access routes. As a result, access road alignment and configuration will continue to be refined throughout project design in coordination with the regulatory agencies and affected landowners.

Temporary access roads connecting construction areas on BLM-administered lands will require authorization under a TUP. The TUP construction corridor for temporary access roads will be approximately 60 feet wide to accommodate construction activities and associated reclamation needs. Access planning was informed by review of a one-mile-wide corridor, within which preliminary temporary access roads were identified to support construction. All temporary access roads would be reclaimed following construction in accordance with applicable BLM requirements and right-of-way stipulations. Refer to ***Table 2: Summary of Disturbance on Federal Lands*** for a breakdown of the permanent ROW and TUP, and ***Appendix H*** for a visual depiction of access road corridors on federal lands.

3.2.5 Temporary Extra Workspace and Staging Areas

During construction, the Project will require ATWS and staging areas. Locations and areas have not been finalized, however ATWS is necessary at HDD, or bore locations, to accommodate specialized equipment and construction activities, and staging areas will be required to be strategically placed along the route. Where possible, the pipeline ROW will be used, but additional space may be needed depending on alignment and direction of the approach to the bore site. For example, wetland and waterbody crossings, completed by HDD or bore, will require ATWS measuring

approximately 250 feet by 150 feet at the entry point and 150 feet by 150 feet at the exit points in addition to HDD pipe string staging, if not parallel to the ROW.

Beyond HDD sites, ATWS may also be needed for equipment laydown areas. (Locations where topographical or environmental constraints limit standard workspace, road or utility crossings, and for the safe maneuvering of construction vehicles and materials.) These areas are essential for efficient and safe construction operations and minimizing impacts to surrounding land/resources. While these additional areas may be necessary, the frequency and extent of ATWS would be minimized while on federal lands. Refer to ***Table 5: Typical ATWS.***

Table 5: Typical ATWS

Feature	Size	
	Typical Dimensions (Feet)	Acres
HDD: Waterbodies	HDD entrance 250 x 150, HDD exit 150 x 150	1.4
HDD: U.S./State Highway and Railroads	175 x 25 on working and spoil sides or 150 x 50 on working side only	0.2
HDD: Private, Township, or County Roads	125 x 25 on working and spoil sides or 125 x 50 on working side only	0.1
HDD: Buried Utilities	125 x 50	0.1
HDD: Pipe String Staging	TBD	TBD
Mobilization and Demobilization Areas	470 x 470	5.1
Vehicle Turnaround Areas	200 x 80	0.4

3.2.6 Pipe Storage and Contractor Yard

No pipe storage or contractor yards will be constructed on federal lands.

3.2.7 Borrow Material

No borrow pits would be sited on federal lands; no borrow material would be removed from the trench and utilized elsewhere on federal lands. All borrow material utilized for the Project would be sourced from commercial sources.

3.3 Alternatives

Developing the proposed route for the Project was done through an iterative, multidisciplinary route selection process. Included is systematic identification of objectives, control points, collection of data, sensitive resources and communities; review of alternatives; and reassessment as the route develops.

3.3.1 Major Route Alternatives

Major route alternatives have been reviewed as part of Bridger's route selection process. This resulted in the Project's decision to seek approval from BLM and USFS for the proposed route. Given the existing pipeline infrastructure in Canada and along the eastern border of Montana from approximately Sidney, Montana, south to a major hub at Baker, Montana, and south to Guernsey, Wyoming; the efficiency of a direct route from Canadian infrastructure corridor to U.S. (Montana) infrastructure corridor was the initial guide for forming major alternatives.

A No Action alternative, defined as an alternative in which the Project would not be constructed on BLM-administered lands and therefore would not require a BLM right-of-way, was considered as part of the route selection process. Under this alternative, the Project would either not be constructed or would require a fundamentally different configuration that avoids all BLM-managed lands. Due to the overall length of the Project, fixed origin and terminus points at the U.S./Canada border and the existing terminal near Guernsey, Wyoming, and the distribution of federal land ownership within the study area, a route that completely avoids BLM-administered lands is not feasible. As a result, the No Action alternative was eliminated from further consideration, as it would not meet the Project's purpose and need to provide a reliable and efficient crude oil transportation connection between existing infrastructure systems.

A reasonably direct route between the Project's origin and terminus may be achieved by three broad routing alternatives. While consideration was given to whether an alternative route could avoid BLM-managed lands entirely, the overall length of the Project and the fixed starting and ending points result in unavoidable intersections with BLM-administered lands. As a result, there is no feasible alternative that would completely avoid the need for BLM right-of-way authorization. ***Table 6: Mileage Summary for Major Route Alternatives*** provides a comparison of the three major route alternatives, including approximate total mileage and mileage across BLM-managed lands.

Table 6: Mileage Summary for Major Route Alternatives

Route Alternative	Approx. Total Mileage	Mileage Across Federal Lands
Option 1 (Proposed Route)	646.9	69.3
Option 2	552.7	109.1
Option 3	599.4	105.0

- Option 1) The proposed route traverses from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, by heading south (around known sensitive areas) for 25 miles. After, head easterly direction to the most northern pipeline/infrastructure near MT Highway 5 and MT Highway 16. Then route south to Guernsey, Wyoming following existing pipelines, infrastructure, and transmission pipelines.
- Option 2) Traverse from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, in the shortest path at a south/southeasterly direction to the major pipeline infrastructure near Baker, Montana. After, route south to Guernsey, Wyoming following existing transmission pipelines.
- Option 3) Traverse from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, in the shortest path at a south/southeasterly direction—to the most northern major pipeline infrastructure just north of Sidney, Montana. Then, route south to Guernsey, Wyoming following existing transmission pipelines.

Options 2 and 3 were evaluated during the route selection process but determined to be less feasible than Option 1 due to environmental, cultural, and constructability constraints.

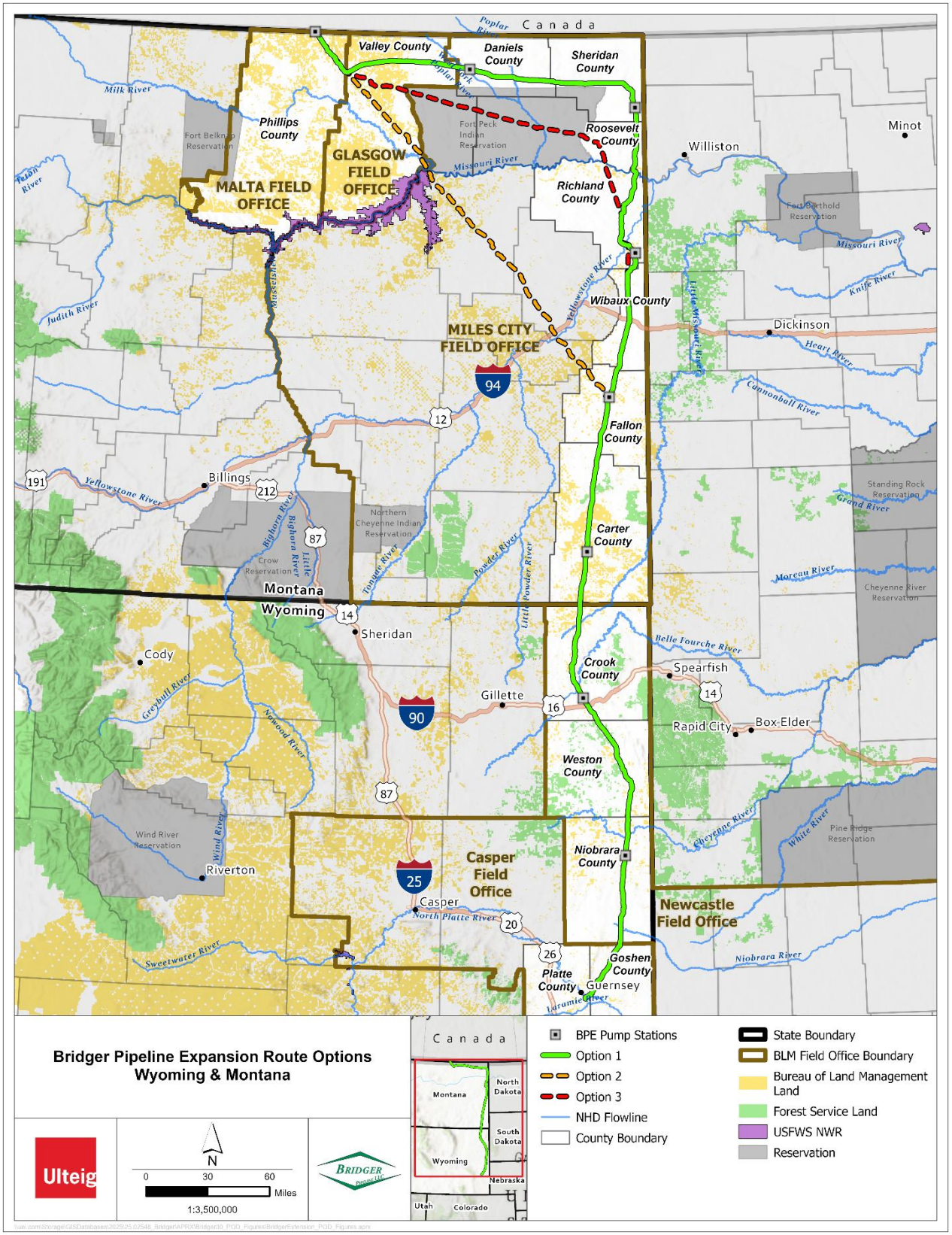
- Option 2 would cross BLM–administered lands and is located in close proximity to the Charles M. Russell National Wildlife Refuge and the Fort Peck Indian Reservation. These land ownership and proximity considerations would require careful resource avoidance during project development. In addition, limited existing access infrastructure and rugged terrain along portions of the route would necessitate additional temporary access construction, increasing surface disturbance and contributing to greater construction complexity relative to other options.
- Option 3 would have extensive interaction with sensitive resources, including significant crossing of the Fort Peck Indian Reservation and crossings of Bureau of Land Management–administered lands. These

land ownership considerations would require additional federal and Tribal authorizations and coordination. Collectively, these factors increase permitting complexity, engineering considerations, and the potential for environmental impacts. In addition, steep slopes and areas of unstable soils along portions of the alignment would require increased grading and enhanced erosion and sediment control measures, resulting in greater construction disturbance and potential long-term maintenance challenges.

Both alternatives would result in longer segments across BLM-managed lands compared to Option 1, creating additional regulatory requirements and land-use conflicts. These factors, combined with higher construction costs, longer timelines, and greater environmental impacts, led to the conclusion that Options 2 and 3 are not practicable.

The proposed Project is pursuing Option 1 to avoid significant sensitive and constrained areas. These include: on-and-off Reservation Tribal Trust lands, USFWS National Wildlife Refuges, and other key land-use restrictions. Option 1 allows Briger to avoid environmentally significant areas. In addition to consideration of major route alternatives, the proposed route will continue to make smaller, more minor adjustments to further refine the alignment with the same objectives in mind to reduce potential impacts on resources.
Refer to ***Figure 12: Major Route Alternatives.***

Figure 12: Major Route Alternatives



4 ROW Grant Application and Temporary Use Permit

4.1 ROW Grant

Bridger is requesting grants for permanent ROW across federal lands for the proposed pipeline. The Project will utilize a combined construction corridor of up to 150 feet in width on federal lands. On BLM-managed lands, the Project will utilize a 50-foot-wide permanent ROW and a 100-foot-wide TUP construction corridor. On USFS-managed lands, the Project will utilize a 100-foot-wide permanent ROW and a 50-foot-wide TUP construction corridor.

Table 7: ROW Requirements on Federal Land

Managing Agency	Permanent ROW Width	TUP Corridor Width/ Total Size	Combined Construction Corridor
Bureau of Land Management (BLM)	50 feet	100 feet	Up to 150 feet
U.S. Forest Service (USFS)	100 feet	50 feet	Up to 150 feet

Of the 72 MLVs proposed for the Project, six would be located on federal lands. One pump station located near the Canadian border would be situated on BLM-managed lands and would require approximately 11.2 acres of permanent ROW, overlapping the pipeline corridor where practicable. Refer to ***Table 3: MLVs on Federal Lands*** and ***Table 4: Pump Station Locations*** for a breakdown of facilities located on Federal Lands.

Existing roads, pipeline ROWs, and two-track trails would be used to the extent practicable to minimize new ground disturbance. Construction of concrete or asphalt roads is not proposed. The project includes construction of one new permanent access road across federal lands. The permanent road would be surfaced with gravel, sourced from approved commercial locations, to provide durable and reliable access while reducing environmental impact. Improved access roads would require a permanent ROW width of approximately 60 feet and would be designed and constructed in accordance with applicable BLM Gold Book standards, including a running surface and associated shoulders, drainage features, and disturbed areas necessary to support safe construction, operation, and maintenance activities. Refer to ***Table 2: Summary of Disturbance on Federal Lands*** for a breakdown of access roads on federal lands.

All temporary construction areas would be reclaimed following construction. Permanent ROW associated with the pipeline, pump station, MLVs, and permanent access roads would be maintained for the life of the Project. Upon decommissioning, all permanent above-ground facilities would be removed and disturbed areas reclaimed in accordance with applicable land use plans and agency requirements.

4.2 Temporary Use Permit

Bridger is requesting a TUP on federal lands to support various construction activities for the Project. The Project will utilize a TUP construction corridor up to 100 feet in width for pipeline construction, depending on the land-managing agency. The TUP corridor, together with designated temporary work areas and temporary access roads, would be used for equipment staging, material storage, construction activities, and crew access.

The anticipated duration of the TUP extends from the initiation of construction through successful revegetation of federal lands, with an estimated timeframe ranging from approximately 24 months up to a maximum of five years, depending on site-specific conditions and revegetation success.

The Project will require approximately 1,389.28 acres within the TUP corridor on BLM-administered lands and approximately 89.62 acres within the TUP corridor on USFS-administered lands. Bridger anticipates needing ATWS for waterbody or roadway crossings, areas with challenging terrain, and locations requiring truck turnarounds. Specific locations and dimensions would be identified during Project design. All areas disturbed under the TUP corridor will be restored following construction in accordance with applicable agency requirements and approved reclamation plans.

5 Plan of Development

This POD, with associated federal ROW application, serves as an initial step toward the forthcoming NEPA documentation. The Project will require preparation of either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). As the NEPA document, field surveys, and impact assessments advance, the POD will update with new findings and requirements.

Throughout the POD and its appendices, references are made to tables, maps, and other graphics that provide detailed information on the Project's ROW. These materials identify locations of roadway crossings, utilities, waterbodies, and designated temporary work areas. The level of detail and commitments described in this POD are intended to support federal land management agency review and forthcoming NEPA documentation and are applied consistent with land ownership, applicable permits, and agency jurisdiction.

5.1 Federal and State Agencies Involved

Surface disturbances, to federal and state lands during the Project will require various permits/approvals. The list below identifies the primary agencies expected to have jurisdiction or regulatory involvement in the Project:

Table 8: Federal Agencies Roles and Responsibilities

Agency	Roles/Responsibility
Bureau of Land Management (BLM)	Oversees impacts to BLM-administered lands, including split-estate; administers the Federal Mineral Leasing Act; leads Section 106 (NHPA), Section 7 (ESA) consultation, PRPA, Tribal consultation, and development of the Programmatic Agreement (PA).
U.S. Forest Service (USFS)	Oversees direct impacts to lands administered by the agency.
Bureau pf Reclamation (BOR)	Manages crossings of BOR-controlled irrigation canals.
U.S. Army Corps of Engineers (USACE)	Administers permitting for the Clean Water Act (CWA) and Rivers and Harbors Act.
U.S. Fish and Wildlife Service (USFWS)	Administers the ESA, Bald and Golden Eagle Protection Act (BGEPA), Migratory Bird Treaty Act; holds conservation easements along the route.
Pipeline and Hazardous Materials Safety Administration (PHMSA)	Administers federal pipeline and hazardous liquid safety regulations.

Table 9: State Agencies Roles and Responsibilities

Agency	Roles/Responsibility
Montana Department of Environmental Quality (MTDEQ)	Administers the Major Facilities Siting Act, air permitting, Section 401, and Montana Pollutant Discharge Elimination System (MPDES).
Montana Department of Natural Rources and Conservation (DNRC)	Manages State Trust Lands; administers navigable river/land use licenses, 310 Law, and the Montana sage-grouse program.
Montana Department of Transportation (MDT)	Issues U.S. and state highway utility encroachment permits.
Montana State Historic Preservation Office (SHPO)	Consults on Section 106 of the National Historic Preservation Act (NHPA).
Wyoming Department of Environmental Quality (WDEQ)	Administers air permitting, Section 401, and MPDES
Wyoming Department of Transportation (WYDOT)	Issues U.S. and state highway utility encroachment permits.
Wyoming Game and Fish Department (WGFD)	Administers state sage-grouse regulations.
Wyoming Office of State Lands and Investments (OSLI)	Direct impacts to lands managed by the agency.
Wyoming SHPO	Consultation on Section 106 of the National Historic Preservation Act.

5.2 Permits

The Project will require federal, state, and local permits. For a summary of potential federal, state, and local permits, refer to: ***Appendix G***. In addition, Bridger would coordinate with private entities (e.g., railroads, utility companies, and oil/gas companies) to comply with required crossing standards required. Project-specific requirements, including construction practices, reclamation standards, and monitoring obligations, will be implemented in accordance with the terms and conditions of applicable permits and landowner agreements.

6 Construction

The Project would be designed, constructed, tested, and operated in compliance with a comprehensive framework of federal, state, and local regulations. The primary federal authority is PHMSA, which enforces minimum safety standards under 49 Code of Federal Regulations (CFR) Part 195 for liquid pipelines and 49 CFR Part 192 for crude oil pipelines. The Project will also comply with Occupational Safety and Health Administration (OSHA) requirements, for worker safety, during construction and maintenance activities.

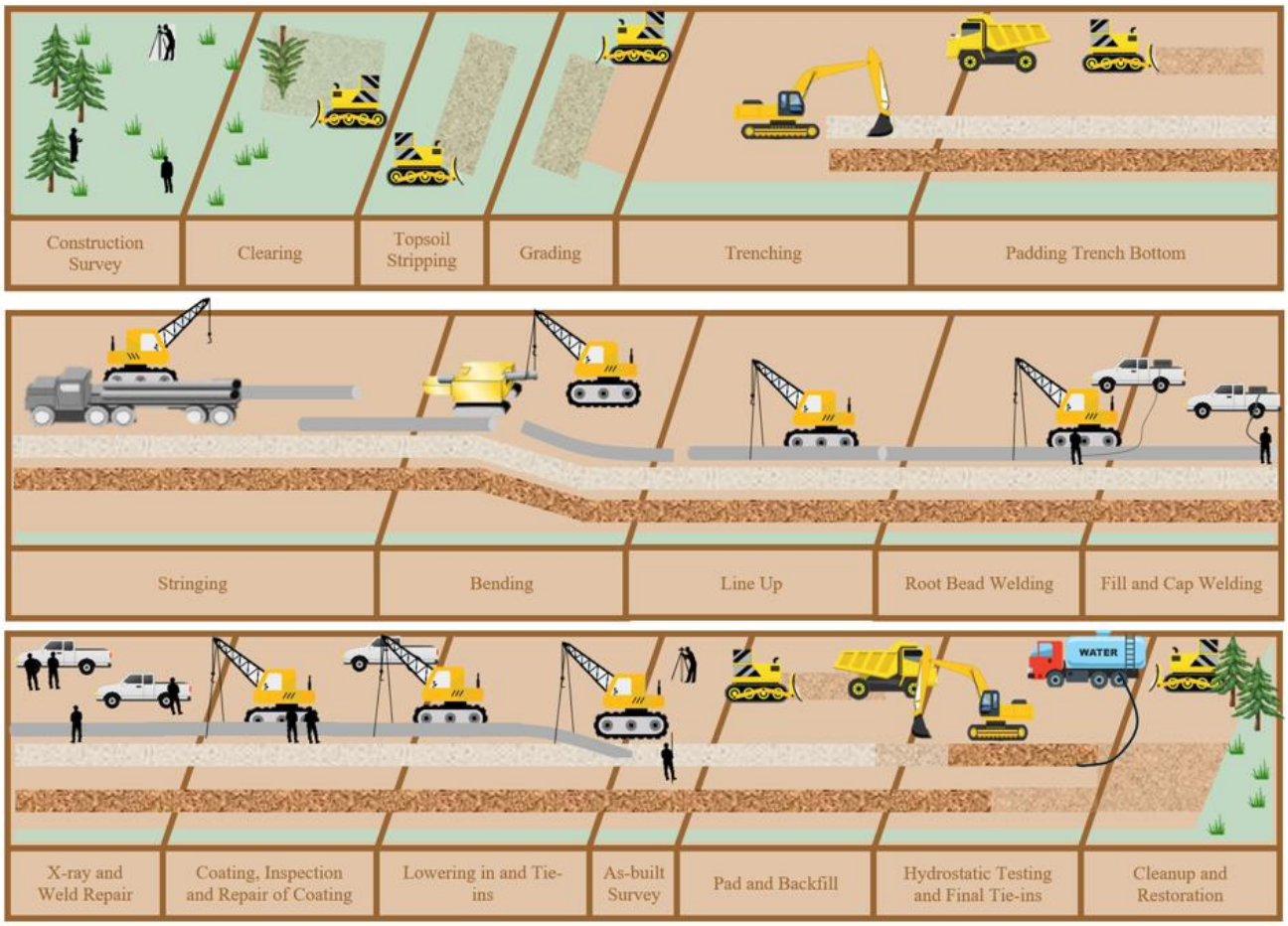
The Project will follow protocols outlined in federal regulations (40 CFR Part 112 for oil-spill prevention) and relevant state requirements. This includes National Pollutant Discharge Elimination System (NPDES) standards for potential spills during construction. Measures for spill prevention and containment are applied to all hazardous materials used or managed within the Project ROW and associated work areas during the project. This includes activities such as refueling and servicing equipment. All fuels, lubricants, chemicals, and hazardous materials (including wastes), will be stored in designated locations or appropriately within service vehicles. Storage sites will be situated in upland areas, at least 500 feet away from waterbodies/wetlands to minimize environmental risk.

Bridger has prepared a Construction, Mitigation, and Reclamation Plan (CMRP) that specifies strategies for avoiding, reducing, and mitigating impacts related to construction. Please refer to ***Appendix C***.

6.1 Pipeline Construction Process

This section describes the methods and protocols that will be followed to ensure safe, efficient, and environmentally responsible construction activities. By adhering to federal, state, and local regulations, the Project aims to minimize impacts on surrounding lands and resources while maintaining high standards of safety and operational integrity. Refer to ***Figure 13: Pipeline Construction Process.***

Figure 13: Pipeline Construction Process



6.1.1 Construction Survey

The process begins with survey and staking of the pipeline ROW, centerline, aboveground facilities, valve sites, ATWS, and avoidance areas (e.g., cultural sites, sensitive biological or botanical resources, wetlands). These markers guide subsequent activities like clearing, grading, and trenching to ensure construction disturbances remain within permitted boundaries.

6.1.2 Clearing, Topsoil Stripping, and Grading

This stage begins with the removal of all vegetation and other materials from the ROW. This includes trees and shrubs, large rocks, and topsoil to create a suitable work area. At the landowner's request, larger woody debris may be left on site or otherwise removed and mulched. After the topsoil is stripped, the ROW is leveled to ensure a smooth surface for construction. Both topsoil/subsoil are stockpiled on opposite sides of the permanent ROW, within the TUP corridor, to preserve soil quality for restoration. The depth of topsoil varies along the corridor, depending on soil type and landscape position, and may range from minimal to over a foot deep. Unless topsoil has already been stripped from the work location, all work must stop when soils are wet enough to form ruts greater than 4 inches deep, regardless of distance from established roads.

As vegetation is removed from the ROW, erosion control measures (such as straw wattles, silt fences, and fiber matting) will be installed to prevent soil loss and sediment runoff. In areas where water flow may impact the construction site, water bars and diversion ditches may be constructed to redirect water away from disturbed ground. Independent environmental inspectors will routinely monitor erosion-control installations, recommend maintenance/remedial actions, and conduct follow up observations of the maintenance/remediation.

6.1.3 Trenching and Padding Trench Bottom

Trench construction for pipeline installation would involve the use of trenching machines, bulldozers and track hoes. To meet regulatory requirements the trench is typically excavated to a depth that ensures a minimum of 48 inches of cover above the pipe. All work in/around the trench is performed in accordance with OSHA, state, and company safety standards. To minimize open-trench exposure, a limited section is left open ahead of backfilling—with the duration determined by safety considerations, weather, permit conditions, and landowner input.

Prior to lowering the pipeline into the trench, padding material is often placed along the bottom to provide a protective cushion between the pipe and the native soil. This padding typically consists of screened, fine-grained soil or sand that is free of rocks and other debris that could damage the pipeline coating. The use of padding helps minimize the risk of abrasion or punctures during installation and long-term operation, ensuring the integrity and longevity of the pipeline system.

6.1.4 Pipe Stringing, Bending, Welding, and Coating

After the ROW is prepared, pipeline joints are transported from storage to the ROW using specialized trucks. These joints, 40 and 80 feet in length typically, are distributed along the corridor by a team equipped with semi-trucks, side booms, and pickup trucks. A bending machine adjusts each segment to match the terrain, the pipe is lined up for welding, and certified welders, and/or automated welding machines join the sections using approved procedures. Welds are inspected with non-destructive-, x-ray methods. Any flawed welds are cut out and re-welded to ensure integrity. For open-trench installations, the pipe is coated with Fusion Bond Epoxy before delivery—while segments intended for HDD receive an additional abrasion-resistant layer before delivery. All coatings are thoroughly checked prior to lowering the pipe into place. These activities require coordinated crews and equipment. This includes welding rigs, side booms, non-destructive testing units, and support vehicles, to ensure safe and efficient assembly of the pipeline.

6.1.5 Lowering in and Backfilling

After welding, coating, and inspecting the pipeline sections, side booms are used to carefully lower the pipe into the prepared trench. To protect the pipeline coating, flexible, non-metallic slings are utilized during placement, and bedding material may be added to the trench base as needed. Any water found in the trench is pumped out. Discharge is filtered (through hay, straw bales, or silt bags) before being returned to the soil. If there is suspicion that the water contains contaminants, it is removed from the site and disposed of at an approved facility.

Prior to backfilling, an as-built survey is conducted to accurately document the final position of the pipeline within the ROW. This survey ensures that the installed pipeline location matches design specifications and provides a permanent record for future reference and regulatory compliance. Once the pipeline is securely placed in the trench, the excavation is refilled using the native soil, if appropriate, that was originally removed. First, the subsoil is returned and compacted, followed by the topsoil. This method ensures proper support and compaction around the pipeline—helping to protect its coating and maintain long-term stability.

6.1.6 Hydrostatic Testing

Hydrostatic testing will be performed to confirm the integrity of the pipeline before it is placed into service. This procedure will encompass the entire Project. Individual segments are tested between valve sets. The anticipated water volume per hydrotest section would be approximately 5,280,000 gallons. Water will be sourced from landowners, commercial sources (e.g., reservoirs and wells), or from municipal supplies. Fresh water may be reused between construction segments and conveyed along the pipeline corridor as practicable. All water

sourcing, reuse, and conveyance activities will be conducted in accordance with applicable permits, approvals, and landowner agreements. No water sources or hydrostatic test discharges are proposed on federal lands.

After testing, hydrostatic test water will be discharged at approved locations near the source or back into the source waterbody (in compliance with NPDES permit conditions). Discharges will be managed using Bridger approved energy dissipation devices and erosion control measures (e.g., rock aprons, diffusers, or vegetated filters). This minimizes velocity and prevents erosion or sedimentation at the point of release. Water will be allowed to infiltrate into the soil or evaporate naturally within the approved discharge area.

No chemical additives, detergents, or biocides will be introduced into hydrostatic test water. All test water will be visually inspected prior to discharge to ensure it is free of visible oil, grease, or other contaminants. If water quality issues are identified, additional treatment or containment measures will be implemented in accordance with permit conditions. All hydrostatic test water withdrawal, and discharge activities, will comply with applicable NPDES and state issued discharge permits. Implementation of these measures will ensure that potential impacts to surface water quality, aquatic organisms, and riparian habitats are temporary and minor in magnitude.

6.1.7 Final Tie-ins

Upon completion and approval of the appropriate segment hydrotests, the north end of the project would be tied-in to pipeline infrastructure at the US/Canada border. Upon completion and approval of the appropriate segment hydrotests, the south end of the project would be tied-in to the existing oil storage and transportation hub at Guernsey, Wyoming.

Following successful segment hydrostatic testing and final segment tie-ins, Bridger will carry out a "proving" procedure. This process, which generally involves the use of compressed air or mechanical pigs, is designed to verify both the mechanical integrity and internal condition of the pipeline segment. Once pipeline segments successfully pass this proving phase, they will be slowly filled with crude oil in a controlled manner, with close monitoring of pressure and flow rates throughout the process to promptly identify any irregularities. After all commissioning steps are completed, and documentation is reviewed, the pipeline is officially placed into service. Ongoing monitoring (plus maintenance routines) will be established to ensure safe, reliable, and environmentally responsible operation from the first day of service onward.

6.1.8 Cleanup and Restoration

Cleanup and reclamation efforts focus on restoring the land to pre-construction conditions. These efforts include removing construction debris, regrading the ROW, reestablishing natural contours, and installing permanent erosion control devices. All disturbed areas are stabilized and reseeded with appropriate vegetation to prevent erosion. This excludes agricultural areas or where otherwise specified by landowner stipulations. Reseeding efforts will comply with all applicable federal, state, and local requirements. Temporary access roads/ATWS would be rehabilitated, and any fencing or exclusion zones installed for environmental protection would be removed. Ongoing monitoring ensures reclamation measures are effective. Additional actions will be implemented, if needed, to address any remaining impacts. Please refer to ***Section 8, Stabilization and Reclamation*** and the Reclamation Monitoring Plan**,** located in ***Appendix F,*** for additional information.

6.1.9 Additional Construction Requirements

Sensitive areas such as rivers, roads, wetlands, and other features (unsuitable for conventional trenching) are crossed using HDD. HDD minimizes surface disturbance by limiting construction impacts to entry and exit points. This leaves the intervening land undisturbed. The HDD process consists of three main stages: 1) drilling a pilot hole along the planned path; 2) enlarging the bore with progressively larger reamers; 3) and finally pulling the welded and coated pipeline through the completed bore. Accurate instrumentation would be used throughout drilling to monitor the pilot hole's position and drilling parameters. During installation, the pipe is supported to avoid ground contact and subjected to pressure tests. The contractor would manage tensile, and bending, stresses and restore all excavated areas using approved materials. In areas where HDD is utilized, the pipe size will be upsized from the mainline (0.500-inch wall thickness) to 0.625- to 0.7500-inch wall thickness.

The Project will require a substantial workforce and equipment base. This scale will be determined as the Project design progresses. Initial estimates assume approximately 400 personnel per construction spread including: operators, welders, inspectors, laborers, and support staff. Equipment needs will vary by terrain/spread configuration, but are expected to include excavators, sidebooms, welding rigs, pipe layers, and support vehicles. The workforce and equipment projections will be further defined following award of construction contracts to contractors. Refer to ***Section 6.5, Construction Schedule and Workforce*** for additional information regarding workforce estimates.

6.2 Special Construction Procedures

6.2.1 Road, Highway, and Railroad Crossings

Construction activities involving road crossings will adhere to the specifications outlined in crossing permits and approvals secured by Bridger. On federal land, the majority of roadways encountered are expected to be smaller, unpaved roads or approaches. Where permitted by local authorities or property owners, these roads will be crossed using the open-cut technique, which necessitates temporarily closing the road. Typically, open-cut crossings are completed and the road returned to service within one to two days. To maintain safety and limit traffic interruptions, Bridger will implement measures like posting signage at crossing sites, and developing traffic management plans, as required by regulations.

For roads where the open-cut method is not permissible, the pipeline will be installed by HDD underneath the roadway. Described in **Section 6.2.9**, this process involves excavating pits on either side of the road, and drilling/reaming the borehole to match the size of the pipe. Once the borehole is complete, a section of pipe is inserted through it. Boring typically causes little to no disruption to road traffic and is usually finished within one to two days.

Bridger will bore all public improved roads using HDD to minimize traffic disruption and maintain roadway integrity. For private or landowner roads, HDD will be used where the road is actively in use; otherwise, open-cut may be employed with landowner consent. Specific crossing methods for each roadway will be identified during detailed design and included in the NEPA documentation and crossing permit applications. Transportation resources and traffic control are further described in **Section 7.9.1.**

6.2.2 Steep Terrain

The pipeline route has been designed to avoid or limit crossing areas with >15% slope, where possible. In areas where steep terrain is unavoidable, benches or terraces may be constructed to create stable work platforms for equipment and personnel. To prevent trench collapse, trench boxes, shoring, or other stabilization methods may be used, and trench breakers, slope drains, permanent slope breakers, or other erosion control measures may be implemented. Refer to ***Figure 14: Typical Trench Breaker*** and ***Figure 15: Permanent Slope Breakers..***

Table 10: Trench Breaker Spacing Requirements

Slope	Spacing (ft)
5 to 15%	300
>15 to 30%	200
>30%	100

Temporary slope breakers (also called interceptor dikes, diversion berms, or water bars) typically are mounded soil or sandbags, silt fence or staked hay or straw bale berms extending across the disturbed area or ROW at discharge locations or across any outfall channel. They are designed to move water off, or slow its movement down, the ROW. Tighter permanent and temporary slope breaker spacing will be required in construction/reclamation units with steep slopes and rugged topography. Refer to: ***Table 10: Trench Breaker Spacing Requirements.***

Figure 14: Typical Trench Breaker

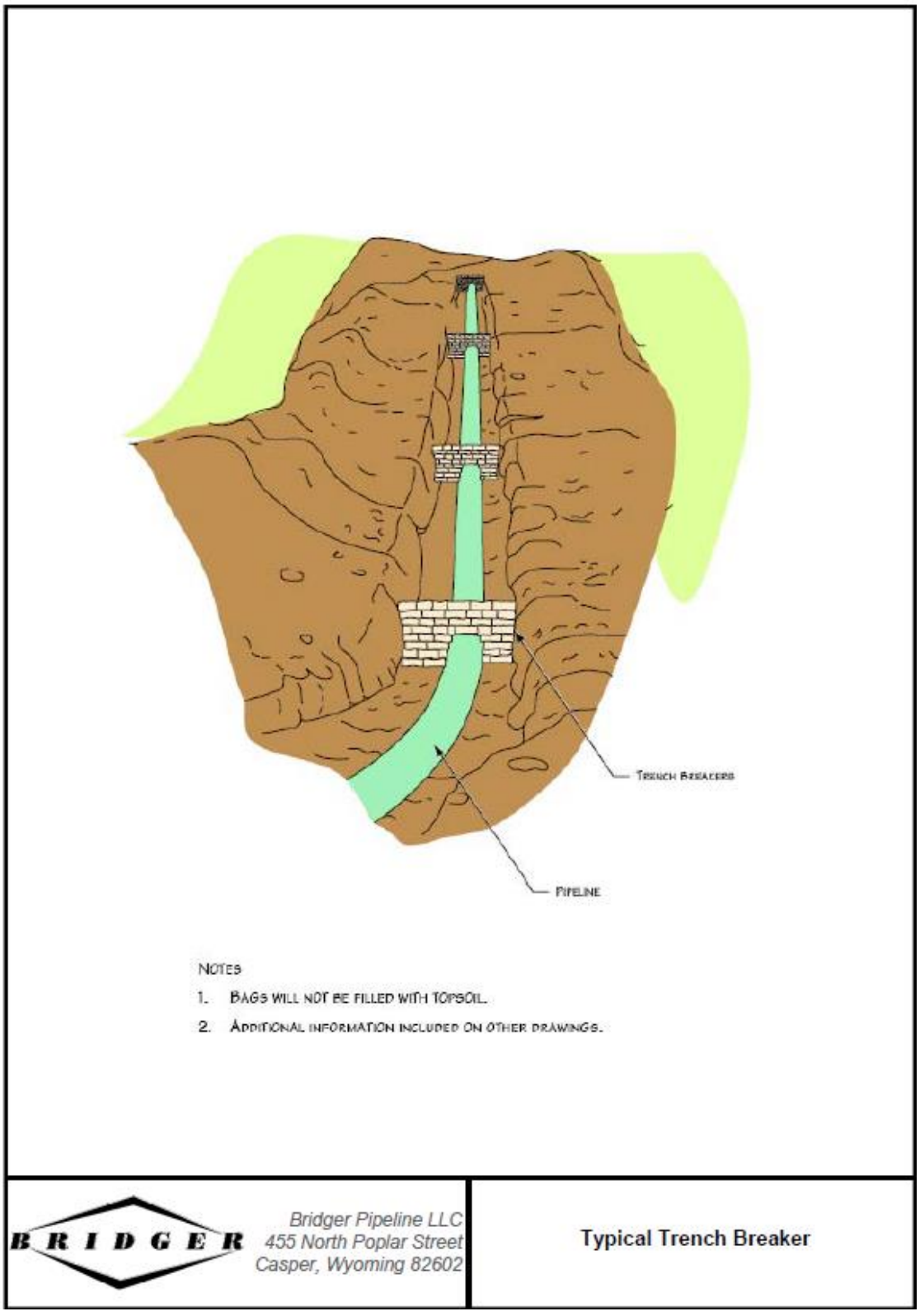
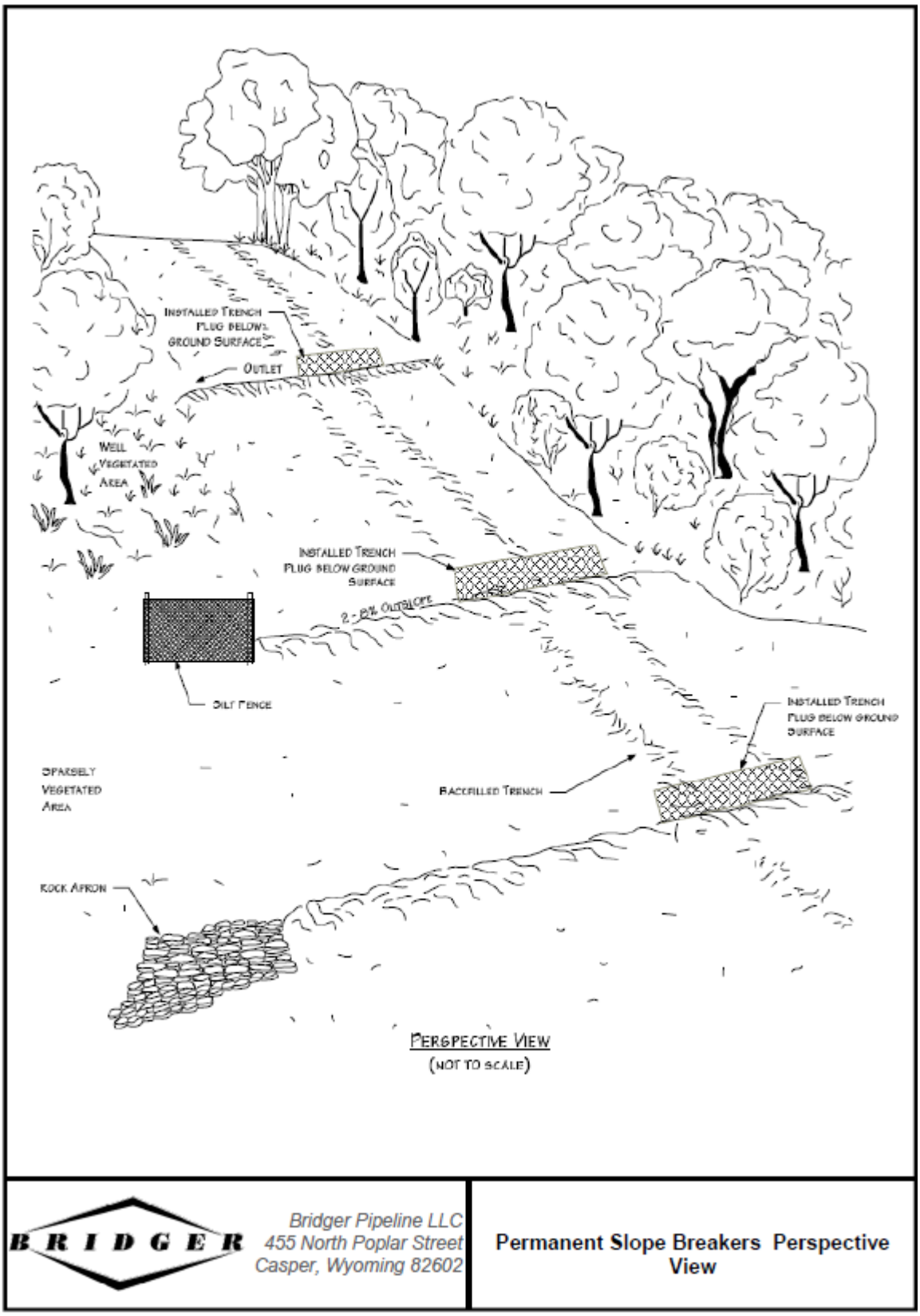


Figure 15: Permanent Slope Breakers



6.2.3 Waterbody Crossings

Bridger has initiated aquatic resource delineations along the Project corridor and is set to finish by November 2026. After completion, Bridger will choose the appropriate crossing method, identify necessary bores, and determine location and type of required erosion control devices. Perennial, intermittent, and seasonal streams, plus permanent or seasonally flooded wetlands will be crossed using HDD. Ephemeral drainages, and temporary wetlands may use open trench or HDD, determined on a case-by-case basis. HDD will use environmentally safe fluids, ensure fluid containment/disposal per regulations, and prompt response to any issues.

All work near waterbodies will include site-specific BMPs (e.g., straw wattles and silt fences) to limit erosion and sediment. Timber matting will be used for vehicle crossings. No maintenance/refueling will occur within 500 feet of aquatic resources with exception for pumps and HDD equipment operating within or near aquatic resources. In these instances, specific BMPs will be implemented as identified in the SPCC and CMRP. If in-water work with equipment is needed, Bridger will coordinate with the appropriate state agencies to meet aquatic nuisance species requirements.

6.2.4 Blasting

No blasting or other use of explosives is anticipated as part of the project.

6.2.5 Residential and Commercial Construction

No construction is anticipated within developed residential or commercial areas. The Project route was developed using a route-selection process (see Section 3.4.1) that prioritized avoidance of urban areas, rural communities, and other high-value or sensitive land uses. By siting the route primarily through rural and undeveloped lands, potential conflicts with residences, commercial structures, or other buildings were minimized. Where construction activities occur near structures such as outbuildings, appropriate construction methods and BMPs will be implemented to reduce potential impacts.

6.2.6 Fencing and Grazing

Grazing allotments and associated permitted infrastructure (e.g., fences, gates, cattle guards, and water pipelines) on BLM- and USFS-administered lands will be maintained during construction. Bridger will coordinate with grazing permittees to minimize impacts to permitted grazing operations; however, some temporary impacts may be unavoidable. Ongoing permit operations will be accommodated during construction where feasible, and disturbed permit operations and associated infrastructure will be reestablished following construction. Any livestock facilities (e.g., gates, cattle guards, corrals, fences, and water sources) damaged or rendered inoperable as a result of Project activities will be repaired or replaced in accordance with applicable BLM or USFS specifications on their respective administered public lands.

A dedicated fencing crew will install gates at each point where the pipeline ROW crosses a fence. Fences crossing the project workspace will be braced, cut, secured to prevent any slacking of the fence, and temporarily fitted with gates to permit construction traffic passage. During construction, the openings will be controlled to prevent escape of livestock. Care will be taken to not obstruct or damage existing gates or cattle guards. Access will be maintained throughout construction. After construction, fences will be repaired to their pre-construction conditions.

In areas identified as environmentally sensitive, such as protected cultural sites, additional safeguards will be implemented to prevent inadvertent disturbance. These areas will be clearly marked and fenced as exclusion zones, and construction activities will be prohibited within their boundaries. Exclusion fencing will be used solely for this purpose and will be removed following completion of construction.

6.2.7 Fueling

All bulk quantities of diesel fuel and gasoline will be stored on site in contractor storage areas, which would not be located on federal lands. Adequate spill containment measures would be installed before fuel storage tanks are filled, and the spill containment measures would be maintained throughout the duration of the Project. Vehicles

and equipment refueling will occur along the length of the project, including federal, state, and private lands. No refueling would occur within 500 feet of aquatic resources, with exception for pumps and HDD equipment operating within or near aquatic resources. In these instances, specific BMPs will be implemented as identified in the SPCC and CMRP.

6.2.8 Access Roads

The Project is anticipated to include construction of one new permanent improved access road across federal lands. The newly constructed permanent access road would require a 60-foot-wide permanent ROW and be surfaced with gravel sourced from approved commercial locations, as necessary, to provide durable and reliable access. Bridger will maintain the permanent access road through routine grading and will provide snow removal as needed to allow for year-round access and reliable operations.

Temporary access roads connecting construction areas on BLM-administered lands will be located within a defined TUP area based on existing conditions. Where access occurs along existing improved roads or existing unimproved trails or access routes, a TUP of approximately 60 feet in width will be utilized to accommodate construction activities and associated reclamation needs. All temporary access roads will be reclaimed following construction in accordance with applicable BLM requirements and ROW stipulations. Refer to ***Table 2: Summary of Disturbance on Federal Lands*** for a breakdown of access road disturbances on federal lands.

Gravel used for construction of the new permanent access road or maintenance of existing roads would consist of a mixture of coarse crushed rock or stone combined with fine sand and clay. The larger crushed rock or stone typically would range between 0.25 and 2.0 inches in diameter. All gravel used for the Project would be sourced from approved commercial locations. Construction of concrete or asphalt roads is not anticipated. No gravel or other material potentially containing erionite would be used on the Project.

6.2.9 Existing Infrastructure

The Project route crosses areas with existing infrastructure, including pipelines, fences, gates, water facilities, and other range improvements. Bridger will avoid disturbance to existing infrastructure wherever practical. Where avoidance is not feasible, Bridger will coordinate with facility owners and the applicable federal agency to minimize impacts and restore or replace affected features in accordance with facility owner requirements, applicable federal agency direction, and ROW stipulations.

Specific measures will include:

- Identifying existing infrastructure during pre-construction surveys.
- Installing temporary fencing and gates to maintain livestock control and property access. Temporary fencing will not restrict livestock access to existing stock water sources
- Providing escape ramps in open trenches within active grazing areas.
- Repairing or replacing damaged fences, gates, or range improvements promptly and to pre-construction condition or better.
- Coordinating with grazing permittees regarding timing of construction to minimize disruption to grazing operations.

Liability for damages or replacements will be addressed through landowner agreements and applicable federal ROW requirements. Detailed procedures for avoidance, minimization, and restoration will be included in the CMRP and refined during the NEPA process.

6.2.10 Nighttime Work and Lighting

Nighttime work is not anticipated under normal construction schedules; however, limited nighttime activities may occur under exceptional circumstances (e.g., safety-critical tie-ins, HDD operations, or schedule recovery). If nighttime work is required, Bridger will implement measures to minimize impacts on wildlife, including migratory

birds and nocturnal species, consistent with BLM Technical Note 457 (*Night Sky and Dark Environments: Best Management Practices for Artificial Light at Night on BLM-Managed Lands*) and applicable conservation plans. These measures include:

- Limiting nighttime work to essential activities only and notifying BLM prior to commencement.
- Using fully shielded, downward-directed lighting fixtures to minimize light spill and sky glow.
- Employing warm-spectrum LEDs (<3000K) and motion sensors or timers where feasible.
- Implementing "Lights Out" practices during peak migration periods (spring and fall) to reduce disorientation and collision risk for birds.
- Prohibiting nighttime work within designated sage-grouse and big game winter ranges during restricted periods (December 1–March 15 and March 15–June 15 for sage-grouse; December 1–May 15 for pronghorn and other big game) unless approved by BLM.

These measures will be detailed in the CMRP.

6.2.11 Winter Construction

Winter construction will be completed using defined, task specific BMPs following industry standards from the Interstate Natural Gas Association of America (INGAA) Foundation that address snow, frozen soils, compaction, and reclamation in a measurable way. Snow will be plowed or blown only within approved access roads and the right of way. Snow will not be pushed into streams, ditches, or culverts, and designated snow storage areas will be located where meltwater can be controlled. Topsoil will always be stripped and separately stockpiled from subsoil. During frozen conditions topsoil will be peeled and removed using multiple passes and specialized equipment. Topsoil and subsoil piles will be protected as needed to prevent snow and ice buildup. Trenches will be cleared of snow and ice before lowering in, backfill will use unfrozen spoil from the interior of stockpiles wherever possible. Frozen clods will be broken down or screened using specialized equipment and placed in controlled lifts to be compacted to project specifications. Where compaction cannot be achieved, the location will be documented for targeted inspection, re compaction, additional fill, or re grading as needed after thaw. Throughout construction and into spring melt, qualified inspectors will check snow management, compaction and trench backfill performance, erosion controls, and topsoil integrity, and any subsidence, erosion, or off-site sediment will be corrected in coordination with landowners and regulators.

6.3 Aboveground Facilities Construction

Construction of MLV will be conducted concurrently with pipeline construction. Any MLV facilities sited on federal lands would include grading, installation of piping and mainline pipe, security fencing, and reclamation. Depending on the MLV location, permanent access roads may be required.

6.4 Construction Schedule and Workforce

6.4.1 Construction Schedule

Construction activities for the Project will commence following receipt of all required permits, authorizations, and approvals, which is anticipated to occur in July 2027. Construction of the Project is anticipated to last approximately 12 to 18 months, with no seasonal construction shutdowns. While construction will proceed year-round at the project level, certain activities or segments of individual construction spreads may be limited, modified, or temporarily deferred in specific locations to comply with seasonal and resource-specific timing restrictions applicable to sensitive environmental resources.

The Project will be organized into distinct construction spreads, with the number and sequencing of spreads dependent upon the final construction schedule and applicable timing constraints. Currently, the Project is anticipated to be organized into a minimum of four construction spreads, which would be implemented concurrently where allowable, including across federal lands, while accommodating location-specific timing restrictions.

Bridger anticipates construction crews will complete roughly 20 miles of pipeline per month, which is the benchmark used for project scheduling. The anticipated construction timeline will be determined during project design.

- **Site Preparation:** The contractor will mobilize equipment and staff to the site and conduct clearing, grading, pipe stringing, and trenching activities. Typical timeline for this task is approximately five miles per week.
- **Pipeline Assembly:** After the pipe stringing has been completed, production welding and non-destructive testing will occur. Typical timeline for this task is approximately five miles per week; however, pipeline assembly will only occur for 9 to 12 months of the overall project.
- **Installation and Backfill**: Installation and back fill include lowering the pipeline into the trench, pipeline tie-ins, and backfilling. Typical timeline for this task is approximately five miles per week; however, trenching activities will only occur after the pipeline has been welded.
- **Reclamation:** Reclamation includes reseeding of temporarily disturbed areas and final ROW cleanup. All seeding and reclamation activities will be conducted in compliance with the applicable BLM and USFS Resource Management Plans, including approved seeding and reclamation windows. Final reclamation may be affected by seasonal weather conditions; the timeline assumes no weather-related delays. The typical reclamation rate is approximately five miles per week.
- **Testing:** Hydrostatic testing is typically completed for sections between mainline valves. Typical timeline for this task is variable and dependent upon the length between mainline valves.
- **Demobilization:** Upon completion of the project, the contractor removes all equipment and demobilizes from the Project. Typical timeline for this task is approximately four work weeks.

Typical work schedules are anticipated to be 6 days per week, with start and end times likely dependent upon daylight hours; however, crews working on HDD would operate 24 hours per day for the duration of each bore. The daily and weekly schedule may change based on overall construction timeframe, seasonal changes, and weather constraints. Possible daylight morning and evening timing stipulations could take effect in areas for sensitive wildlife resources, such as near sage-grouse leks.

Construction activities are anticipated to occur primarily during daylight hours; however, limited nighttime work may be required under exceptional circumstances, such as safety-critical tie-ins, HDD operations, or schedule recovery. If nighttime work occurs, Bridger will implement measures to minimize impacts on wildlife, visual resources, and recreation consistent with BLM Technical Note 457 (*Night Sky and Dark Environments: Best Management Practices for Artificial Light at Night on BLM-Managed Lands*). These measures may include:

- Limiting nighttime work to essential activities only and notifying BLM prior to commencement.
- Using fully shielded, downward-directed lighting fixtures to minimize light spill and sky glow.
- Employing warm-spectrum LEDs (<3000K) and motion sensors or timers where feasible.
- Implementing "Lights Out" practices during peak migration periods (spring and fall) to reduce disorientation and collision risk for birds.
- Prohibiting nighttime work within designated sage-grouse and big game winter ranges during restricted periods (December 1–March 15 and March 15–June 15 for sage-grouse; December 1–May 15 for pronghorn and other big game) unless approved by BLM.

These commitments will be documented in the CMRP and coordinated with the BLM prior to implementation.

6.4.2 Workforce

Encompassing both construction and inspection roles, each construction spread is projected to employ approximately 400 workers, with an anticipated total of 1,600 workers across 4 spreads. Estimated workforce breakdown for each spread is included in ***Table 11: Workforce.***

Table 11: Workforce

Crew Type	Approx. Number of Workers
Survey	10
Ground Preparation	50
Pipeline Assembly	150
Installation and Backfill	105
Testing and Reclamation	50
Support Labor	35
Total	**400**

To support workforce needs, the Project's contractors and subcontractors will prioritize hiring temporary construction staff from local communities whenever possible. It is anticipated that the traveling construction workforce will primarily utilize existing hotels and short-term rentals in nearby communities, including Malta, Scobey, Plentywood, Culbertson, Sidney, Glendive, Wibaux, Baker, or Broadus, Montana; Williston or Beach, North Dakota; Hulett, Moorcroft, Sundance, Upton, Newcastle, Lusk, or Guernsey, Wyoming; or Edgemont, South Dakota. Other temporary housing options may include campgrounds located along the Project route. Temporary man camps may also be utilized, if necessary, but would be limited to private lands and would not be located on federal lands. Bridger is not proposing to construct or operate Project-specific workforce housing; contractors will be responsible for meeting their workforce housing needs.

6.5 Pipeline Design Features

The Project will extend for approximately 646.9 miles. It will be constructed of steel and designed to transport crude oil from a connection point at the U.S./Canada Border in Phillips County, Montana, to an existing terminal near Guernsey, Wyoming. The 36-inch-diameter pipeline will be situated within a permanent ROW that is 50 feet wide on BLM lands and 100 feet wide on USFS lands. The Project will be engineered to deliver a nominal capacity of around 550,000 barrels per day (bpd), however the proposed pipeline size with additional pump stations can move up to 1.13 million bpd.

The pipeline will be installed in accordance with federal regulations for hazardous liquid pipelines, specifically meeting the minimum depth of cover requirements outlined in 49 CFR 195.248. When utilizing bore or HDD methods for crossing waterbodies, wetlands, roads, railroads, and other sensitive features, the minimum pipe depth of cover may increase to 20 feet or greater, depending on site-specific design requirements. All aspects of the pipeline's design, construction, and operation will adhere to applicable U.S. Department of Transportation (USDOT) standards. Specifically, the Project will comply with standards outlined in 49 CFR Part 195 for hazardous liquids and 49 CFR Part 194 for onshore oil pipeline response plans. These regulations cover a broad range of requirements including general safety, incident reporting, design and construction standards, pressure testing, operational protocols, personnel qualifications, and corrosion prevention.

The Project will adhere to relevant industry standards including American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), and American Society for Testing and Materials (ASTM). Key design parameters are summarized in ***Table 12: Project Design Parameters,*** including a maximum temperature rating of 250°F and a maximum operating pressure of 1,440 psig, with typical operations ranging from 60°F and 150 to 1,375 psig. Pipe wall thickness would be 0.500-inch for line pipe and 0.625 to 0.750-inch for HDD pipe.

Table 12: Project Design Parameters

Parameter	Value
Pipe Specifications	Line Pipe: 36-inch outside diameter high-strength steel (API 5L X70 PSL-2) HDD/Bore Pipe: 36-inch outside diameter high-strength steel (API 5L X70 PSL-2)
Coating	Line Pipe: 14-16 Mils Fusion Bonded Epoxy (FBE) coating (minimum) HDD/Bore Pipe: 14-16 Mils FBE coating and 30 Mils Abrasion Resistant Overcoating (minimum)
Maximum Operating Pressure	1,440 psig
Depth of Cover	Typically 48 inches of cover
Pipe Wall Thickness	Line Pipe: 0.500-0.600-inch wall thickness HDD/Bore Pipe: 0.625 – 0.750-inch wall thickness, or as HDD crossing design requires.
Mainline Valves	72 MLV's would be installed along the route, six would be placed on Federal lands.
Pump Stations	Eight pump stations would be installed. One would be placed on Federal lands.
Leak Prevention Program	Multiple overlapping and redundant systems, including: • Epoxy pipe coating • Cathodic protection • One-Call Damage Prevention Program • Supervisory control and data acquisition (SCADA) monitoring • InLine inspection (smart pigs) • Periodic ROW patrols
Telemetry for remote Monitoring and Control	Telemetry and communications equipment will be installed to allow for 24/7/365 monitoring and control of the pipeline via SCADA network.

6.6 Spill Prevention and Contingency Plan

The Project will follow protocols outlined in federal regulations (40 CFR Part 112 for oil spill prevention) and relevant state requirements—including NPDES standards for other potential spills during construction. Measures for spill prevention and containment are applied to all hazardous materials used or managed within the Project ROW and associated work areas during the project—this includes activities such as refueling and servicing equipment with diesel, gasoline, lubricants, grease, hydraulic fluids, and other substances. All fuels, lubricants, chemicals, hazardous materials, and associated wastes shall be stored in designated areas and serviced by appropriate vehicles. Whenever possible, these storage locations will be established in upland zones, or at a minimum 500 feet from waterbodies and wetlands, to reduce environmental risk. Additionally, vehicles and equipment will not be refueled within 500 feet of aquatic resources, except for pumps and HDD equipment operating in proximity to those resources. In such cases, specific BMPs, as outlined in the SPCC and CMRP, will be implemented.

6.7 Snow Removal

During winter months, crews will use specialized equipment such as snowplows, graders, and loaders to clear accumulated snow from access roads and work areas. Snow will be removed in a manner that minimizes disturbance to the underlying soil and vegetation—with care taken to avoid creating ruts or compacting thawed ground beneath the snowpack. In environmentally sensitive areas, snow removal methods will be adapted to prevent erosion and protect habitat, and any stockpiled snow will be placed in designated upland locations away from waterbodies and wetlands. Snow removal activities will comply with applicable BLM timing restrictions, safety protocols, and BMPs to ensure continued access while safeguarding natural resources.

6.8 Fire Prevention Plan

Fire watch and control measures implemented during pipeline construction are thorough and preventive, encompassing the use of appropriate equipment, mitigation of site-specific hazards, adherence to emergency response protocols, and strict compliance with relevant regulations. All fire control activities will be conducted in accordance with applicable standards. Designated fire watch personnel will oversee hot-work operations such as welding, cutting, and grinding throughout the construction process. These individuals will be furnished with suitable personal protective equipment (PPE) and will follow established emergency procedures. Fire extinguishers, fire blankets, flame-retardant tarps, and fire boxes will be utilized, as required.

Flammable liquids will be stored and transported in approved containers featuring flame arrestors and overpressure relief devices. As dictated by conditions, hot-work areas will be isolated using fire blankets or barriers to minimize the risk of ignition of adjacent combustible materials. The adoption of these measures is vital to ensure the safety of workers, safeguard the environment, and protect infrastructure during all stages of construction. Please refer to ***Appendix D***, for additional details on the Wildfire Prevention and Suppression Plan.

7 Resource Uses During Construction

This section describes the resource concerns and potential impacts for the Project. The information presented for each resource helps establish the environmental baseline and identify issues relevant to impact analysis. Best Management Practices (BMPs), Required Design Features (RDFs), and other applicable stipulations will be applied as appropriate to avoid, minimize, or mitigate impacts to these resources.

7.1 Constraints and Opportunities

To minimize potential impacts and conflicts, the route-selection process was guided by a combination of environmental, engineering, and land-use considerations. For preliminary route-selection purposes, Bridger categorized areas within the Project study corridor into Exclusion, Avoidance, Constraint, and Preferred/Opportunity areas based on relative suitability for construction and long-term operation of the Project. These categories are internal planning tools used to inform route development and should not be confused with formal BLM ROW allocation designations (e.g., Open, Avoidance, or Exclusion) established under applicable Resource Management Plans (RMPs). Final ROW authorization across federal lands would be subject to BLM land use plan allocations and applicable regulatory review.

Project-level Exclusion Areas represent unique, high valued, complex, or legally protected lands. Construction within these areas could result in substantial environmental impacts, conflicts with existing or planned land uses, or significant hazards to construction and operation. These areas were avoided when possible during route development. Examples of Exclusion Areas include:

- urban areas
- reservations/tribal lands
- national wilderness areas, parks and/or monuments
- protected species critical habitat, grouse lek buffers, where construction is restricted or subject to heightened avoidance measures

Project-level Avoidance Areas include important and valued resources or those assigned special protection status. While development in these areas may not be prohibited, it could result in conflicts with current or planned land uses and present construction challenges or risks. The Project route was designed to minimize crossing or disturbance within these areas. Examples of Avoidance Areas include:

- USFWS grassland easements
- irrigated croplands

- woodlands
- waterfowl production areas
- areas with steep slopes or unstable soils
- opencut and hardrock mines, abandoned mine lands and active mining claims
- crucial wildlife winter range
- rural communities
- properties unevaluated, eligible, or listed on the National Register of Historic Places (NRHP)
- tribal cultural sites and traditional cultural properties (TCPs)
- Lewis and Clark National Historic Trail and Lewis and Clark Special Recreation Management Area (SRMA), including associated Visual Resource Management (VRM) Class II areas

Constraint Areas present some siting sensitivities but overall provide feasible options for Project placement without significant conflicts with existing or planned land uses. These areas generally offer adequate construction access, manageable terrain, and reasonable opportunities for maintenance. Examples of Constraint Areas include:

- prime farmland
- public lands managed by the BLM or USFS
- USFWS wetland easements
- floodplains
- areas with low reclamation potential
- areas with shallow bedrock (difficult excavation conditions)
- adjacent to U.S. or state roadways

Preferred or Opportunity Areas represent lands most suitable for Project development. These typically include previously disturbed or developed corridors where new facilities can be co-located to reduce environmental disturbance and land use conflict. Examples of Preferred and Opportunity Areas include:

- adjacent to existing linear features such as pipelines
- flat or gently rolling terrain
- areas with sufficient reclamation potential
- areas with deep bedrock (soils which can be readily excavated)

7.2 Air Quality

Construction of the pipeline will result in short term, localized emissions primarily associated with fugitive dust from soil disturbance, combustion from construction equipment, and vehicle traffic. These emissions will originate from mobile sources such as non-road diesel equipment and vehicles, and fugitive sources such as particulate matter from unpaved roads and disturbed soils. Fugitive particulate emissions will consist of heavier particles that typically settle within a few hundred yards of the construction zone, limiting impacts to the immediate vicinity of the Project.

The quantity of fugitive dust emissions will depend on soil moisture, texture, and precipitation frequency. Most pipeline construction activities will occur within a given location for approximately 30 days, restricting emissions to a brief period before reclamation begins. Fugitive dust emissions will diminish once construction activities end and disturbed areas are stabilized and revegetated.

Combustion emissions from construction equipment will be minimized because all engines will comply with U.S. Environmental Protection Agency (USEPA) mobile source emission standards (40 CFR 86). Bridger will ensure the use of ultra-low sulfur diesel (ULSD) fuel in accordance with USEPA requirements to reduce sulfur dioxide and particulate emissions.

Mitigation measures for air quality will include:

- Proper maintenance of construction equipment to minimize exhaust emissions.
- Application of water or approved dust suppressants (e.g., magnesium chloride) on disturbed areas near sensitive receptors.
- Minimizing soil disturbance to only areas necessary for construction.
- Compliance with local ordinances on open burning.

A comprehensive air quality emission inventory and analysis will be conducted for construction and operation of the Project. The inventory will quantify emissions of applicable criteria pollutants (NO_x, SO_2, PM_{10}/$PM_{2.5}$, CO, VOCs), hazardous air pollutants (HAPs), and greenhouse gases (CO_2, CH_4, N_2O). The analysis will evaluate short-term construction impacts, long-term operational impacts, and cumulative impacts to air quality. Results will be documented in the NEPA document and used to identify additional mitigation measures to ensure compliance with federal and state air quality standards.

These commitments align with BLM guidance and Clean Air Act requirements and will be coordinated with state permitting authorities.

7.3 Noise

The noise environment is defined by ambient noise levels, existing noise sources, noise sensitive receptors in the vicinity of the project, and local terrain features that may impact noise transmission.

Throughout the duration of construction, Bridger will comply with all applicable local noise ordinances. Construction will normally occur during daytime hours. Nighttime noise levels will normally be unaffected by construction activities. Equipment will be properly maintained to minimize unnecessary noise.

The Project will be constructed predominantly in rural agricultural areas. Day-night average noise levels (Ldn) on the A-weighted scale (dBA) are estimated to range from approximately 40 dBA in rural residential areas to 45 dBA in agricultural cropland (USEPA 1978). Typical background noise arises from roadway traffic, seasonal farm machinery, pets, and various household activities. In areas adjacent to major highways and interstates, ambient noise levels may be higher, ranging from roughly 68 to 80 dBA (USEPA 1978).

7.4 Geology Resources

7.4.1 General Geology

The Project traverses a region characterized by diverse geologic formations that span from the U.S./Canada border through Montana and into Wyoming. The general geology along the route includes Quaternary deposits in river valleys and lowlands, underlain by Tertiary and Mesozoic sedimentary rocks such as sandstones, shales, and limestones. The Project corridor crosses major geologic units. These units include the Paleocene, Cretaceous, and Jurassic formations, which are prevalent in eastern Montana and northern Wyoming. These formations reflect a history of ancient inland seas, fluvial systems, and episodic volcanic activity. The geologic map shows that the route intersects several significant river systems. These river systems include: the Missouri, Yellowstone, and Powder Rivers—which have influenced local sedimentation and erosion patterns. Refer to ***Figure 16: Geology Overview.***

The Project is also located within the Great Plains physiographic province (Fenneman 1928). Federal lands affected by the Project fall within two sections of the Great Plains: The Glaciated Missouri Plateau and the Unglaciated Missouri Plateau. The Project also crosses into the High Plains physiographic region; however, no federal lands would be crossed in this area. Refer to ***Figure 17: Physiographic Regions Overview***. The Missouri Plateau is a dissected plateau characterized by badlands, buttes, mesas, and exhumed mountain ranges. The Project route travels through the Glaciated Missouri Plateau from the U.S./Canada border to near Burns, Montana, where it enters the Unglaciated Missouri Plateau. From there, the route continues into Wyoming, passing just west of the Black Hills, without entering that physiographical section. The glaciated section generally has low relief compared with the unglaciated area—which has a greater variety of landforms (Trimble 1980). The Glaciated Missouri Plateau has elevations ranging from approximately 4,500 feet Above Mean Sea Level (AMSL) in the southeastern portion of the Project area to approximately 2,300 feet AMSL at the Missouri River. The Glaciated Missouri Plateau is covered by glacial deposits, but the boundary between the glaciated and unglaciated sections is difficult to determine due to the gradual thinning of glacial deposits over time.

Erionite is a naturally occurring fibrous mineral often found within these volcanic ash layers and sedimentary formations. Erionite fibers can pose significant health hazards when inhaled. For more information on the health and safety risks of erionite, please refer to ***Section 7.12.1, Erionite.***

7.4.2 Surficial Deposits

Reflecting the region's history of Pleistocene glaciation, in northern and eastern Montana, glacial deposits like till and outwash are present. These materials include unsorted mixtures of clay, silt, sand, gravel, and larger rock fragments left behind by retreating glaciers. Wind-blown sediments (loess and dune sands) occur in upland areas, where aeolian processes have redistributed fine particles across the landscape. Colluvial deposits, composed of soil and rock fragments moved downslope by gravity, are found at the base of hills and slopes throughout the Project area.

In Wyoming, alluvial deposits dominate the valleys of rivers, consisting of sand, silt, clay, and gravel transported and sorted by flowing water. These materials accumulate in floodplains and low-lying areas—reflecting the dynamic processes of erosion and deposition. In upland regions and at the base of slopes, colluvial deposits, composed of unsorted soil and rock fragments moved downslope by gravity, are common. Especially where fine particles have been redistributed by aeolian processes, wind-blown sediments, such as loess, may also be present in some areas.

7.4.3 Tertiary Geology

The tertiary geology along the route is characterized by extensive sedimentary basin deposits formed during the Paleogene and Neogene periods. In Montana, the Project traverses through regions dominated by the Williston Basin—which contain thick sequences of tertiary rocks.

In Wyoming, the Project is located just outside the southeastern boundary of the Powder River Basin, near the Black Hills Monocline and Fanny Peak Monocline. Although the route does not cross the basin proper, its proximity to this hydrocarbon-producing region warrants consideration of potential oil and gas leases and infrastructure during the NEPA process. Refer to ***Figure 18: Sedimentary Basins*** – showing the Project route near, but outside, the southeastern boundary of the Powder River Basin.

In Montana, tertiary strata primarily consist of fluvial sandstones, siltstones, mudstones, and significant volcanic ash beds. These deposits reflect ancient river systems and periodic volcanic activity; with paleosols and lacustrine intervals marking episodes of soil formation and lake development. The tertiary formations in this area, such as the Fort Union formation, are notable for their coal beds and fossil content—indicating lush vegetative environments and dynamic sedimentation during the epoch.

Figure 16: Geology Overview

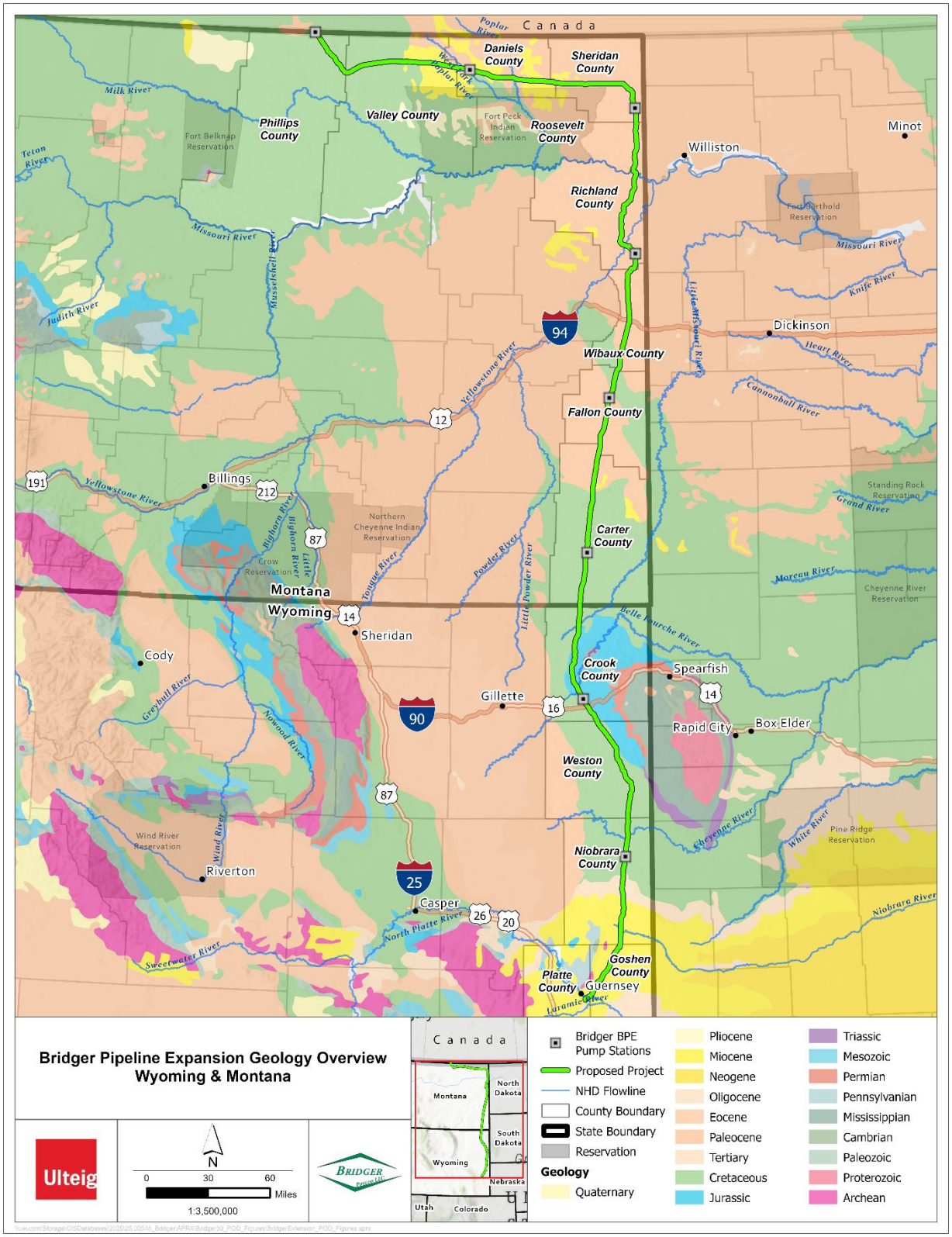


Figure 17: Physiographic Regions Overview

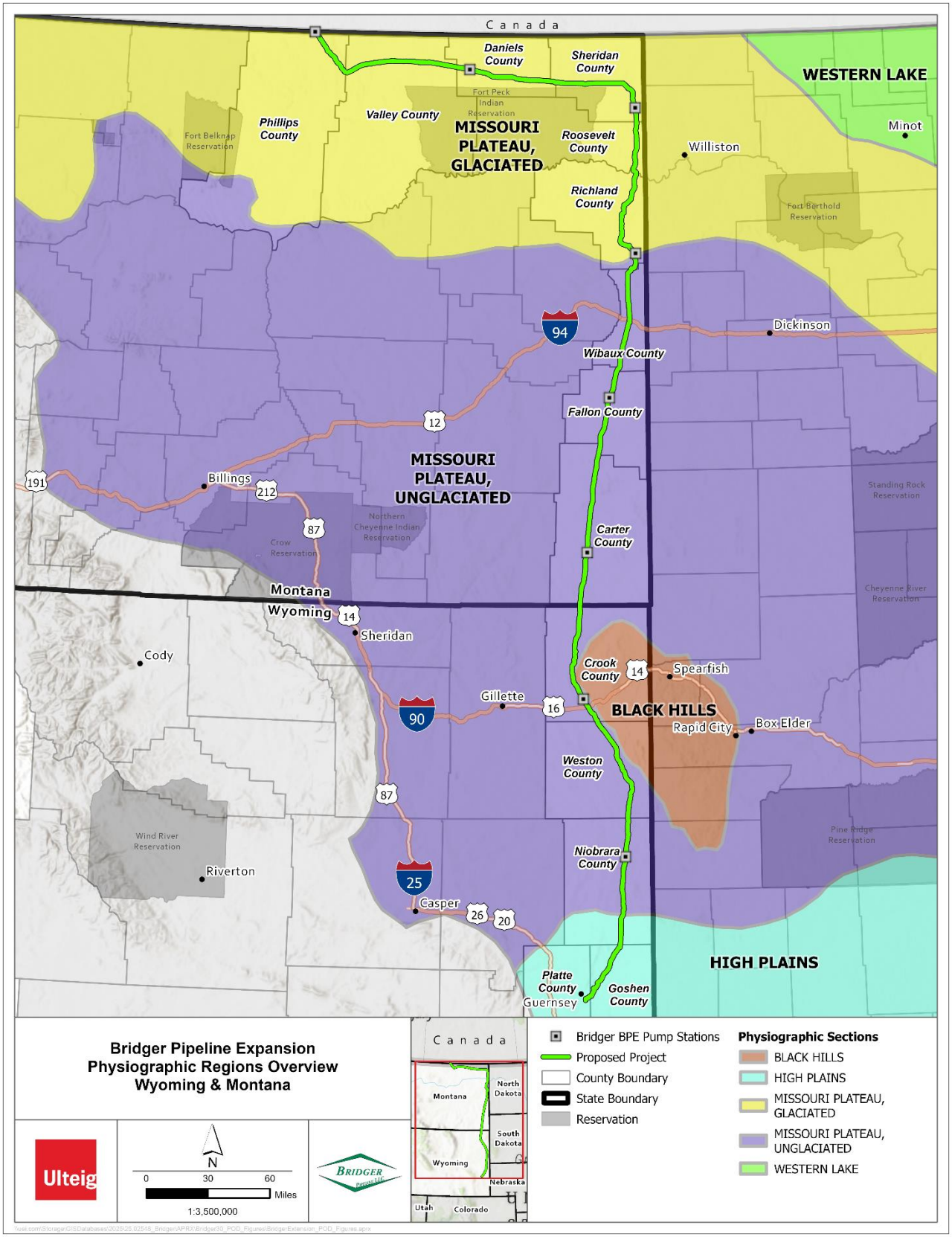
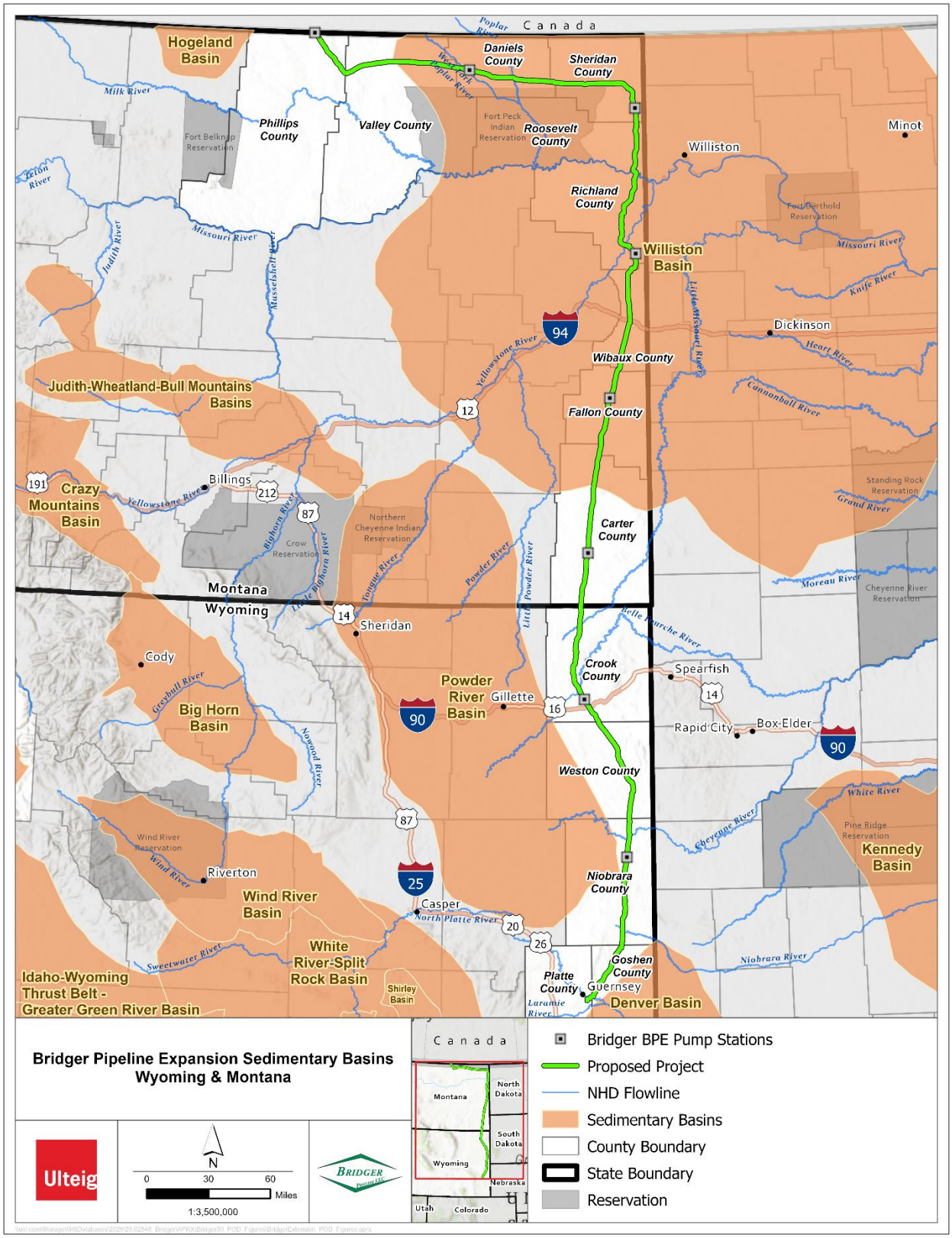


Figure 18: Sedimentary Basins



7.4.4 Solid Mineral Resources

The Project route crosses areas where solid mineral resources may occur in surficial or near-surface deposits, including saleable minerals such as sand, gravel, and shale, and locatable minerals such as bentonite. These materials may be encountered during shallow excavation activities associated with construction, including trenching and temporary workspace development. Any mineral materials encountered during excavation would be left on site, and disturbed areas would be restored to pre-construction conditions in accordance with applicable BLM and USFS requirements.

The Project will identify and evaluate potential conflicts with active mining claims, approved notices, or plans of operation during the NEPA. Where conflicts are identified, Bridger will coordinate with BLM to implement avoidance or mitigation measures and ensure compliance with applicable regulations.

7.4.5 Oil and Gas Resources and Infrastructure

The Project route crosses areas where federal oil and gas leases may be present. Where the proposed alignment deviates from previously disturbed pipeline corridors, Bridger will identify and evaluate potential conflicts with existing oil and gas facilities during the NEPA process. Bridger will coordinate with BLM and other relevant agencies to ensure compliance with applicable lease stipulations and to develop avoidance or mitigation measures as necessary. All existing facilities avoided and not excavating to a depth that would disturb oil and gas resources.

7.4.6 Split Estate Lands

The Project route may cross areas of split estate lands, where private surface ownership is combined with federally reserved mineral rights administered by BLM. These lands have implications for mineral materials (e.g., sand and gravel) and solid minerals (e.g., bentonite) that may occur along the pipeline path. Detailed mapping and resource evaluation will be conducted during the NEPA process to identify potential conflicts and develop appropriate mitigation measures in coordination with BLM and USFS.

7.5 Paleontological Resource

The BLM and USFS use the Potential Fossil Yield Classification (PFYC) system as a predictive modeling tool for evaluating paleontological resource potential based on mapped geologic units. It also assesses potential impacts on fossils from ground-disturbing activities (BLM 2016). Bridger has applied the PFYC system to geologic units within the Project area based on an analysis of existing data (BLM 2022). Refer to ***Table 13: Potential Fossil Yield Classification.***

Table 13: Potential Fossil Yield Classification

Class	Description	Characteristics
1	**Very Low:** Geologic units that are not likely to contain recognizable paleontological resources.	• Geologic units are igneous or metamorphic, excluding air-fall and reworked volcanic ash units. • Geologic Units are Precambrian in age.
2	**Low:** Geologic units that are not likely to contain paleontological resources.	• Field surveys have verified that significant paleontological resources are not present or are very rare. • Units are generally younger than 10,000 years before present. • Recent aeolian deposits. • Sediments exhibit significant physical and chemical changes (i.e., diagenetic alteration) that make fossil preservation unlikely.
3	**Moderate:** Sedimentary geologic units where fossil content varies in significance, abundance, and predictable occurrence.	• Marine in origin with sporadic known occurrences of paleontological resources.

Class	Description	Characteristics
		• Paleontological resources may occur intermittently, but abundance is known to be low. • Units may contain significant paleontological resources, but these occurrences are widely scattered. • The potential for an authorized land use to impact a significant paleontological resource is known to be low-to-moderate.
4	**High:** Geologic units that are known to contain a high occurrence of paleontological resources.	• Significant paleontological resources have been documented, but may vary in occurrence and predictability. • Surface disturbing activities may adversely affect paleontological resources. • Rare or uncommon fossils, including nonvertebrate (such as soft body preservation) or unusual plant fossils, may be present. • Illegal collecting activities may impact some areas.
5	**Very High:** Highly fossiliferous geologic units that consistently and predictably produce significant paleontological resources.	• Significant paleontological resources have been documented and occur consistently. • Paleontological resources are highly susceptible to adverse impacts from surface disturbing activities. • Unit is frequently the focus of illegal collecting activities.
U	**Unknown Potential:** Geologic units that cannot receive an informed PFYC assignment.	• Geological units may exhibit features or preservational conditions that suggest significant paleontological resources could be present, but little information is known. • Geological units represented on a map are based on lithologic character or basis of origin, but have not been studied in detail. • Scientific literature does not exist or does not reveal the nature of paleontological resources. • Reports of paleontological resources are anecdotal or have not been verified. • Area or geologic unit is poorly or under-studied. • BLM staff has not yet been able to assess the nature of the geologic unit.
I	**Ice:** Includes any area that is mapped as ice or snow. Receding glaciers, including exposed lateral and terminal moraines should be considered for their potential to reveal recently exposed paleontological resources. Other considerations include melting snow fields that may contain paleontological resources with possible soft-tissue preservation.	• None
W	**Water:** Includes any surface area that is mapped as water. Most bodies of water do not normally contain paleontological	• None

Class	Description	Characteristics
	resources. However, shorelines should be carefully considered for uncovered or transported paleontological resources. Reservoirs are a special concern because important paleontological resources are often exposed during low water intervals. In karst areas sinkholes and cenotes may trap animals and contain paleontological resources. Dredging river systems may result in the disturbance of sediments that contain paleontological resources.	

Source: BLM 2016.

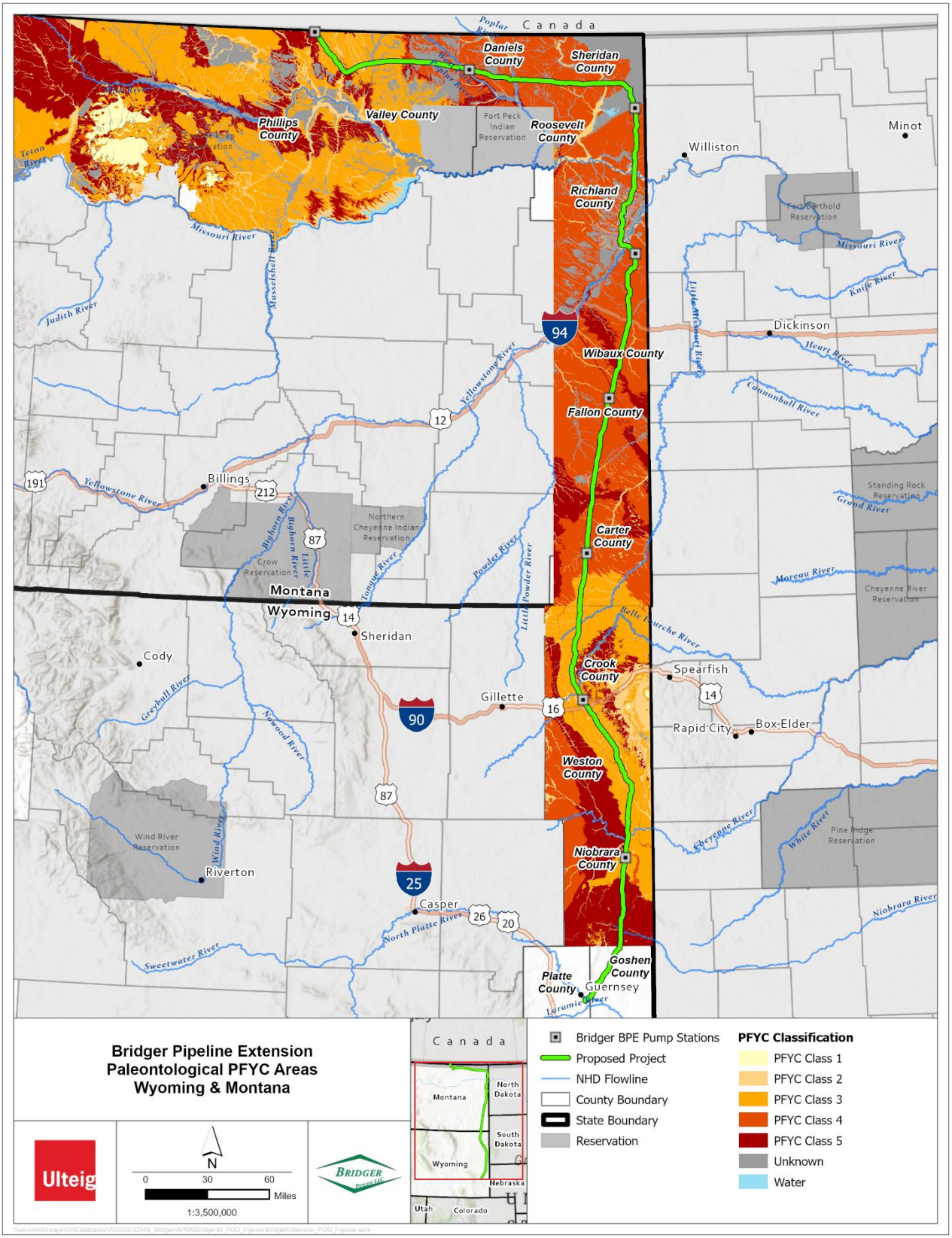
The Lower Miocene and Upper Oligocene undivided units, Arikaree, White River, Hell Creek/Lance, Judith River, Cloverly and Morrison formations are the most sensitive units within the Project area (PFYC Class 5). Some of these formations have yielded scientifically significant remains of numerous dinosaurian taxa, as well as many other fossil vertebrates, invertebrates, and plants. The White River Formation has produced numerous and significant mammalian taxa. Additionally, the Fort Union Formation, underlying a large portion of the route in eastern Montana, historically has a high occurrence of paleontological resources (PFYC Class 4).

Pre-construction paleontological resource surveys will be conducted for areas designated as PFYC classes 3, 4, and 5 with moderate to very high paleontological potential. Within the Malta and Glasgow Field Office boundaries, approximately 17.8 miles of the Project traverse BLM-administered lands classified as PFYC Classes 3, 4, or 5. In addition, approximately 29.9 miles of the Project within the Miles City Field Office boundary and approximately 6.2 miles within the Newcastle Field Office boundary occur in these PFYC classifications on BLM-administered lands. Additionally, about 4.9 miles of the project cross through such PFYC areas on USFS administered lands in the Thunder Basin National Grasslands. Refer to ***Figure 19: PFYC Areas.***

All paleontological resource mitigation, including survey and fossil recovery, will be conducted by qualified professionals holding the appropriate paleontological resources special use permits. Any paleontological resources collected from federal lands will be curated at the repository institutions listed in the corresponding special use permits. An Authorization to Conduct Paleontological Resources Research or Collection (FS-2800-0022B)" will be acquired prior to paleontological resource surveys on USFS administered lands.

Especially in PFYC class 5 areas historically known for abundant fossil occurrences, potential for discovery of additional surface and subsurface fossils during pipeline construction is possible. Bridger will develop a Paleontological Resources Unanticipated Discovery Plan to address any subsurface fossils encountered during construction. Adherence to the UDP, along with pre-construction surveys, will minimize adverse impacts to scientifically significant paleontological resources on federal lands. Any recovered fossils from federal lands will be transferred to an agency-approved paleontological resource repository for curation and permanent storage.

Figure 19: PFYC Areas



7.6 Soil Resources

Soils along the proposed pipeline route are diverse and reflect the range of Major Land Resource Areas (MLRAs) crossed in Montana and Wyoming, including the Brown Glaciated Plains (MLRA 52), Pierre Shale Plains (MLRAs 60A and 60B), Rolling Soft Shale Plain (MLRA 54), Northern Rolling High Plains (MLRAs 58A and 58B), and Black Hills Foot Slopes (MLRA 61). Soils within these MLRAs generally range from loamy to clayey textures and vary from shallow to very deep profiles. Soil temperature regimes range from frigid to mesic, and soil moisture regimes range from ustic to aridic. Most soils within the Project area are well drained; however, localized areas may exhibit moderately well drained to somewhat excessively drained conditions. ***Table 14: Major land Resource Areas*** summarizes MLRA's occurring within the project area on federal lands.

7.6.1 Prime Farmland

Prime farmland soils are defined by the U.S. Department of Agriculture (USDA) as soils possessing the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops (USDA Natural Resource Conservation Service [NRCS] 2025). Several soil associations and series represent prime farmland, and key characteristics including adequate moisture supply, favorable temperatures, acceptable acidity or alkalinity levels, and permeability to water and air. Prime farmland soil does not need to be actively cultivated to fall into this category and can be found on pastureland, forestland, or other land. Soil survey data identified scattered areas of prime farmland along the Project corridor, with the highest densities near the north and south ends of the Project. Refer to: ***Figure 20: Prime Farmland.***

7.6.2 Hydric Soils

Hydric soils form under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper soil layers (USDA NRCS 2025). These soils support the growth and regeneration of hydrophytic vegetation. The project corridor crosses varying levels of hydric soils, with the highest concentrations of mostly hydric and all hydric soils occurring near major rivers and wetland complexes in Montana and Wyoming. Most of the Project crosses areas identified as partially to not hydric, referencing the relatively dry nature of the corridor. Refer to: ***Figure 21: Hydric Soils.*** Due to the scale at which the map was produced, hydric soils are classified into four categories: not hydric (0% hydric), partially hydric (1–50% hydric), mostly hydric (51–95% hydric), and all hydric (100% hydric).

Table 14: Major Land Resource Areas

MLRA	Description	Federal Lands Disturbance (Acres)
Brown Glaciated Plains (52)	The dominant soil orders in this MLRA are Mollisols, Alfisols, and Inceptisols. The soils in the area dominantly have a frigid temperature regime, an ustic moisture regime, and mixed or smectitic mineralogy. They generally are very deep, well drained, and loamy or clayey. (USDA NRCS, 2025)	398.44
Northern Rolling High Plains, Northern Part (58A)	The dominant soil orders in this MLRA are Entisols and Inceptisols. The soils in the area dominantly have a frigid temperature regime, anustic moisture regime, and mixed or smectitic mineralogy. They generally are shallow to very deep, well drained, and clayey or loamy. (USDA NRCS, 2025)	28.47
Northern Rolling High Plains, Southern Part (58B)	The dominant soil orders in this MLRA are Aridisols and Entisols. The soils in the area dominantly have a mesic temperature regime, an aridic moisture regime that borders on ustic, and mixed or smectitic mineralogy. They are shallow to very deep, generally well drained, and loamy or clayey. Mollisols and Alfisols occur in areas that have an ustic soil moisture regime that borders on aridic. (USDA NRCS, 2025)	7.92
Rolling Soft Shale Plain (54)	The dominant soil orders in this MLRA are Mollisols and Entisols. The soils in the area dominantly have a frigid soil temperature regime, an ustic soil moisture regime, and mixed or smectitic mineralogy. They are shallow to very deep, generally somewhat excessively drained to moderately well drained, and loamy or clayey. (USDA NRCS, 2025)	9.07
Pierre Shale Plains (60A)	The dominant soil orders are Entisols, Alfisols, Vertisols, and Inceptisols. Mollisols are of lesser extent. The soils in the area dominantly have a mesic temperature regime, an ustic moisture regime, and smectitic or mixed mineralogy. They are shallow to very deep, generally well drained, and clayey. (USDA NRCS, 2025)	172.51
Pierre Shale Plains, Northern Part (60B)	The dominant soil orders in this MLRA are Alfisols, Entisols, and Vertisols. The soils in the area dominantly have a frigid soil temperature regime, an ustic soil moisture regime, and smectitic mineralogy. They are shallow to very deep, generally well drained, and clayey. (USDA NRCS, 2025)	549.38
Black Hills Foot Slopes (61)	The dominant soil orders in this MLRA are Alfisols, Entisols, and Mollisols. The soils in the area dominantly have a frigid or mesic temperature regime, an aridic or ustic moisture regime, and mixed or smectitic mineralogy. They are shallow to very deep, generally well drained, and loamy. (USDA NRCS, 2025)	4.86

7.6.3 Erosion and Soil Limitations

The Project crosses northeastern Wyoming and eastern Montana and spans multiple BLM Field Office jurisdictions, including Glasgow, Malta, Miles City, Casper, and Newcastle, intersecting a diverse range of soil conditions with varying erosion susceptibility. Collectively, these soil designations highlight the need for location-specific design, construction timing, and erosion control measures to maintain soil stability, prevent sedimentation, and support successful reclamation across the project area. Refer to ***Figure 22: Erosion Susceptibility and Low Reclamation Potential.***

Within the Glasgow, Malta, and Miles City Field Offices, the Project would cross areas of sensitive soils with a high risk of degradation from surface disturbance. Factors for vulnerability to site degradation include relative risk of water and wind erosion, salinization, sodification, organic matter and nutrient depletion and/or redistribution, and loss of adequate rooting depth needed to maintain desired plant communities (USDA NRCS 2026). Surface-disturbing activities in these areas would be allowed with specialized design features and would require an approved reclamation and monitoring plan demonstrating that impacts to soil and water resources would be minimized, soil productivity maintained or restored, and runoff, sedimentation, and erosion adequately controlled. Activities would avoid areas susceptible to mass wasting, badlands, and/or rock outcrops, and would be restricted during wet periods to maintain site stability and support successful reclamation.

In Wyoming, the Casper and Newcastle Field Office areas are characterized using SSURGO erodibility factors ranging from low to relatively higher erosion potential, reflecting a mosaic of soil stability conditions along the project corridor.

The Project was routed with consideration for the location of sensitive soils to avoid or minimize potential impacts where practicable. Bridger will continue to refine the project alignment as design progresses, and coordination with BLM will occur to assist in siting decisions and the avoidance of significant soil-related issues. The final pipeline route will comply with applicable RMPs, and reclamation plans will be developed, submitted, and approved by the appropriate offices prior to construction.

7.6.4 Soil Drainage

Soil drainage characteristics obtained from the SSURGO database refer to natural soil saturation and are classified into seven USDA categories: excessively drained, somewhat excessively drained, well drained, moderately well drained, somewhat poorly drained, poorly drained, and very poorly drained (USDA NRCS 2025). Soil survey data shows that most soils along the Project route are well drained. Refer to: ***Figure 23: Drainage Classification.***

Figure 20: Prime Farmland

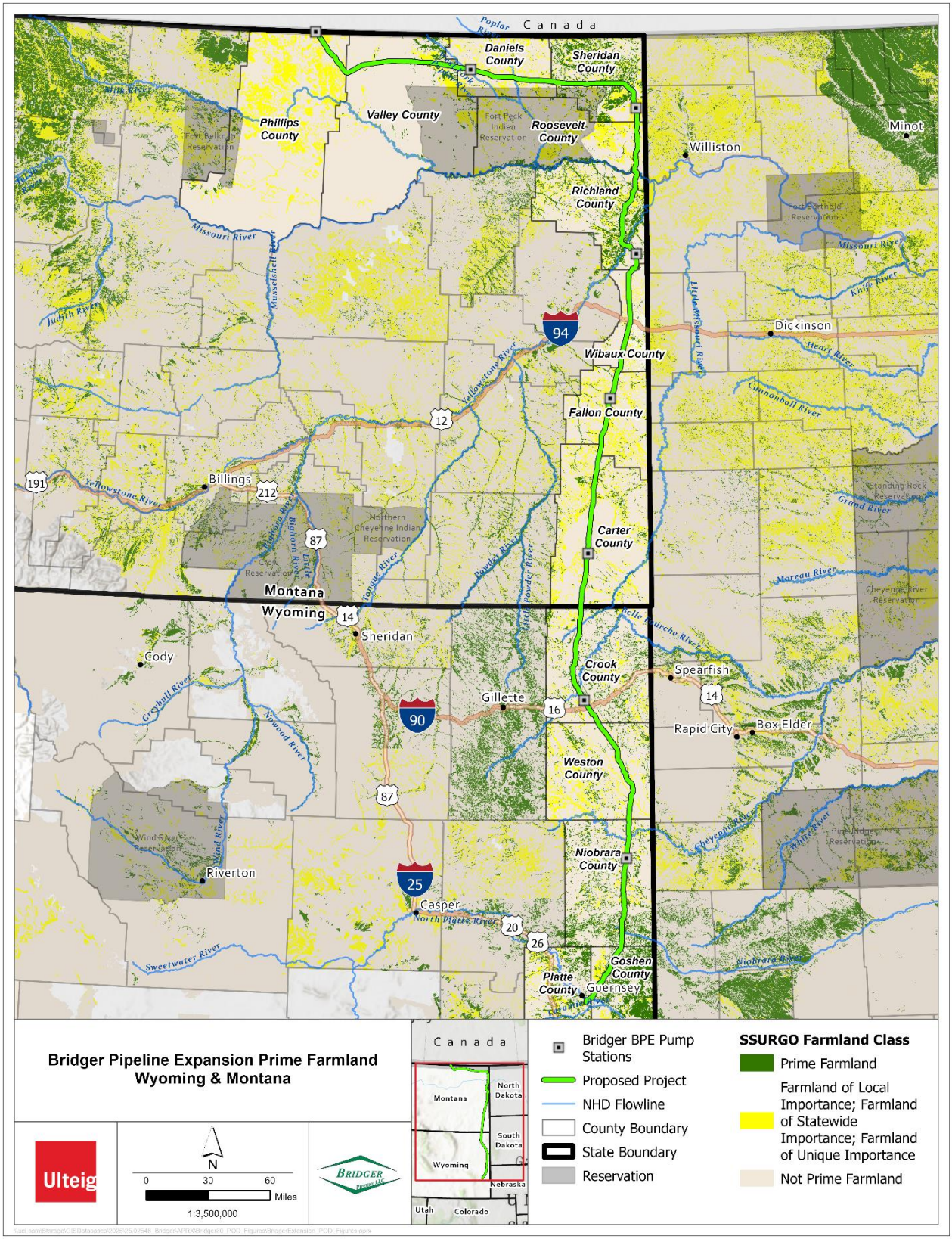


Figure 21: Hydric Soils

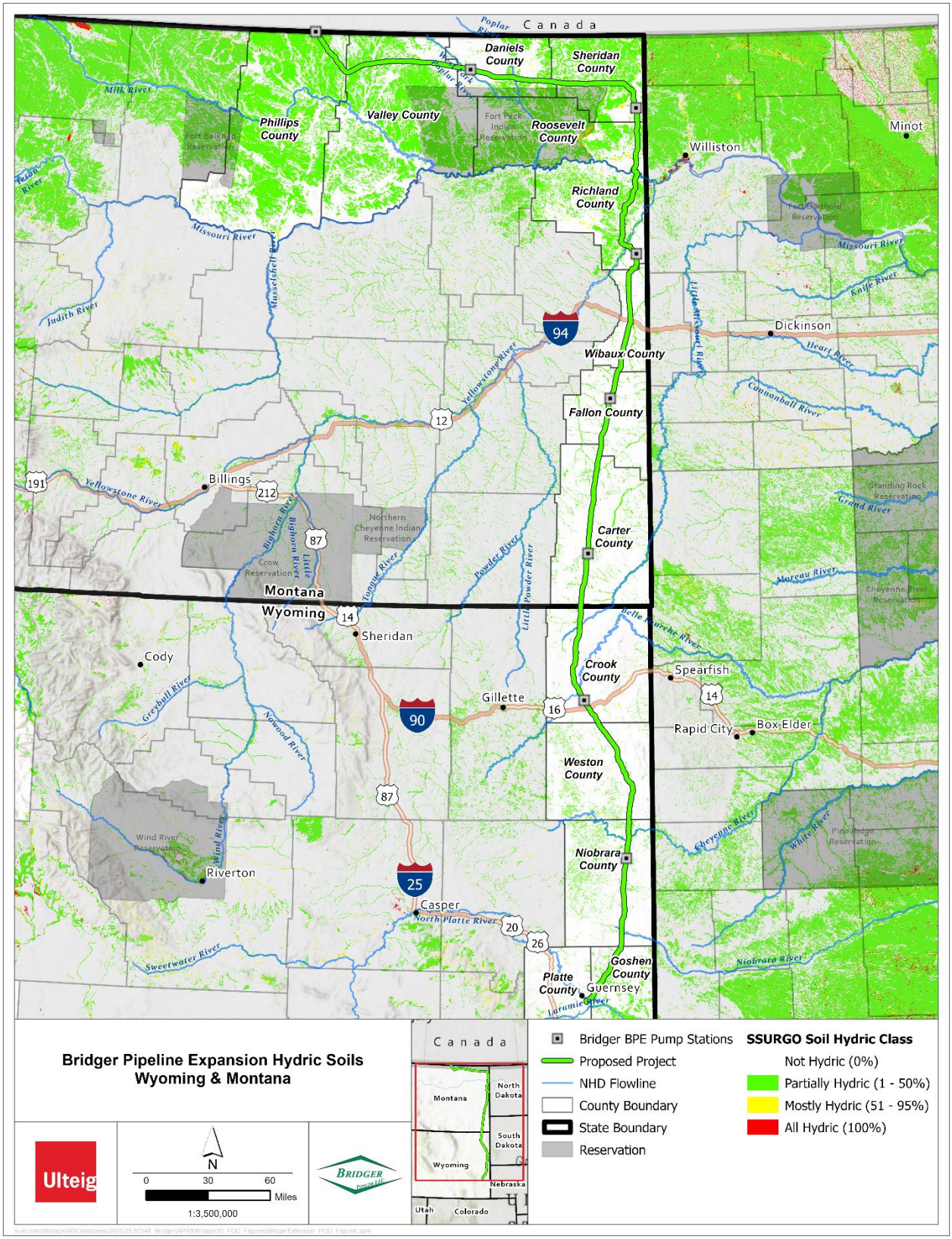


Figure 22: Erosion Susceptibility and Low Reclamation Potential

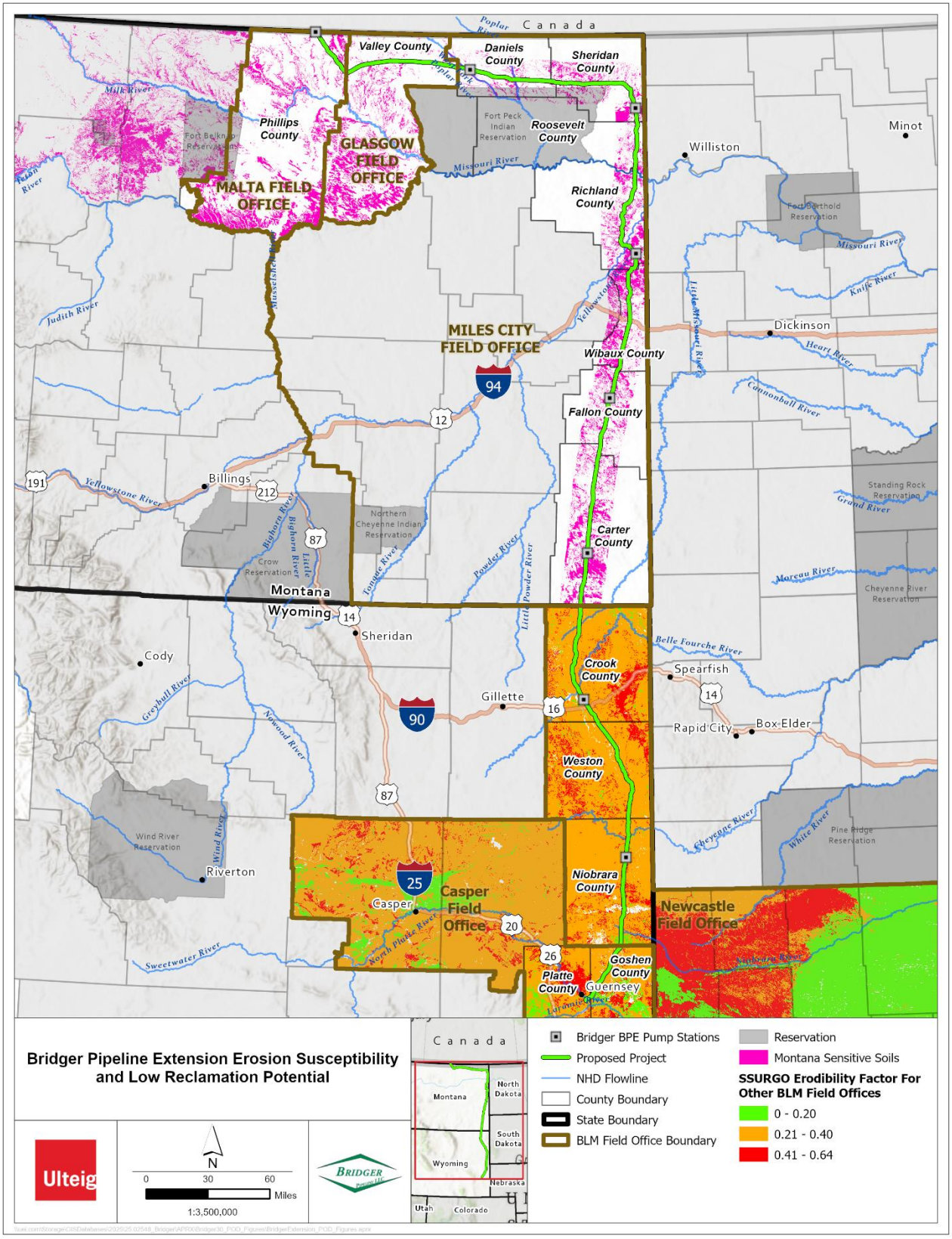
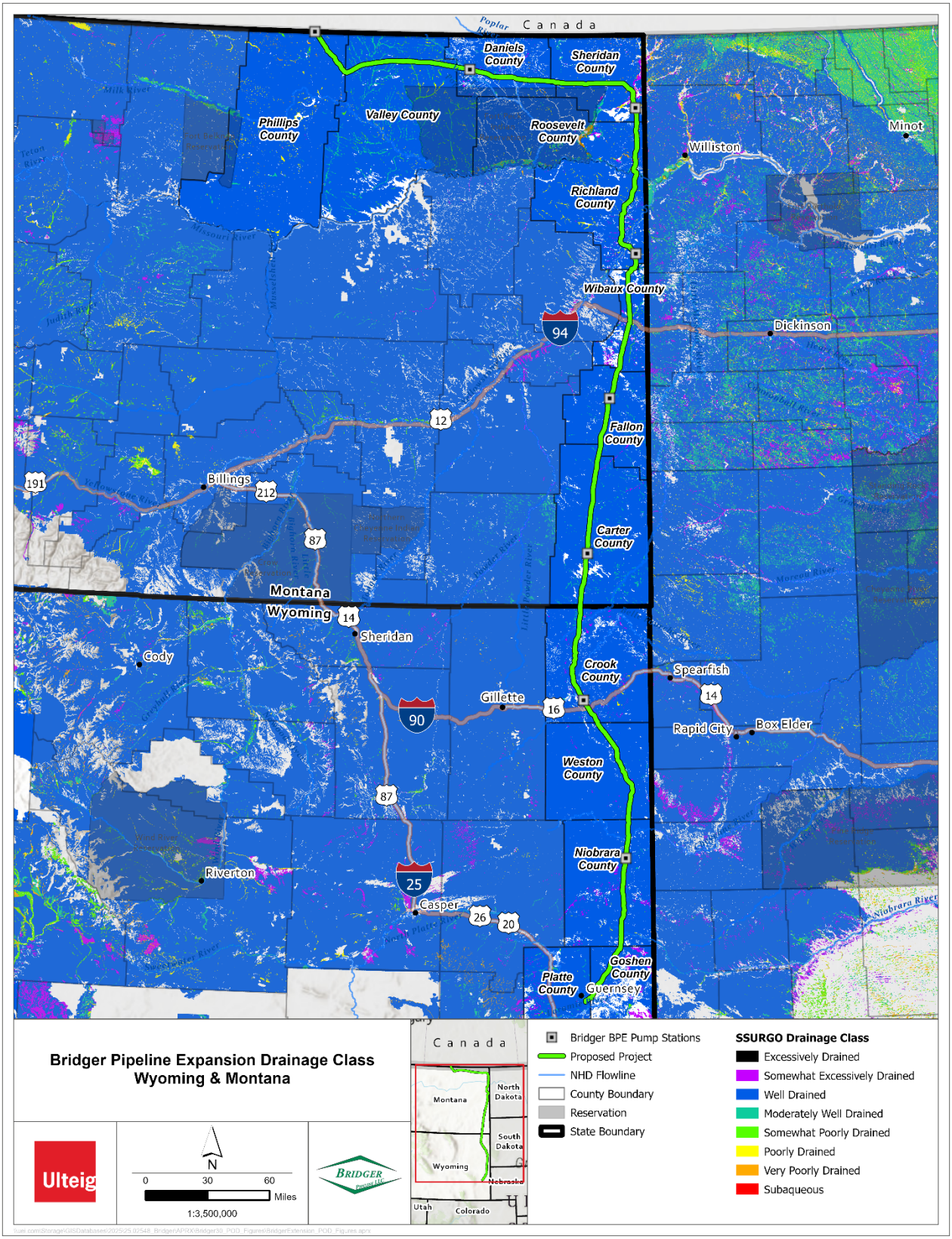


Figure 23: Drainage Classification



7.6.5 Soil Compaction and Rutting

Heavy construction equipment may cause compaction and/or rutting particularly in moist, fine-textured soils. Mitigation measures, such as restricting equipment movement under wet conditions and limiting repeated passes or matting, will be employed to reduce compaction. Stockpiling topsoil separately and implementing soil conservation standards will further preserve soil structure and productivity.

The CMRP will elaborate on these measures in greater detail, however examples of minimization measures to be implemented include the following soil conservation practices:

- On cultivated or improved lands, topsoil shall be removed over areas to be graded or excavated. Topsoil shall be removed to its actual depth or a maximum of 12 inches and stored separately from spoil banks. Under no circumstances shall topsoil be used for trench backfill or padding. Only approved equipment will be used for stripping and replacing topsoil.
- Where grade cuts produce additional spoil, it may be stored on either side of the work area. Topsoil must be stripped from the entire workspace so that subsoil is not stored on topsoil.
- Topsoil shall not be piled in a manner that increases its water content. Storage piles must not block drains or ditches.
- Unless topsoil has been stripped from the work location, all work must stop when soils are wet enough to form ruts greater than 4 inches deep.
- These soil conservation requirements apply to all construction activities requiring excavation.

7.7 Water Resources

7.7.1 Surface Water

Surface water resources within the Project area support a range of ecological, agricultural, and recreational uses, and they are an important consideration in the Project's environmental analysis. Hydrological units crossed by the Project route are shown in ***Figure 24: Montana Hydrologic Unit Areas*** and ***Figure 25: Wyoming Hydrologic Unit Areas***.

Construction and operation of the Project have the potential to temporarily or permanently affect surface water resources on public lands.

Potential impacts from Project construction may include:

- Temporary water quality degradation from increases in suspended solids concentrations during in-stream construction activities.
- Increased sedimentation in streams resulting from runoff associated with in-stream construction.
- Channel and bank modifications that may affect channel morphology and stability.
- Reduced stream flows in locations where water is withdrawn for hydrostatic testing.

Other potential construction-related impacts include water quality degradation from accidental spilling of hazardous materials. These materials include diesel fuel, gasoline, lubricating oils, grease, hydraulic and other fluids.

Figure 24: Montana Hydrologic Unit Areas

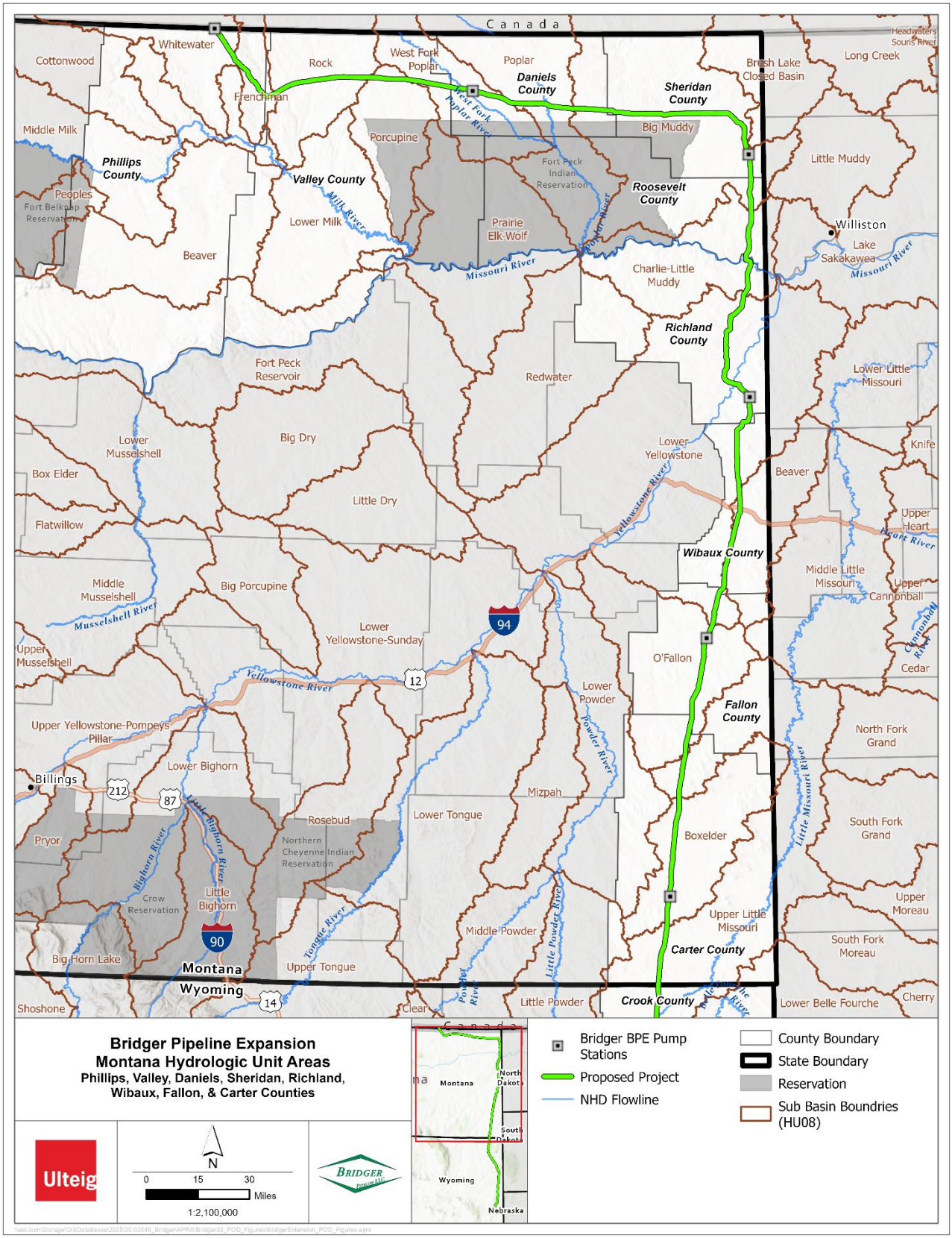
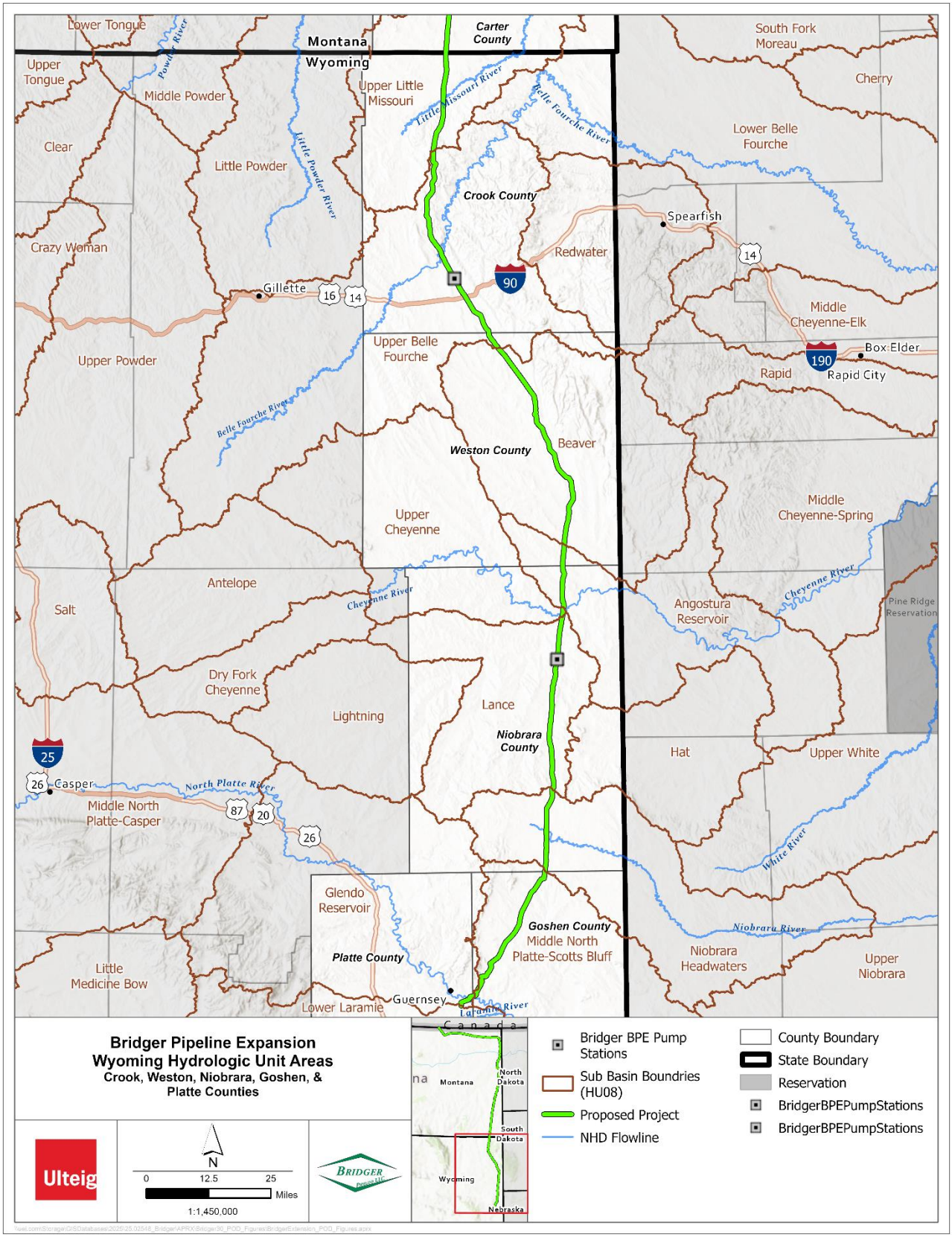


Figure 25: Wyoming Hydrologic Unit Areas



7.7.1.1 Aquatic Resources

According to the U.S. Geological Survey (USGS) National Hydrography Dataset (NHD), the Project route passes over 151 features on federal lands. These include both natural streams and rivers, as well as man-made elements like canals and other constructed waterways. Details of these crossings are available in ***Table 15: USGS NHD Crossings on Federal Lands.*** The Project also intersects 96 features documented by the USFWS National Wetland Inventory (NWI), such as lakes, ponds, and seasonal or temporary areas. Information regarding these crossings can be found in ***Table 16: USFWS NWI Crossings on Federal Lands.*** It is important to note that both the USGS NHD and the USFWS NWI identify potential aquatic resources predominantly through desktop methods. Bridger will conduct comprehensive field surveys to validate/delineate aquatic resources within the Project corridor. While these datasets are distinct, areas of overlap may slightly elevate the numbers presented in the tables below.

Table 15: USGS NHD Crossings on Federal Lands

Location	Stream/Rivers	Created Features	Total
BLM	124	3	**127**
USFS	23	1	**24**
Total	**147**	**4**	**151**

Most of the stream crossings are low-gradient streams and ephemeral drainages that convey flow only during snowmelt or precipitation events. Perennial streams are less common and generally occur in the lower elevations or near major river systems. Many of the ephemeral and intermittent channels are expected to be dry during the construction period; however, appropriate precautions will be implemented to protect water quality and aquatic habitat in all cases.

The Missouri River will be crossed approximately 1.8 miles southeast of Lakeside, Montana where the river is approximately 1,000 feet wide. The land on both sides of the river is privately owned. The Yellowstone River will be crossed approximately 2.8 miles south of Crane, Montana where the river is approximately 1,100 feet wide. The land on both sides of the river is privately owned. Both rivers represent major crossings along the Project route and are included here for context.

Table 16: USFWS NWI Crossings on Federal Lands

Location	NWI Crossings			Total
	Freshwater Emergent	Freshwater Pond	Riverine	
BLM	13	4	62	**79**
USFS	0	1	16	**17**
Total	**13**	**5**	**78**	**96**

Most USFWS NWI crossings on federal lands along the Project route are riverine features, reflecting the prevalence of streams and rivers in both Montana and Wyoming. Scattered throughout the corridor, freshwater emergent wetlands and ponds also occur, with emergent wetlands primarily found in Montana and ponds present in both states. Like USGS NHD feature impacts discussed above, most of the riverine features are expected to be dry during construction—appropriate precautions will be implemented to protect water quality and aquatic habitat in all cases.

Bridger will conduct aquatic resource delineations along the pipeline ROW in accordance with federal guidelines and agency requirements. These surveys will identify and map the boundaries of wetlands, and other aquatic resources, using established protocols to ensure accurate classification and documentation. Once aquatic resources are delineated, Bridger will prioritize avoidance by designing the pipeline route to bypass these areas wherever feasible.

As part of the NEPA process, Bridger has prepared a CMRP that specifies strategies for avoiding, reducing, and mitigating impacts related to construction. Please refer to ***Appendix C***. Examples of minimization measures to be implemented include the following:

- Developing and adhering to a Spill Prevention, Control, and Countermeasure (SPCC) Plan.
- Maintaining erosion and sediment control structures until vegetation is successfully reestablished.
- Conducting regular inspections of stream crossings and drainage features to ensure proper function.
- Avoiding refueling or equipment maintenance activities within 500 feet around surface waters.
- Implementing rapid response and cleanup procedures in the event of a release or spill.

All construction activities, at or near waterbodies, will comply with applicable federal, state, and local regulations, including Section 404 of the CWA, and will be conducted under USACE Nationwide or Individual Permits, as required. Construction at stream crossings will adhere to seasonal restrictions established by resource agencies to protect spawning or migratory periods for aquatic species. Additionally, Bridger will develop/implement mitigation measures in coordination with regulatory agencies—such as restoring or enhancing wetland functions at impacted sites or providing compensatory mitigation at approved offsite locations, if necessary.

7.7.1.2 Water Quality

The CWA, Section 303(c) requires each state to review, establish, and periodically revise water quality standards for surface waters within its jurisdiction. These standards are designed to protect designated beneficial uses, which may include aquatic life, recreation, public water supply and agriculture or industrial uses. Each state developed a beneficial-use classification system that identifies the intended use of specific waterbodies and sets corresponding water quality criteria.

Regulatory programs that implement these standards include default narrative criteria, non-degradation provisions, and a Total Maximum Daily Load (TMDL) process for waters listed as impaired under Section 303(d) of the CWA. Total Maximum Daily Loads establish the maximum amount of a pollutant that a waterbody can receive while still meeting applicable water quality standards. Refer to: ***Table 17: Impaired Water Categories*** for expanded information. It is important to note that both Montana and Wyoming include subcategories for Categories 3, 4, and 5. The subcategories provide additional information, but do not significantly alter the description.

According to USEPA 303(d) lists, 16 riverine features crossed by the Project in Montana are listed as impaired (Category 4 or higher). Impairments are generally attributed to elevated sedimentation, nutrients, or other pollutants associated with land disturbance and runoff. No impaired waters are crossed in Wyoming.

The Project is planned to minimize impacts to the Missouri River by utilizing HDD, implementing a SWPPP and SPCC plan, and installing comprehensive leak detection systems. No impacts or additional water quality degradation along the Missouri River are expected from project construction or operation. Refer to: ***Table 18: Impaired Water Crossings***.

In addition to state water quality classifications and impaired waters listings, the Project was reviewed for potential intersections with designated Source Water Protection Areas (SWPAs), including municipal wellhead protection zones and surface-water source protection areas. Based on available state and local source-water protection maps in Montana and Wyoming, no SWPAs are crossed or directly impacted by the Project, and no source water will be used.

Table 17: Impaired Water Categories

Category	Description
1	All designated uses are supported
2	Some uses are supported, others not assessed
3	Insufficient data
4	Impaired, but TMDL not required
5	Impaired, TMDL required

Table 18: Impaired Water Crossings

Resource Name	Location (PLSS)	Federal Lands Adjacent	Impairment Category	Crossing Method
Frenchman Creek	Sec. 12, T34N, R34E	N	4	HDD
Poplar River	Sec. 15, T34N, R48E	N	5	HDD
Big Muddy Creek	Sec. 27, T34N, R55E	N	5	HDD
Missouri River	Sec. 31, T27N, R59E	Y	5	HDD
Fourmile Creek	Sec. 7, T25N, R59E	N	5	HDD
First Hay Creek	Sec. 23, T24N, R58E	N	5	HDD
Lone Tree Creek	Sec. 29, T23N, R58E	N	5	HDD
North Fork Fox Creek	Sec. 20, T22N, R58E	N	5	HDD
Fox Creek	Sec. 29, T22N, R58E	N	5	HDD
Crane Creek	Sec. 8, T21N, R58E	N	5	HDD
Sears Creek	Sec. 33, T21N, R58E	N	5	HDD
Yellowstone River	Sec. 34, T21N, R58E Sec. 1, T20N, R58E	N	5	HDD
Smith Creek	Sec. 34, T19N, R59E	N	4	HDD
Cabin Creek	Sec. 35, T10N, R58E	N	5	HDD
Pennel Creek	Sec. 1, T8N, R58E	N	5	HDD
Sandstone Creek	Sec. 27, T8N, R58E	N	5	HDD

7.7.2 Groundwater

The Project traverses a range of groundwater resources in both Montana and Wyoming, each characterized by distinct geologic formations and hydrogeologic properties. In Montana, the Project crosses the upper and lower Cretaceous aquifers as well as the lower Tertiary aquifers, while in Wyoming, the route extends across the same upper and lower Cretaceous aquifers and lower Tertiary aquifers, but also intersects the Paleozoic aquifer (USGS, Ground Water Atlas of the United States). Locations of aquifers crossed by the Project are shown in ***Figure 26: Montana Aquifers*** and ***Figure 27: Wyoming Aquifers***.

The upper and lower Cretaceous aquifers are composed of sedimentary rocks deposited during the Cretaceous period, which lasted from approximately 145 to 66 million years ago (USGS, 2005). These aquifers typically consist of sandstones, shales, and siltstones, with the sandstones serving as the primary water-bearing units. The upper Cretaceous aquifers, such as the Fox Hills and Lance formations, often yield moderate to high quantities of water and are widely utilized for agricultural, municipal, and industrial purposes (USGS, Ground Water Atlas). The lower Cretaceous aquifers, including formations like the Kootenai and Inyan Kara, are situated beneath the upper units and contain substantial groundwater reserves. These lower aquifers may be more confined and less accessible in certain regions due to the presence of thick shale layers that act as confining units (USGS, 2005).

The lower Tertiary aquifers consist of sedimentary deposits formed during the early part of the Tertiary period, roughly 66 to 34 million years ago (WSGS, 2022). These aquifers are generally composed of sandstones, conglomerates, and occasional coal beds, which can store and transmit groundwater efficiently. The Wasatch and Fort Union formations are notable examples of lower Tertiary aquifers in the region. These aquifers are important sources of water for rural communities and agricultural operations—particularly in areas where more recent or shallower aquifers are limited or depleted (USGS, Ground Water Atlas).

In Wyoming, the Project intersects the Paleozoic aquifer, which is comprised of sedimentary rocks from the Paleozoic era, dating back approximately 541 to 252 million years ago (USGS, Ground Water Atlas). Paleozoic aquifers typically include limestones, dolomites, and sandstones, such as the Madison and Tensleep formations. These rocks can be highly productive water-bearing formations, especially near recharge areas along basin margins. In some locations these aquifers are deeply buried and artesian, providing pressurized groundwater flows to wells drilled into them. Water quality in Paleozoic aquifers can vary, with some zones containing mineralized or saline water, while others yield fresh groundwater suitable for various uses (USGS, 1986).

Construction of the Project may pose potential impacts to groundwater resources, particularly in regions with sensitive aquifers and shallow water tables. Specifically, accidental spills or leaks of crude oil may introduce hydrocarbons and other contaminants into the shallow aquifers. These contaminants may migrate through permeable soils, potentially reaching groundwater supplies and affecting water quality for a variety of uses and users.

Disturbance of soils during trenching and excavation may also alter natural groundwater flow patterns. Removal of vegetation and compaction of soils may reduce infiltration rates and increase surface runoff, which can decrease groundwater recharge in affected areas.

As part of the NEPA process, Bridger will identify and address resource concerns and develop a comprehensive CMRP to guide BMPs, minimize adverse effects, and ensure restoration of disturbed areas. The CMRP will elaborate on these measures in greater detail, however examples of minimization measures to be implemented include the following:

- Developing and adhering to a SPCC plan.
- Maintaining erosion and sediment control structures until vegetation is successfully reestablished.
- Conducting regular inspections of stream crossings and drainage features to ensure proper function.
- Avoiding refueling or equipment maintenance activities within designated buffer zones around surface waters.
- Implementing rapid response and cleanup procedures in the event of a release or spill.

Figure 26: Montana Aquifers

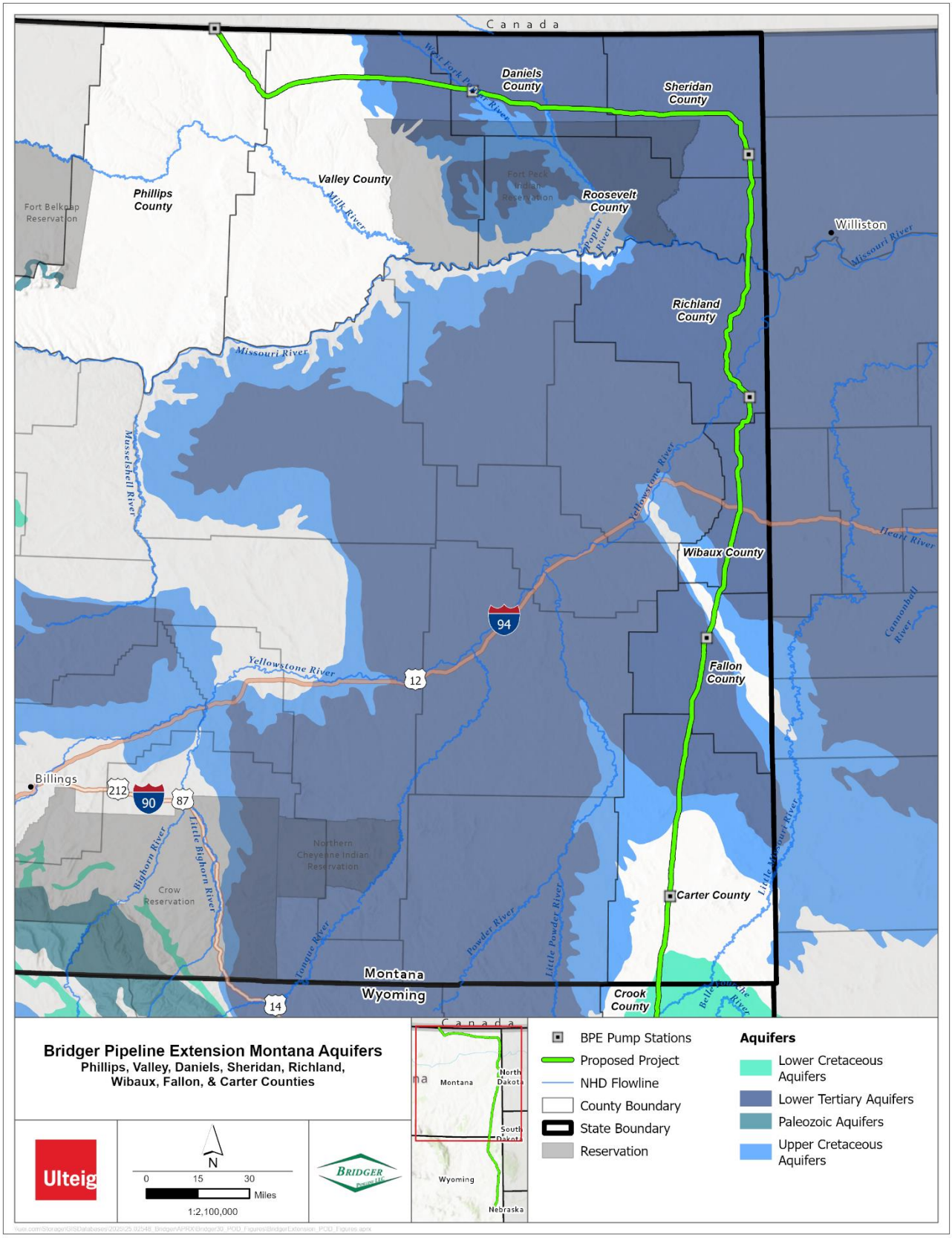
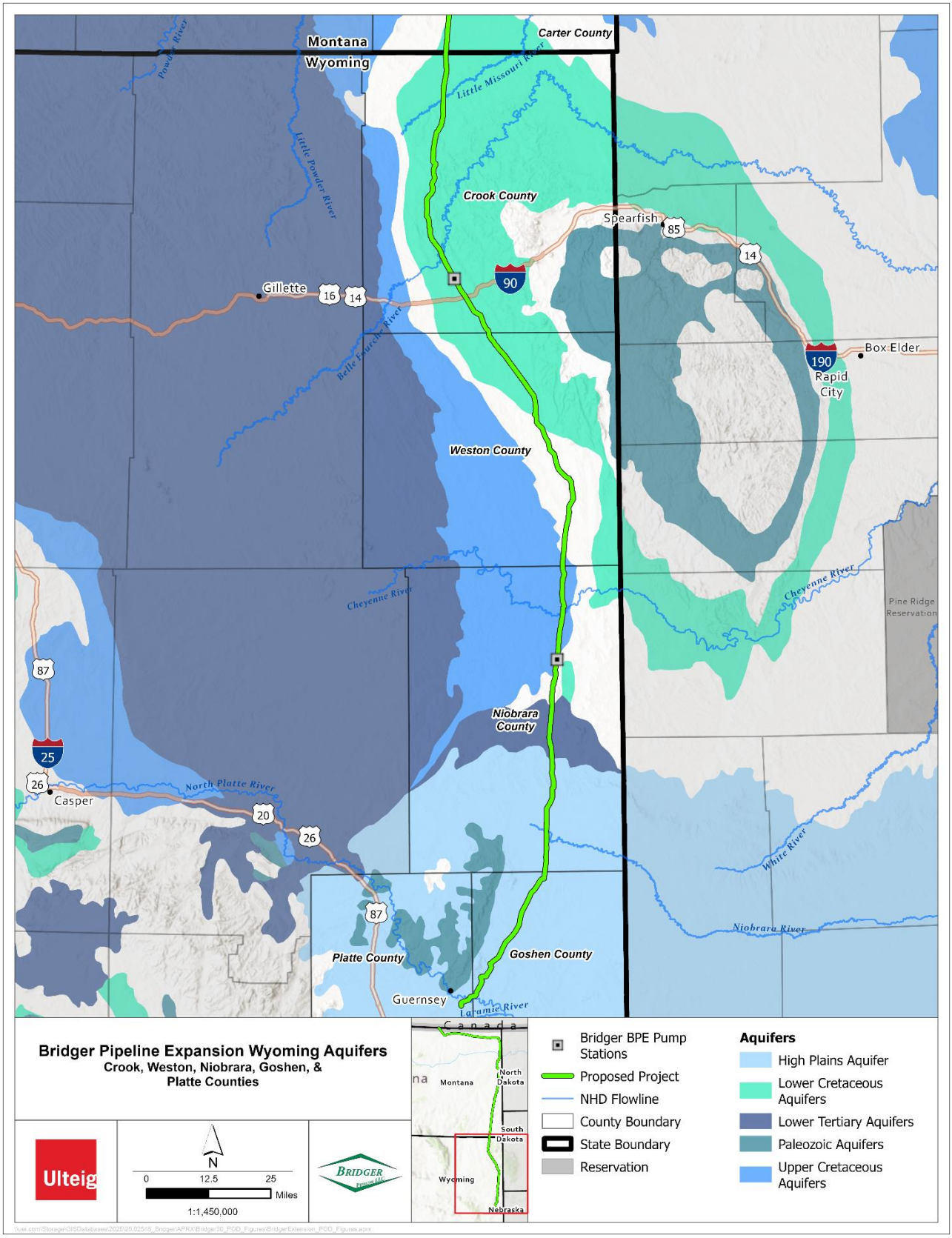


Figure 27: Wyoming Aquifers



7.7.2.1 Water Supplies and Wells

The Project route crosses, or is adjacent to, private areas where municipal or agricultural water supply wells may exist. Although specific well locations on federal lands are not available for this assessment, the potential exists for groundwater wells to be affected by construction or operational activities, particularly in areas with shallow groundwater or near surface water bodies.

Potential impacts to water supplies and wells could include:

- Temporary turbidity or sedimentation in shallow aquifers caused by surface runoff or soil disturbance.
- Accidental spills or leaks of petroleum products, lubricants, or other hazardous materials that could infiltrate groundwater.
- Temporary disruption of access to wells or surface water intakes during construction activities.

To minimize potential impacts, the following general measures will be implemented:

- Project personnel will identify wells during pre-construction surveys in accordance with applicable state and local requirements.
- Construction near identified water supply wells will incorporate protective setbacks, containment measures, and erosion control.
- Spill prevention, control, and response procedures will be implemented in all areas where hazardous materials are handled.
- Any water supply disruption will be mitigated promptly, and alternative water sources will be provided if necessary.

Project impacts to wells and water supplies on federal lands are not anticipated. The Project would implement standard construction and operational BMPs and emergency response procedures and comply with all regulatory requirements.

7.7.3 Floodplains

Floodplains are relatively low, flat areas of land adjacent to waterbodies that temporarily store overflow water during flooding events. Floodplains are often associated with rivers and streams, where stream-deposited sediments form terraces at varying elevations along the water course.

Executive Order 11988 (Floodplain Management) directs federal agencies to avoid, to the extent practicable, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains. Agencies are required to provide leadership and take action to reduce flood risk, minimize impact on human safety, health, and welfare, and to restore/preserve the natural and beneficial values served by floodplains. These responsibilities apply to the acquisition, management, and disposal of federal lands and facilities; federally undertaken, financed, or assisted construction; and federal activities affecting land use—including water and land resource planning, regulation, and licensing.

The Project route traverses multiple floodplains, requiring coordination with local, state, and federal agencies to ensure compliance with floodplain management. The permit process begins with the identification of regulated floodplain areas using Federal Emergency Management Agency (FEMA) flood maps and county resources. In Richland County, Montana the project crosses 11 FEMA Special Flood Hazard Areas (SFHA) and in Goshen County, Wyoming the project crosses 21 FEMA SFHAs. No floodplain SFHAs are crossed in the remaining counties.

Bridger will submit a floodplain permit application to the Richland County Floodplain Administrator. The application will include engineering plans, construction details, and documentation demonstrating compliance with local floodplain regulations. Richland County may require further engineering analyses, such as hydraulic modeling, "no-rise" certifications, and/or scour analysis. Due to the number of floodplain crossings and complexity of the Project, Richland County may require public notice and comment periods. Following the permit process, the county issues a floodplain development permit with specific conditions for construction, erosion control, and restoration.

In Goshen County, Wyoming, the permitting process similarly involves coordination with the county planning department, state agencies, and federal entities. Bridger will meet with the Goshen County Planning Department to discuss the project and submit all required permit applications, including documentation of the proposed route and road use plans. The county reviews these materials and may require roadway improvements to meet local standards. As part of the application, Bridger will demonstrate that the crossing will not increase flood risks or obstruct flood flows, supported by engineering analyses and certifications. Upon approval, Goshen County issues permits with conditions for construction and restoration, and inspections may be conducted to verify compliance.

Construction activities within floodplains may temporarily disturb soils, vegetation, and natural surface hydrology. Potential impacts include localized erosion, sedimentation of waterbodies, and short-term alteration of floodplain function. To minimize these effects, the Project will:

- Avoid floodplain areas where practicable through route selection and micro-siting.
- Limit equipment access and soil disturbance within floodplains to the minimum area necessary for construction.
- Implement erosion and sediment control measures, such as silt fences, check dams, and sediment traps, at all floodplain crossings.
- Restore disturbed floodplain areas promptly following construction, including regrading, reseeding with native vegetation, and stabilization of streambanks.
- Comply with all applicable federal, state, and local permits, including Section 404 of the CWA and other floodplain management requirements.

With these measures, potential impacts to floodplain function and integrity during construction are expected to be temporary, localized, and minor in magnitude.

7.8 Vegetation Resources

7.8.1 General Vegetation Types

Vegetation types, on federal lands along the Project route will be identified and delineated based on review of available literature, online database resources, interpretation of aerial photography, and field surveys.

The Project route includes grassland, cropland, shrubland, forest, water/wetlands, developed areas, and barren land, according to data from the USGS National Land Cover Database (NLCD). Refer to ***Table 19: Land Use.***

Table 19: Land Use

Land Use	Approximate Acres in Construction Corridor	Percent of Overall Route
Grassland/Pasture	8,563	72.8
Cropland	1,980	16.8
Shrubland	882	7.5
Forest	127	1.1
Water/Wetland	124	1.1
Developed	74	0.6
Barren	10	0.1
Total	**11,760**	**100**

Pipeline construction will temporarily alter within the construction ROW through vegetation clearing, trench excavation, soil stockpiling, and increased surface traffic. Reclamation, revegetation, and monitoring will be implemented for all disturbed areas within the construction ROW following completion of construction activities and in accordance with applicable federal permit requirements and agency-approved plans. Vegetation recovery rates are influenced by site-specific factors such as soil preparation and quality, timing of seed application, and precipitation. Short-term reclamation objectives will focus on achieving site stability, erosion control, establishment of native or approved seed mixes, and work toward recovery of pre-disturbance vegetation structure for all vegetation types. Reclamation monitoring will continue until reclamation success criteria and objectives are met.

Bridger will monitor revegetation success along the ROW in accordance with federal permit requirements and agency-approved plans. On BLM-administered lands, reclamation success will be evaluated based on achievement of site stability and establishment of native vegetation consistent with surrounding reference conditions and land use objectives. On USFS-managed lands, revegetation success criteria will be developed in coordination with applicable National Forest(s) and will be based on forest plan direction, site-specific reference conditions, or other agency-approved technical standards.

Grassland, rangeland, agricultural, and previously disturbed vegetation communities are expected to recover toward pre-construction conditions within established monitoring timeframes, typically taking place over a course of three to five growing seasons but can extend beyond five years if reclamation objectives are not met. Sagebrush-dominated communities will also be restored and monitored; however, reclamation success will likely occur on a longer timeframe due to the relative challenge of reestablishing woody vegetation If desirable plant species are not successfully established within the ROW, potential adverse impacts may include increased erosion, introduction or spread of noxious/invasive plant species, and reduced forage production.

7.8.2 Sensitive, Rare, Threatened, and Endangered Plant Species

Certain plant species occurring along the Project route are afforded additional protection by federal and state law, regulation, or policy. This category includes species listed as endangered or threatened under the federal ESA, as well as species identified by BLM, USFS, and the states of Montana and Wyoming as species of concern (SOC).

7.8.2.1 Federally Protected Species

A list of Federally protected plant species was obtained from the USFWS Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) website on October 17, 2025, and applies to a 200-foot corridor along the Project centerline. Known or potentially occurring species along the Project route include Ute ladies'-tresses (ULT) (*Spiranthes diluvialis*) and western prairie fringed orchid (*Platanthera praeclara*). Both species are identified as federally threatened and were only identified along the Wyoming portion of the Project. No federally protected plant species were identified along the Project corridor in Montana.

A threatened plant species, as defined by the USFWS, is one likely to become endangered in the foreseeable future—across all or a significant portion of its range. While these species receive federal protection under the ESA, the regulations differ from those for animals. Plants are not subject to the same "take" prohibitions unless harm occurs on federal lands or violates state law. Federal agencies must avoid actions that jeopardize listed plants or their critical habitat, and trade restrictions help prevent exploitation. Conservation efforts focus on habitat preservation, monitoring, and public awareness to reverse threats before extinction becomes imminent.

- **Ute Ladies'-tresses (*Spiranthes diluvialis*):** ULT is a perennial, terrestrial orchid native to wet meadows, riparian zones, and floodplains in the western U.S. It requires moist, stable habitats near springs, lakes, or perennial streams, often with undisturbed soils and native vegetation. The species has experienced significant declines due to habitat loss, water diversion, and development with most populations now small and isolated.
- **Western Prairie Fringed Orchid (*Platanthera praeclara*):** The western prairie fringed orchid is a tall, showy perennial orchid native to moist tallgrass prairies in the central U.S. It requires undisturbed, mesic to wet

prairies (with native grasses and forbs), and relies on nocturnal moths for pollination. Populations have declined sharply due to habitat loss, fragmentation, and altered hydrology, with most remaining sites small and isolated.

An initial field survey for the ULT was conducted during the 2025 survey season, within areas of potential habitat along the Project in Wyoming. While no individuals or populations of ULT were identified, one area of suitable habitat was observed. Bridger has proposed to avoid this area through HDD, restricting construction activities and equipment access within the identified habitat, and remobilizing equipment. Any surface disturbance associated with the HDD process will be located outside of the suitable ULT habitat. As designed, no surface disturbance or direct impacts to this suitable habitat is anticipated.

HDD is proposed specifically to avoid surface disturbance within areas identified as suitable habitat for ULT and to preserve existing soil conditions, vegetation, and hydrologic function. Preventative measures will be implemented during HDD activities to minimize the potential for inadvertent drilling fluid returns (frac-outs), continuous monitoring of drilling pressures, and real-time observation of drilling activities beneath the ULT habitat

Although the likelihood of a frac-out occurring within ULT habitat is low, HDD activities will be immediately suspended, and the BLM Authorized Officer will be notified. No ground-disturbing response actions will occur within ULT habitat unless expressly authorized by the BLM in coordination with the USFWS.

Initial response actions would prioritize containment, stabilization, and prevention of further migration of drilling fluids while avoiding additional disturbance to ULT habitat. Any corrective or remediation actions within ULT habitat would be implemented using the least-disturbing methods practicable and only following agency coordination. If necessary, site-specific mitigation or restoration measures would be developed in consultation with BLM and USFWS.

Additional field surveys for these species will be conducted in accordance with applicable protocols and timing windows to ensure detection of individuals and occupied habitat prior to construction. If protected species or habitats are identified, avoidance and minimization measures will be developed in consultation with appropriate agencies and documented in the CMRP. Any required ESA consultation will be completed prior to construction.

7.8.2.2 BLM Sensitive Plant Species

The BLM identifies sensitive plant species to guide land management decisions and ensure that authorized actions do not contribute to population declines or the need for listing under the Endangered Species Act, consistent with BLM Manual 6840 – Special Status Species Management. In support of the Project review, the BLM sensitive species list was evaluated in conjunction with species occurrence data from the Montana Natural Heritage Program (MTNHP) to identify plant species with potential to occur within or adjacent to the proposed Project corridor.

The BLM identified two sensitive plant species with potential to occur within or near the Project, both of which occur in or near lands administered by the Miles City Field Office (MCFO): Fendler's cryptantha (*Cryptantha fendleri*) and Visher's buckwheat (*Eriogonum visheri*). Although Fendler's cryptantha is not currently identified as occurring within the MCFO, MTNHP records include historical occurrences in Sheridan and Roosevelt counties, indicating potential for occurrence in similar habitats within the project area. Visher's buckwheat is documented from Carter County and may occur in portions of the MCFO where suitable habitat is present.

The BLM sensitive species list, informed by MTNHP occurrence data, will be used to supplement the existing botanical species list for pre-construction field surveys. Focused surveys in appropriate habitat types will be conducted to determine presence or absence of BLM Sensitive plant species and to inform avoidance, minimization, or mitigation measures, as necessary, to meet BLM sensitive species management objectives.

7.8.2.3 State Species of Concern

Montana

The MTNHP identifies plant SOC through a ranking system that evaluates global and state conservation status. This system relies on NatureServe's G-rank and S-rank metrics, which assess rarity, population trends, and threats. MTNHP prioritizes plant species based on conservation urgency. Level I species face imminent threats and require immediate conservation action. Level II species show declining trends or habitat stress and warrant continued monitoring. Agencies such as Montana Fish, Wildlife & Parks actively contribute to these assessments, ensuring that the SOC list reflects current ecological conditions.

Wyoming

Wyoming's Natural Diversity Database (WYNDD), in partnership with the Wyoming Game and Fish Department, identifies plant SOC using a framework that evaluates population trends, habitat limitations, and external threats. The Native Species Status (NSS) matrix, along with NatureServe's G-rank and S-rank systems, informs these classifications. These assessments guide conservation planning in areas affected by development—including pipeline corridors and energy infrastructure zones.

Wyoming's Species of Greatest Conservation Need (SGCN) include several rare or declining plant taxa that require targeted conservation efforts. Conservation strategies emphasize habitat protection, research, and collaborative management among state agencies, landowners, and developers. Integrating these priorities into project planning helps mitigate ecological impacts and supports Wyoming's long-term biodiversity goals.

Bridger will conduct biological surveys along the pipeline corridor to identify Montana and Wyoming SOC and use survey results to refine the pipeline route and avoid critical habitats wherever feasible. Additionally, Bridger will coordinate with the BLM, MTNHP, and WYNDD to ensure compliance with all applicable state regulations. Any required reviews will be completed as part of the NEPA process.

7.8.3 Noxious and Invasive Weeds

Surface disturbances from pipeline construction can create favorable conditions for the introduction and spread of noxious and invasive plant species. To minimize these risks, Bridger will implement the practices and commitments outlined in the Bridger Pipeline Expansion Noxious Weed Management Plan (NWMP). Please refer to ***Appendix E***. The NWMP provides the required framework for preventing, detecting, and controlling noxious and invasive weeds on all lands involved in the Project, including BLM-administered areas.

Bridger will conduct pre-construction noxious weed surveys to identify existing infestations and will apply early treatment where needed prior to ground-disturbing activities. Infested areas will be marked, and construction sequencing will proceed from north to south to reduce the spread of invasive annual grasses, including cheatgrass (*Bromus tectorum*), medusahead (*Taeniatherum caputmedusae*), and ventenata (*Ventenata dubia*). Construction equipment, vehicles, and timber mats must be cleaned, to the best extent practicable, of soil, plant debris, and weed seeds before entering the Project site for the first time. Additionally, all equipment that may have come in contact with ventenata seed or plant material must be cleaned immediately upon leaving ventenata-infested areas. Cleaning stations—using high-pressure water or compressed air—will be used where required, and all plant debris, soil, and wash material will be disposed of at approved facilities in accordance with state and federal requirements.

During construction, Bridger will implement Integrated Pest Management (IPM) practices, which may include mechanical, biological, cultural, and chemical treatments. Herbicide use on BLM and USFS administered lands will be conducted in accordance with agency specific vegetation treatment guidance and will be applied only by licensed applicators under approved Pesticide Use Proposals (PUPs). All treatment activities will follow applicable federal, state, and county weed laws, including requirements administered by Montana and Wyoming Departments of Agriculture, as well as county weed and pest districts.

Reclamation and long-term vegetation recovery are supported through the use of certified weed-free mulch, straw, and seed mixes, as well as appropriate topsoil handling in areas with isolated infestations. Following construction,

Bridger will monitor disturbed areas on BLM-administered lands for three to five growing seasons or until reclamation requirements are met. Monitoring will likely occur in the spring or early summer to identify new or recurring infestations, and Bridger will conduct additional treatment as needed to prevent seed set and reinvasion. Annual post-construction weed management reports will be provided to the BLM and other applicable agencies in accordance with NWMP requirements.

Through prevention, early detection, rapid response, and coordinated management with federal, state, and county agencies, Bridger will minimize the introduction and spread of noxious and invasive weeds and support long-term restoration of native plant communities along the pipeline corridor.

7.9 Wildlife Resources

7.9.1 Federally Protected Species

The BLM, USFS, and USFWS cooperatively manage federally listed and special status wildlife resources with the goal of avoiding or minimizing impacts.

Bridger will coordinate with the BLM, USFS, and USFWS regarding potential impacts to federally listed and special status species protected under the ESA, BGEPA, and Migratory Bird Treaty Act (MBTA), along with sensitive species identified by both BLM and USFS.

Bridger will conduct species and/or habitat surveys for a variety of wildlife species prior to construction. Information gathered from these surveys will be used to design the Project and, where feasible, to reroute portions of the alignment to avoid/minimize impacts to sensitive resources. If protected species or habitats are identified, avoidance and minimization measures will be developed in consultation with appropriate agencies and documented in the CMRP. Required ESA consultation will be conducted concurrently with the NEPA process, to ensure compliance with all applicable federal regulations.

The BLM will serve as the lead federal agency for Section 7 consultation under the ESA, and will coordinate with the USFWS, cooperating agencies, and Bridger throughout the project planning and consultation process to ensure ESA compliance. The BLM will work with Bridger to incorporate USFWS survey requirements and conservation measures into the Project planning, to develop a Biological Assessment, and to request formal and/or informal consultation on the proposed action with the USFWS as appropriate.

7.9.1.1 Endangered Species Act

The following list of federally protected wildlife species was obtained from the USFWS ECOS IPAC website on October 17, 2025, and applies to a 200-foot corridor along the project centerline:

Endangered Species

An endangered wildlife species, as defined by the USFWS, faces a very high risk of extinction throughout all or a significant portion of its range. Under the ESA, these species receive the highest level of federal protection, including a strict prohibition on "take", which encompasses actions such as harming, harassing, hunting, or killing, regardless of land ownership. Federal agencies must ensure that their actions do not jeopardize the survival of endangered animals or adversely modify designated critical habitat. Enforcement measures, recovery planning, and habitat conservation efforts work in concert to mitigate threats and promote population recovery. These protections reflect the urgency of preventing irreversible biodiversity loss and maintaining ecological integrity.

- **Northern Long-eared Bat (*Myotis septentrionalis*):** The northern long-eared bat is a federally endangered species with no designated critical habitat. It is a medium-sized bat found across much of the eastern and north-central United States and all Canadian provinces. The predominant threat to this bat is white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. Since its discovery in New York in 2006, white-nose syndrome has rapidly spread throughout the species' range in the United States. Consequently, the construction of the Project may pose adverse impacts to the Northern Long-eared Bat, and appropriate mitigation measures will be implemented to minimize these effects.

- **Whooping Crane (*Grus americana*):** The whooping crane is a federally endangered species with designated critical habitat, however the Project route does not overlap with the critical habitat. The species is present throughout much of the central United States and typically nests on the ground within wetlands, typically building a large mound of grasses and weeds with a depression in the middle.

- **Pallid Sturgeon (*Scaphirhynchus albus*):** The pallid sturgeon is a federally endangered species with no designated critical habitat. The species is present in the central United States in the Missouri River, and many other tributaries including the Yellowstone, Laramie, North Platte, South Platte, and Platte Rivers. All water features where the pallid sturgeon has been documented will be crossed utilizing HDD to avoid impacts to their habitat —therefore no adverse impacts are anticipated during the construction of the Project.

Threatened Species

A threatened wildlife species, as defined by the USFWS, is one likely to become endangered in the foreseeable future throughout all or a significant portion of its range. Under the ESA, these animals receive robust protections, including a prohibition on "take", which encompasses actions such as harming, harassing, hunting, or killing, regardless of land ownership. Federal agencies must ensure their actions do not jeopardize listed animals or destroy critical habitat. Additionally, the USFWS may issue Section 4(d) rules to tailor protection for threatened animals—often extending many of the same safeguards afforded to endangered species. Conservation efforts typically involve habitat management, population monitoring, and regulatory enforcement to mitigate threats and support recovery before extinction becomes imminent.

- **Preble's Meadow Jumping Mouse (*Zapus hudsonius preblei*):** The Preble's meadow jumping mouse is a federally threatened species with designated critical habitat; however, the Project area does not overlap with this critical habitat. The species primarily occurs in Wyoming and Colorado and typically inhabits riparian areas with dense herbaceous vegetation. Preble's Meadow Jumping Mice are nocturnal and rely on well-connected riparian corridors for movement and foraging.
- **Piping Plover (*Charadrius melodus*):** The piping plover is a small, pale shorebird that nests on sandy beaches, alkali flats, and river sandbars across North America. It requires open, sparsely vegetated habitats near water for breeding and foraging. The species has experienced significant population declines due to habitat loss, human disturbance, and predation, but targeted conservation efforts have stabilized some populations.
    - The Project crosses USFWS designated critical habitat for the piping plover. Designated critical habitat consists of specific areas along sandy beaches, alkali flats, and river sandbars that provide essential breeding, nesting, and foraging conditions for the species. These habitats are protected under the ESA to support population recovery by minimizing disturbance, preserving natural vegetation, and maintaining hydrological processes.

Proposed Endangered Species

Proposed endangered species are those that the USFWS has determined may face extinction throughout all or a significant portion of their range. These species are under formal review for listing as endangered, triggering potential protective measures. The proposal aims to prevent further decline and gather public input before final designation.

- **Tricolored Bat (*Perimyotis subflavus*):** The tricolored bat is wide ranging across the eastern and central U.S. and portions of southern Canada, Mexico, and Central America. They are often found in caves and abandoned mines during the winter, and live in forested habitats during the spring, summer and fall, where they primarily roost in trees. The predominant threat to this species is White-nose syndrome.
- **Suckley's Cuckoo Bumble Bee (*Bombus Suckleyi*):** Suckley's cuckoo bumble bee is a social parasitic bumble bee found historically across western North America. It relies on healthy populations of host bumble bees, especially the western bumble bee, and inhabits mountainous and prairie regions with suitable host nests. This species is experiencing rapid and severe population declines in recent decades—

with few observations recently plus possible extirpation in parts of its range. Its decline is closely linked to the loss and decline of its host species.

Proposed Threatened Species

Proposed threatened species are those that the USFWS identified as likely to become endangered in the foreseeable future, but not yet formally listed as threatened. These species are under review for potential protection, and the proposal initiates a process for public input and possible conservation measures. Proposed status allows for early intervention before a formal listing is finalized.

- **Monarch Butterfly (*Danaus Plexippus*):** The monarch butterfly is a large, orange-and-black migratory butterfly found across North America. Monarchs require open habitats with abundant milkweed species for larval development and diverse nectar plants for adults. Their population has sharply declined mainly due to habitat loss and reduced milkweed availability.
- **Western Regal Fritillary (*Argynnis Idalia occidentalis*):** The western regal fritillary is a large, orange-and-black butterfly historically found in tallgrass and mixed-grass prairies across western North America. It requires native prairie habitats with abundant violets for its larvae and diverse nectar plants for adults. The species has suffered dramatic population declines and range contractions due to habitat loss, fragmentation, and reduced availability of host plants. Most populations now persist only in isolated prairie remnants.

7.9.1.2 Raptors, Eagles, and Migratory Birds

Bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*), along with other raptor species, are protected under the BGEPA and the MBTA. These laws prohibit the disturbance, harassment, or destruction of eagles, other raptors, their nests, or eggs.

The MBTA is a federal law enacted in 1918 to protect over 1,000 species of native migratory birds in the U.S., including songbirds, raptors, waterfowl, shorebirds, and others. The MBTA prohibits the taking, killing, possession, or disturbance of migratory birds, their nests, or eggs without authorization.

Bald eagles are generally associated with large water bodies (such as rivers, lakes, and reservoirs, where they forage for fish). Golden Eagles and other raptors typically inhabit open landscapes, including rangelands, grasslands, shrub-steppe areas, and forested edges, preying primarily on small mammals. Raptor nests are often large and long-lived, with some nests used repeatedly over multiple years.

Migratory birds utilize a variety of habitats such as grasslands, wetlands, shrublands, forests, and even developed areas. Nesting sites range from ground scrapes and concealed vegetation to tree branches and cliffs, with some species returning to the same locations year after year. Many species rely on intact habitats and minimal disturbance during the breeding season to successfully raise their young.

Prior to construction, Bridger will conduct raptor, eagle, and migratory bird surveys, and habitat assessments, in accordance with applicable guidelines. These surveys will identify active nests, nesting territories, and foraging areas within or near the Project corridor. In lieu of surveys for ground nesting migratory birds, Bridger may mow and grub portions of the project corridor prior to the migratory bird breeding and nesting season which occurs from March 15 to July 15. Bridger will also train personnel to recognize, avoid nests, and maintain buffers around identified nesting sites.

Survey results will guide the Project design, construction scheduling, and implementation of avoidance and minimization measures to reduce disturbance to raptors. Where active nests are identified, construction will comply with seasonal restrictions and buffer distances recommended by the USFWS and BLM—including measures to protect breeding and fledgling raptors.

Bridger will coordinate with the BLM, USFS, and USFWS to ensure compliance with all applicable federal regulations and required consultations as part of those regulations. These measures are intended to minimize potential impacts to raptors and eagles while allowing construction activities to proceed safely and responsibly.

7.9.2 State Species of Concern

Montana and Wyoming maintain detailed lists of SOC to guide conservation planning and inform infrastructure development. These species face threats from habitat loss, environmental stressors, and human activity.

7.9.2.1 Montana Species of Concern and Rating Criteria

MTNHP identifies SOC using a ranking system that evaluates global and state conservation status. The system incorporates NatureServe's G-rank and S-rank metrics, which assess rarity, population trends, and threats. Montana Fish, Wildlife & Parks and other agencies contribute to these assessments, ensuring that the SOC list reflects current ecological conditions.

Montana's SOC list includes a wide range of taxa (such as the endangered pallid sturgeon, the black swift, and the greater sage-grouse). These species are prioritized based on vulnerability and conservation urgency. For example, Level I birds of concern, such as the whooping crane, face imminent threats and require immediate conservation action. Level II species, like the mountain plover, are monitored closely due to declining trends or habitat pressures.

7.9.2.2 Wyoming Species of Concern and Rating Criteria

Wyoming Natural Diversity Database and the Wyoming Game and Fish Department use a similar framework to identify and rank SOC. The NSS matrix evaluates population trends, habitat limitations, and external threats. NatureServe's G-rank and S-rank systems also inform these classifications.

Wyoming's SGCN include mammals (such as the Canada lynx and North American wolverine), birds like the piping plover, and amphibians such as the Wyoming toad. These species are considered at risk due to habitat fragmentation, climate change, and human disturbance. Conservation efforts focus on habitat protection, research, and collaborative management.

Bridger will conduct biological surveys along the pipeline corridor to identify Montana and Wyoming SOC and use survey results to refine the pipeline route and avoid critical habitats wherever feasible. Additionally, Bridger will coordinate with the BLM, MTNHP, and WYNDD to ensure compliance with all applicable state regulations. Any required reviews will be completed as part of the NEPA process.

7.9.2.3 Greater Sage Grouse

The Project, which traverses portions of Montana and Wyoming, intersects habitat for the greater sage-grouse (a species whose populations have declined significantly). Both states have issued executive orders and implemented conservation programs to protect sage-grouse habitat, particularly within designated "core areas" that support the highest densities of breeding leks and nesting grounds. In Wyoming, the Sage-Grouse Executive Order mandates the use of the Density Disturbance Calculation Tool (DDCT) to assess/limit surface disturbance within core areas. Montana's Sage-Grouse Habitat Conservation Program requires consultation and mitigation for projects within mapped habitats.

Pipeline construction poses several potential risks to sage-grouse, including direct habitat loss, increased predation from infrastructure, and disruption during critical seasonal periods. Rerouting efforts are essential to bypass high-value lek sites and intact sagebrush stands. Where avoidance is not feasible, minimization strategies include narrowing the construction footprint, applying timing stipulations, and restoring disturbed areas with native vegetation. BMPs such as installing perch deterrents on overhead structures, controlling noxious and invasive species, and implementing erosion control measures further reduce long-term habitat degradation.

If residual impacts remain after avoidance and minimization, compensatory mitigation may be required under Montana's Habitat Quantification Tool (HQT) or Wyoming's mitigation credit frameworks. These credits support habitat restoration or protection elsewhere in the landscape. Ultimately, successful implementation of these measures ensures compliance with state and federal conservation strategies while balancing responsible infrastructure development with ecological stewardship.

Additionally, the Project will comply with BLM RMPs Required Design Features (RDFs) for greater sage-grouse habitat in Montana and Wyoming. The Project will design and locate roads and pipelines to avoid important sage-grouse areas (where feasible), minimize new surface disturbance, and use existing utility corridors wherever possible. Construction would employ use of HDD, when feasible, and restrict tall structures and fences to the minimum necessary. Where avoidance is not feasible, the Project may be rerouted, necked down to minimize the disturbance footprint, and use reclamation practices to promote vegetation recovery.

As part of the NEPA process, Bridger will prepare a Sage Grouse Conservation Plan (SGCP) that specifies strategies for avoiding, reducing, and mitigating impacts related to construction. The SGCP will expand upon the mitigation measures presented here. Examples include:

- Equip above-ground facilities to discourage raptor and corvid nesting.
- Implement dust abatement.
- Control and minimize noxious and invasive species.
- Restrict vehicle traffic, rehabilitate duplicate roads, and maximize interim reclamation on long-term access roads.
- Restore all temporarily disturbed areas to pre-disturbance landforms and desired plant communities, with objectives focused on sage-grouse habitat needs.

7.9.3 Big Game

Big game species such as white-tailed deer, mule deer, elk, and pronghorn depend on crucial winter range habitats that provide limited forage, shelter, and energy conservation needed for survival. Disturbances during winter, such as human activity, traffic, or construction, reduce habitat effectiveness, increase energetic stress, and can lower survival rates, making protection of these areas essential.

Prior to surface occupancy or use, the BLM requires the creation of a plan that demonstrated how proposed activities will maintain the functionality of crucial winter range habitat. This plan must be reviewed and approved by the Authorized Officer who will ensure that surface occupancy, construction activities, and operational access will not adversely affect forage availability, shelter conditions, movement patterns, or other key ecological functions during the winter use period. Bridger will coordinate with the BLM and other applicable state or federal wildlife agencies to ensure compliance with relevant habitat protection requirements. Aerial surveys for big game were conducted by Bridger along the entire pipeline route during the period from January 1, 2026, through February 28, 2026.The objective of the big game surveys was to document the presence, general distribution, and relative abundance of big game species within and adjacent to the project area during winter conditions. The survey data and a report will be provided to BLM. Where crucial winter range is identified through historic data and the aerial surveys, construction or surface activity may be conditioned upon the approved plan and seasonal considerations. This may include timing limitations, reduced activity levels, or spatial adjustments to avoid concentrated wintering areas.

7.10 Land Use

Construction of the Project on federally administered lands will be managed to minimize conflicts with existing land uses and to comply with federal land use allocations and objectives. The BLM ARMPs and USFS LRMP emphasize multiple use and sustained yield, requiring that new projects be sited and constructed in a manner that avoids or minimizes adverse impacts to other authorized uses, such as grazing, recreation, wildlife habitat, and access to mineral resources.

During construction, surface disturbance will be limited to the smallest area necessary, and activities will be confined to designated ROW and previously disturbed corridors whenever feasible. The Project will coordinate with existing land users, including grazing permittees and recreationists, to reduce disruptions and maintain access to

public lands. Temporary access roads and workspaces will be sited to avoid sensitive resources. After construction is complete, temporary access roads and workspaces will be promptly reclaimed.

Restoration and reclamation of disturbed areas will begin as soon as practicable after construction, with reseeding using native plant species and monitoring to ensure successful recovery. The Project will remove temporary facilities and infrastructure upon completion of construction. After, the Project will restore the land to a condition compatible with the surrounding landscape and land use objectives.

Throughout the construction process, Bridger will coordinate closely with the BLM and other stakeholders to address land-use conflicts, monitor compliance with land-use stipulations, and make adjustments as needed to ensure that the Project supports the BLMs goals for resource protection, public access, and sustainable land management.

7.10.1 Transportation Resources and Traffic Control

The Project route crosses a variety of transportation infrastructure—including federal, state, and county highways, local roads, and private access roads. These transportation resources support commercial, agricultural, and recreational uses, and are subject to applicable federal, state, and local traffic, safety, and maintenance regulations.

Construction activities may temporarily affect transportation resources due to increased traffic, equipment transport, and construction-related road use. Potential impacts include:

- Temporary lane closures or detours on local and county roads.
- Increased traffic congestion during construction periods.
- Roadway wear or minor damage from construction vehicles.
- Interference with public or emergency vehicle access if not properly managed.

To minimize these impacts, Bridger will implement a comprehensive traffic control program, including:

- Coordination with local, county, and state transportation authorities.
- Utilizing existing access roads, wherever feasible.
- Encourage contractors to provide shuttles or carpooling to minimize traffic volumes to and from the jobsites.
- Maintaining clear signage, speed limits, flaggers, and other traffic control measures at road crossings and critical points to protect the public, construction personnel, livestock, and third-party property.
- Implementing vehicle wash stations at strategic locations to prevent the spread of noxious and invasive species.
- Restoring temporary access roads and disturbed surfaces promptly following construction, stabilized and revegetated according to BLM standards.

Construction traffic will be confined to the smallest area necessary to complete the work. On BLM lands, vehicle movement will be limited to designated access roads, two-track primitive roads, and the permanent ROW or temporary construction corridor. Temporary barriers, fencing, and warning signs will be installed, as needed, to protect public safety and natural resources.

Throughout construction Bridger, will monitor traffic patterns and adjust operations as needed to address changing site conditions or unforeseen issues. This approach ensures that construction activities proceed safely, efficiently, and in accordance with federal and local regulations while minimizing impacts to transportation resources, natural resources, and existing land uses.

7.10.2 Visual Resources

This POD provides a conceptual description of anticipated visual impacts and avoidance measures; detailed visual impact analysis, including Key Observation Point (KOP) identification and Visual Contrast Ratings, would be conducted during preparation of the NEPA document.

Landscape characteristics within the Project area consist primarily of rolling to gently undulating terrain, with localized breaks and drainages. Land cover is dominated by native and non-native grasslands, agricultural lands, and limited shrubland vegetation, with scattered rural development. The visual character of the area is generally open and expansive.

Potential visual impacts associated with the Project would primarily occur during construction and include temporary physical disturbance of landforms, vegetation, and soils within the pipeline ROW. Construction activities would introduce visual elements that may contrast with the existing visual environment in terms of color, line, and texture. However, pipeline construction is inherently linear and mobile in nature and progresses relatively rapidly along the approved route. Topographic modification would be minor, as the pipeline would generally follow existing terrain, and backfill would restore the ground surface to near-original contours.

Following construction, disturbed areas within the ROW would be promptly reclaimed and reseeded using approved native seed mixes appropriate to surrounding land uses. Reclamation would reduce visual contrast over time, and in agricultural areas, visual effects would be further minimized following the first crop cycle. The Project would avoid heavily forested lands where practicable; therefore, permanent vegetation clearing and long-term visual impacts would be limited. After reclamation, visual effects of the buried pipeline would be minimal and largely indistinguishable from the surrounding landscape.

Aboveground facilities associated with the Project would be limited in number and extent on federal lands. These facilities include MLVs and pump stations, all of which would be located within the permanent ROW and sited to minimize visual contrast with the surrounding landscape. MLVs would be low-profile facilities located within the permanent ROW, while pump stations would have a larger footprint and require additional permanent ROW. The locations of aboveground facilities proposed on federal lands are identified in ***Table 3: MLVs on Federal Lands*** ***Table 4***: ***Pump Station Locations.***

Aboveground facilities would be designed and constructed to reduce visual contrast. Facilities would be painted in colors consistent with the BLM Standard Environmental Color Chart, and layout, height, and orientation would be considered to minimize visual prominence where practicable.

The Project would include both temporary and permanent access roads on federal lands, which could result in minor, localized visual changes associated with ground disturbance and the presence of linear features. Visual contrast may occur from vegetation removal, exposed soils, or gravel surfacing, primarily during construction. Visual effects from temporary access roads would be short term and are expected to diminish as reclamation progresses. Permanent access roads may create subtle, longer-term changes where maintained access is required; however, these roads would generally follow existing contours and be designed to blend with surrounding landforms. Overall visual effects would be limited in extent and addressed through siting, design, and reclamation measures, as appropriate.

Visual resources are evaluated based on the aesthetic value of the natural and developed landscape, the public value of viewing the landscape, and visibility from sensitive viewpoints, including residences, recreation areas, designated travel routes, and other publicly accessible locations. Evaluation of potential visual impacts considers the physical characteristics of the landscape, its capacity to absorb visual change, and viewer sensitivity to scenic quality. Together, these factors define the level of acceptable visual modification.

BLM

The BLM is responsible for identifying and protecting scenic values on public lands they administer under the Federal Land Policy and Management Act of 1976 (FLPMA) and NEPA. The BLM VRM system provides a framework for managing visual resources in a systematic, interdisciplinary manner by establishing management objectives for four VRM classes.

VRM classes are established through land use plan decisions. The Project will conform to the VRM allocations specified in the applicable RMPs. References to no surface occupancy (NSOs) and controlled surface use (CSUs) are part of the VRM framework in the land use plans and impose project-level restrictions.

The VRM classifications and associated management objectives applicable to the Project are summarized in ***Table 20: BLM VRM Classifications.***

Table 20: BLM VRM Classifications

VRM Class	Management Objective	Description
Class I	Preserve the existing character of the landscape.	The objective is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.
Class II	Retain the existing character of the landscape.	The objective is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
Class III	Partially retain the existing character of the landscape.	The object is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.
Class IV	Allow major modification of the existing character of the landscape.	The objective is to provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. Management activities may dominate the view and may be the major focus of viewer attention. However, the impact of these activities should be minimized through careful siting, minimal disturbance, and repeating the basic elements of form, line, color, and texture within the existing setting.

Based on GIS data provided by the BLM, which extend beyond BLM-administered lands, approximately 90 percent of the proposed Project route is located within VRM Class III and Class IV areas. Approximately 8 percent of the Project occurs within VRM Class II areas, with the remaining approximately 2 percent located on USFS–administered lands. Please refer to ***Figure 28: VRM* Classifications**.

Within VRM Class II areas, where the management objective is to retain the existing character of the landscape, Key Observation Points (KOPs) will be identified first, based on public access, frequency of use, viewing duration, and viewer sensitivity. Visual Contrast Ratings will then be completed following KOP establishment, in accordance with the VRM Handbook and BLM guidance. This detailed analysis will be conducted during the NEPA process to evaluate potential changes in form, line, color, and texture associated with Project construction, operation, and reclamation, ensuring that visual impacts are appropriately assessed and mitigated. Visual impacts in WSAs and ACECs will also be specifically evaluated to ensure consistency with RMP VRM allocations. Within VRM Class II

areas, where the management objective is to retain the existing character of the landscape, visual impacts would be subject to enhanced evaluation during the NEPA process. The NEPA visual analysis is expected to include identification of KOPs based on public access, frequency of use, viewing duration, and viewer sensitivity.

To minimize potential visual impacts within VRM Class II areas, HDD would be considered and utilized where feasible, consistent with engineering, environmental, and safety constraints. Where HDD is not practicable, surface disturbance would be minimized through reduced construction footprints, careful siting of temporary facilities, and implementation of visual mitigation measures designed to retain the existing landscape character.

Temporary nighttime lighting will comply with VRM Class objectives by minimizing visual contrast and avoiding attention-attracting features. Fixtures will be fully shielded and directed downward to reduce visibility from adjacent viewpoints and recreational areas. Lighting will be restricted to the active work area only and removed immediately after nighttime work concludes.

USFS

The USFS is responsible for identifying and protecting scenic values on National Forest System (NFS) lands, including the Thunder Basin National Grassland (TBNG). This responsibility is mandated under NEPA and the agency's own planning regulations. The USFS uses the Scenery Management System (SMS) to systematically evaluate, manage, and protect visual resources. The SMS establishes Scenic Integrity Objectives (SIOs) for different areas, which guide how land management activities, such as oil and gas development, must be conducted to maintain or enhance scenic quality. The management objectives for each of the SIO classes are displayed in ***Table 21: USFS SIO Classifications.***

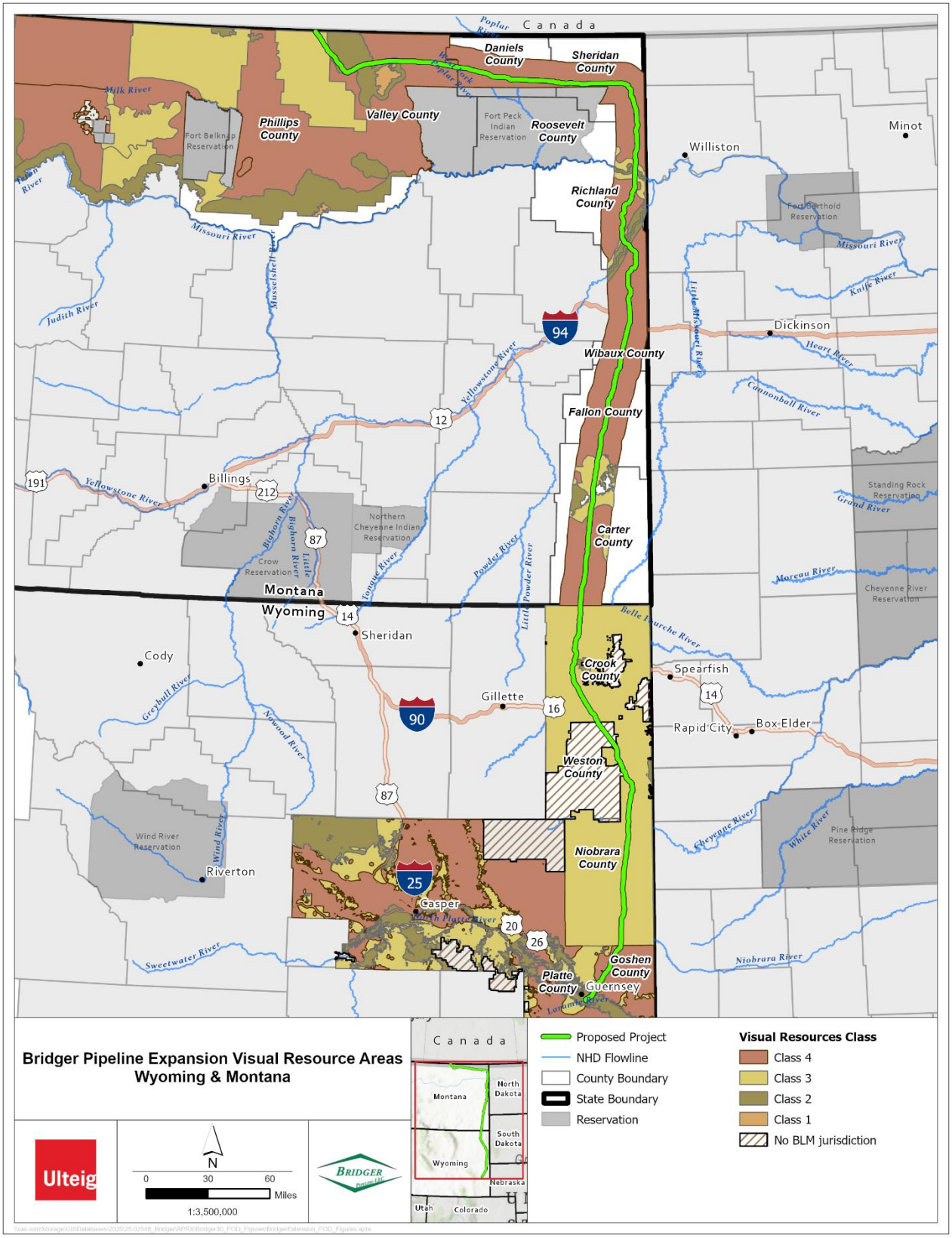
Table 21: USFS SIO Classifications

SIO Class	Management Objective	Description
High	Maintain the landscape character intact.	The objective is to maintain the existing scenic character of the landscape so that human activities are not evident to the casual observer. Management activities must be unseen or barely noticeable, and any visual changes should preserve the natural appearance of the landscape.
Moderate	Maintain a landscape character that is no more than slightly altered.	The objective is to maintain scenic character while allowing slight alterations. Visual changes may be apparent but must remain visually subordinate to the surrounding landscape and should not draw attention or dominate views.
Low	Allow for more noticeable change while retaining overall scenic integrity.	The objective allows for more evident visual change, provided the modifications do not dominate the landscape. Management activities may attract attention but should still maintain overall scenic integrity and visual coherence.

During Project design and future NEPA review, visual impacts would be evaluated to ensure consistency with applicable BLM VRM and USFS SIO objectives, including WSAs, ACECs, and VRM Class II areas**.** Project construction and reclamation methods are anticipated to be designed to meet the specific visual management objectives for each affected area. Surface disturbance would be limited to the minimum necessary, and construction activities would be coordinated to reduce both the duration and extent of visual disruption.

Temporary facilities, equipment, and material stockpiles would be sited to blend with existing landforms and vegetation where feasible, particularly in areas managed for visual resources. Reclamation and restoration activities would be implemented following construction, and disturbed areas would be reseeded using native plant species to promote visual recovery and reduce contrast. The Project is anticipated to implement BMPs for visual resource protection, including the use of compatible colors and materials for aboveground structures and careful placement of access roads and utility corridors to minimize visual intrusion. These measures would be further refined during NEPA review, as appropriate, to ensure consistency with visual resource objectives.

Figure 28: VRM Classifications



7.10.3 Wilderness Areas

Wilderness areas are managed to maintain their natural character and ecological integrity, and generally prohibit permanent structures, motorized vehicles, and mechanized equipment (except as expressly authorized for management purposes).

The Project route does not traverse any designated wilderness areas; however, portions of the alignment are adjacent to or near Wilderness Study Areas (WSAs), including Bitter Creek WSA, as well as other special management areas such as the Frenchman Breaks Area of Critical Environmental Concern (ACEC). Refer to ***Figure 29: Wilderness Study Areas.***

Activities in or near wilderness areas, WSAs, or other special management designations have the potential to introduce temporary visual, noise, or dust-related impacts, which could affect visitor experience, recreation, and ecological resources. Detailed evaluation of potential impacts to these areas will be conducted during the NEPA process in coordination with the appropriate managing agencies.

Bridger will implement construction practices designed to avoid or minimize impacts on wilderness values, where required, including:

- Restricting construction equipment and traffic to the approved ROW and existing access roads.
- Limiting noise and dust generation through BMPs, including proper equipment maintenance, use of mufflers, and dust suppression measures.
- Avoiding permanent alterations to terrain, vegetation, or hydrology within or adjacent to wilderness boundaries.
- Ensure compliance with all applicable regulations and management plans.

Because the Project does not directly cross designated wilderness areas, impacts are expected to be temporary and minor. The natural character, ecological integrity, and recreational values of these areas are expected to be maintained.

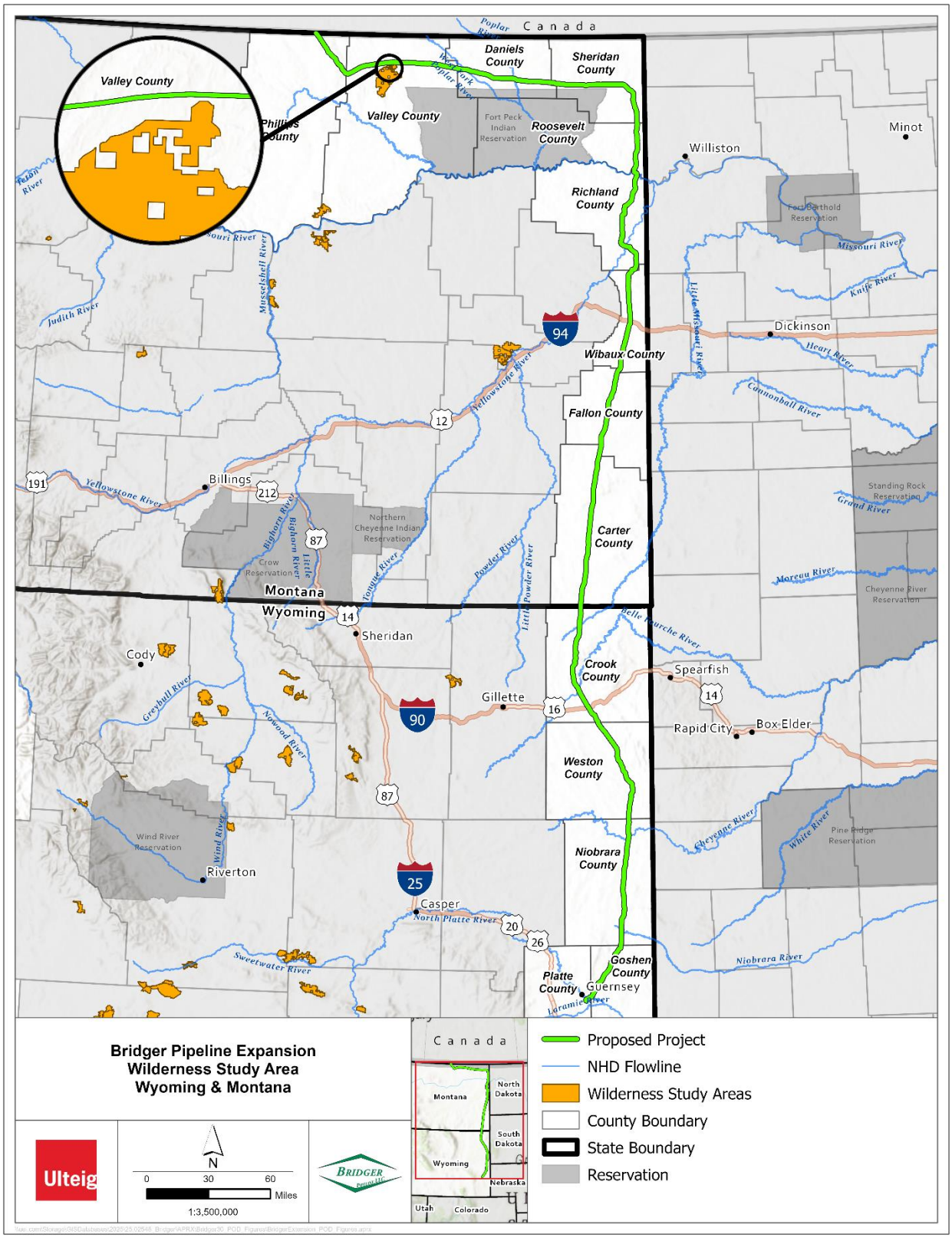
7.10.3.1 Lands with Wilderness Characteristics

The Project does not cross any designated wilderness areas; however, portions of the route may intersect or occur near lands identified by the BLM as having wilderness characteristics (LWCs). LWCs are areas that possess wilderness attributes such as naturalness, opportunities for solitude, and primitive recreation, but are not formally designated as wilderness under the Wilderness Act.

Existing BLM inventories for LWCs in Carter, Phillips, and Valley Counties were completed more than 10 years ago and may require review and update. Bridger will coordinate with the BLM to:

- Review existing LWC inventories and determine whether any LWCs occur within or adjacent to the Project corridor.
- Conduct additional surveys or evaluations if inventories are outdated or incomplete.
- Identify potential impacts to LWCs and develop avoidance or minimization measures where practicable, such as route adjustments, timing restrictions, and implementation of BMPs to maintain natural character.

Figure 29: Wilderness Study Areas



7.10.4 Recreation

Public lands crossed by or adjacent to the Project are used for a variety of dispersed and developed recreational activities. The Project crosses BLM-administered lands within the multiple BLM field offices, which encompasses a range of recreation settings and management objectives. Recreation settings within the Project area are generally rural and open in character and support activities including hunting, fishing, hiking, wildlife viewing, camping, horseback riding, boating, and sightseeing, and outfitted recreational use. Recreation use on BLM- and USFS-managed lands is primarily dispersed; however, developed recreation areas, designated travel routes, river access points, and permitted outfitter areas occur in certain locations.

The Project crosses or is adjacent to lands managed for recreation, including Extensive Recreation Management Areas (ERMAs) administered by the BLM Newcastle Field Office and the Lewis and Clark Special Recreation Management Area (SRMA). ERMAs are managed to provide a variety of dispersed recreational opportunities while accommodating other multiple-use activities, with an emphasis on maintaining access and protecting natural, cultural, and scenic resource values. The Lewis and Clark SRMA is managed in accordance with applicable BLM land use plan direction to support recreational use and protect scenic and natural resource values, including opportunities for both land- and water-based recreation. Recreational considerations within these areas will be evaluated in coordination with the BLM to avoid or minimize potential impacts and ensure consistency with land use plan objectives.

The Project also crosses river corridors associated with the Lewis and Clark National Historic Trail (NHT), which generally follows portions of the Missouri and Yellowstone Rivers. While the National Park Service serves as the lead administrative agency for the NHT, the BLM assists with management and administration of the trail within certain Field Offices. Recreation use of these river corridors contributes to the NHT visitor experience and is subject to applicable trail management objectives. Cultural and historic considerations associated with the NHT are addressed in ***Section 7.10, Cultural Resources***.

In addition to the SRMA and NHTs, an evaluation was conducted of data from the Glasgow and Malta Field Office regions (HiLine). No designated recreation areas appear to be located within the Project and impacts are not anticipated. Please refer to ***Figure 30: Recreation Resources.***

Access to recreational areas within the Project vicinity occurs via a network of existing BLM- and USFS-designated roads and trails, some of which may also be used for Project construction, operation, and maintenance. While the pipeline route may not directly cross all developed recreation sites, temporary use of access roads or increased traffic during construction could affect access to recreation areas, trailheads, river access points, or outfitter staging areas.

During construction, recreational use of affected areas may be temporarily restricted for safety reasons, and some recreation users may choose to relocate to nearby areas. Hunting is anticipated to be the predominant recreational use on many BLM lands crossed by the Project. Construction activities occurring during hunting seasons or peak recreation periods could temporarily limit access to localized areas within active construction zones or along shared access routes. Outfitters and guides operating under BLM- or USFS-issued permits may experience short-term disruptions during construction due to temporary access restrictions, increased traffic, or noise within or adjacent to permitted areas. These impacts are expected to be temporary and localized.

Following completion of construction and implementation of reclamation measures, recreational access and use are expected to return to pre-construction levels. Long-term impacts to recreation are not anticipated however, periodic maintenance activities may result in short-term, localized access restrictions similar to those during construction. These activities will be coordinated with land management agencies to minimize disruption.

Temporary disruptions during construction and maintenance could affect permitted outfitters and guides, particularly those supporting hunting and other recreation services. These disruptions may include reduced access to trailheads or staging areas during active construction, temporary closures or reroutes of roads and trails, increased noise and traffic that may diminish the quality of the recreation experience, and short-term

displacement of wildlife that could affect hunting success or wildlife-viewing opportunities. While economic impacts are expected to be short-term and localized, they will be further evaluated during the NEPA process in coordination with BLM and USFS. Bridger will work with land management agencies and permit holders to minimize disruptions where practicable.

Bridger will coordinate with the BLM and USFS to minimize disruptions to recreational users, including permitted outfitters, where practicable. Measures may include timing construction activities to avoid peak recreation seasons when feasible, maintaining access to developed recreation areas where safe, coordinating use of shared access routes, and providing advance notice of temporary closures or access restrictions.

A detailed evaluation of recreation settings, access routes, outfitter operations, and potential impacts—particularly within the Lewis and Clark SRMA and along the Lewis and Clark NHT—will be conducted during the NEPA process in coordination with the appropriate land management agencies.

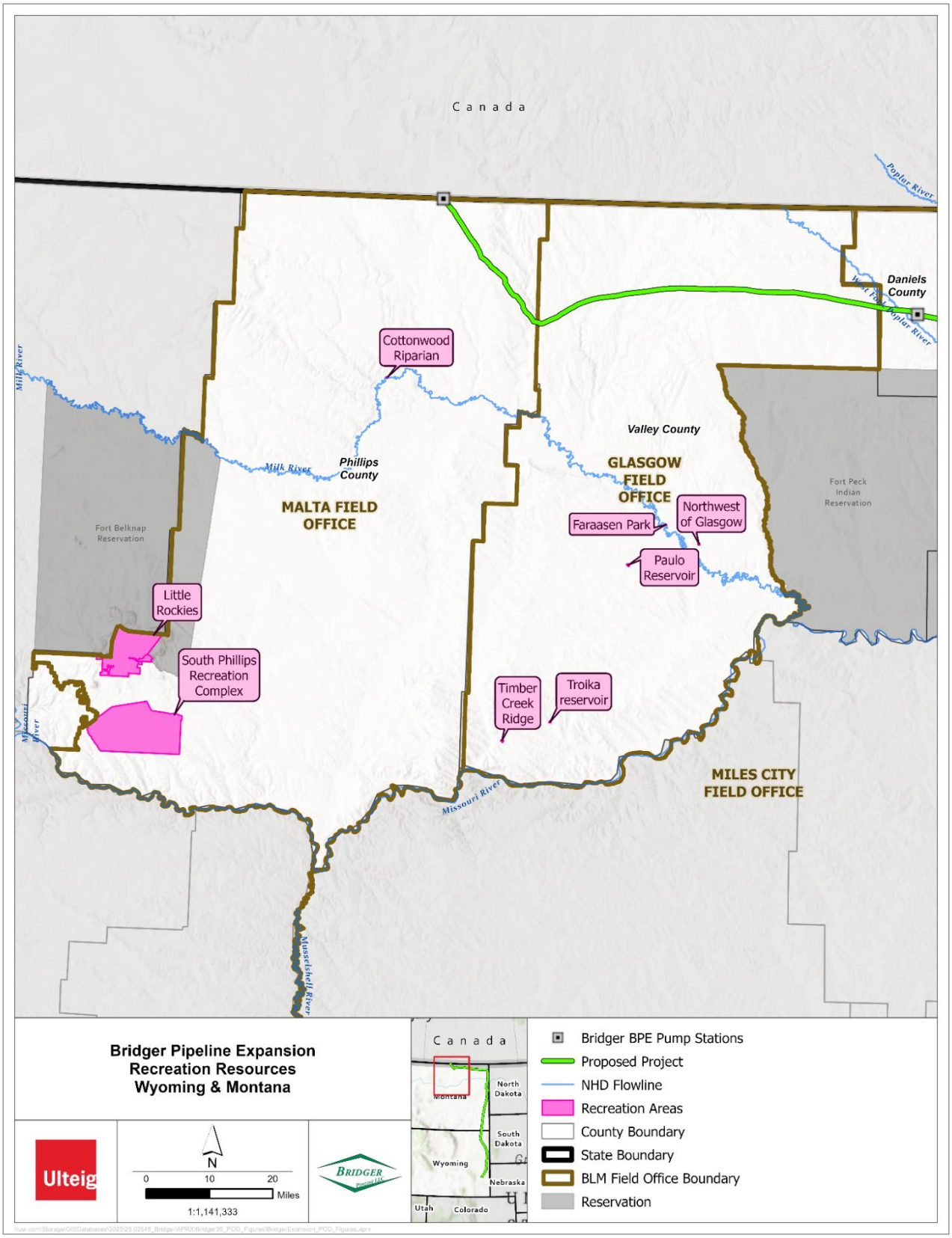
7.10.5 Lewis and Clark National Historic Trail and SRMA

The Project intersects portions of the Lewis and Clark National Historic Trail (LCNHT) corridor and the Lewis and Clark Special Recreation Management Area (SRMA) as designated in the BLM ARMP (Appendix O). The official analysis area for the LCNHT includes the ½-mile corridor on both sides of the trail centerline, as determined by the National Park Service.

While a detailed evaluation of recreation settings, access routes, outfitter operations, and potential impacts—particularly within the Lewis and Clark SRMA and along the LCNHT—will be conducted during the NEPA process (see Section 7.9.4), this POD provides preliminary commitments to avoid and minimize impacts:

- **Disturbance and Restoration:** Acres of temporary disturbance and permanent ROW within the SRMA will be quantified during NEPA; all temporary disturbance will be reclaimed using BLM-approved seed mixes and erosion control measures.
- **Visual Resources:** Construction activities within VRM Class II areas will be designed to minimize contrast; HDD will be considered at major crossings, and temporary lighting will comply with BLM Technical Note 457.
- **Visitor Experience and Access:** Temporary access restrictions may occur for safety; Bridger will coordinate with BLM and NPS to maintain trail integrity and provide advance notice of closures.
- **Character-Defining Features:** Sensitive features such as river corridors and scenic viewpoints will be protected through HDD and micro-siting.
- **Interpretive Opportunities:** No permanent structures will be placed within the SRMA; disturbed areas will be promptly reclaimed to restore scenic and recreational values.

Figure 30: Recreation Resources



7.11 Cultural Resources

Protection of cultural resources is defined by a series of federal laws designed to manage and protect these national assets from damage or loss due to federally funded or permitted activities. These laws include but are not limited to: the Antiquities Act of 1906, Historic Sites Act of 1935, Executive Order 13007, Executive Order 11593, Archaeological and Historic Preservation Act of 1974, Archaeological Resources Protection Act of 1979, and Section 106 of the NHPA of 1966, as amended. These federal regulations provide the necessary guidance on the protection of cultural resources.

The Project crosses river corridors associated with the Lewis and Clark National Historic Trail (NHT), a federally designated National Historic Trail administered by the National Park Service in coordination with other federal land management agencies. The NHT is considered a historic resource under the National Trails System Act and is a historic property for the purposes of Section 106 of the NHPA. Recreation and land management considerations associated with the NHT are discussed in ***Section 7.9.4, Recreation***.

A detailed evaluation of potential impacts to the Lewis and Clark NHT—including effects on historic integrity (setting, feeling, and association), visitor experience, and interpretive opportunities—will be conducted during the NEPA process in coordination with BLM, NPS, and SHPOs. This evaluation will include identification of character-defining features within the official ½-mile corridor, quantification of temporary disturbance and permanent ROW within the SRMA, and assessment of visual impacts consistent with BLM VRM Class II objectives.

Preliminary avoidance and minimization commitments include:

- Utilizing HDD at major river crossings within the Lewis and Clark NHT corridor to avoid direct disturbance to sensitive features.
- Limiting construction footprint and implementing VRM-compliant reclamation practices to restore scenic and historic values.
- Coordinating with BLM, NPS, and SHPOs during Section 106 consultation to ensure compliance and protection of historic values.

Cultural resource consultations with Montana and Wyoming SHPOs will follow established federal and state protocols to ensure the protection of significant historical and archaeological sites. The BLM is developing a PA in coordination with the SHPOs, other federal and state agencies, Bridger, and Native American Tribes and Communities to provide the framework for resource identification, management, and consultation on cultural and tribal resources. While the PA is in development, BLM will initiate early communication with the appropriate SHPOs and Tribal Historic Preservation Offices (THPOs) to share project details and identify areas of potential concern.

BLM will serve as the formal lead federal agency for NHPA compliance. Following approval of the PA, BLM will initiate consultation with the SHPOs, which will include review of cultural resource surveys, evaluation of potential impacts to historic properties, and consideration of measures to avoid, minimize, or mitigate adverse effects to known cultural resources. The BLM and Bridger will document all correspondence and findings, incorporate SHPO recommendations into Project planning, and ensure compliance with the National Historic Preservation Act, the PA and applicable state regulations.

7.12 Native American Consultation

Bridger recognizes that the BLM, as the lead federal agency, is responsible for conducting meaningful government-to-government consultation with tribes regarding treaty rights and trust resources, as required by Executive Order 13175 and other mandates. Additionally, the American Indian Religious Freedom Act of 1978 (AIRFA) affirms the rights of Native Americans to practice their traditional religions, including access to sacred sites and use of sacred objects, which will be considered during project planning and consultation efforts. Tribes with traditional or cultural ties to the Project area retain the right to conduct cultural activities and exercise treaty rights (such as hunting, fishing, and gathering, on federal lands within the project corridor). The BLM will continue to engage in formal consultation with tribal governments to ensure that tribal officials have meaningful input in the environmental and

cultural review of the Project to determine whether the Project may affect properties or sites of religious or cultural importance.

7.12.1 Bridger Tribal Engagement

Bridger is committed to meaningful tribal engagement throughout the Project. They will coordinate with tribal governments early in the planning process to identify and address concerns related to cultural resources, land use, and environmental protection. Bridger will provide timely information about project activities, seek input on potential impacts, and incorporate tribal perspectives into decision-making. Bridger's approach reflects a dedication to building collaborative relationships, honoring tribal sovereignty, and complying with all applicable federal and state requirements.

7.13 Health and Safety

Bridger will design, construct, and operate the pipeline in full compliance with PHMSA regulations—including all requirements listed in the Transportation of Hazardous Liquids by Pipeline guidance (49 CFR Part 195). The pipeline corridor will be routed and designed to minimize risks to public health and safety. Careful consideration of factors like pipeline thickness, material, pressure rating, burial depth, soil type, vegetation, topography, proximity to structures and roads, and the potential for leaks, fire, or explosion will be taken. The pipeline will incorporate features for internal cleaning and inspection, such as cleaning pigs and smart pigs, to maintain system integrity. Visual monitoring to identify leaks or maintenance issues will occur at regular intervals, not to exceed 3 weeks, but at least 26 times a calendar year and may be completed as aerial patrols or on the ground surveys.

During construction, personal safety will be paramount. Operators will ensure that first aid kits and fire extinguishers are available in every vehicle, and all personnel will wear required PPE, maintained in good condition—including hard hats, safety glasses, and safety-toed boots. Should visibility conditions dictate, personnel may be required to wear Class III high-visibility vests. Personnel will report unsafe conditions and accidents immediately. Safety barriers, signage, fencing, or flagmen will be used to protect the public, livestock, and third-party property. Additionally, all ground disturbing activities will require coordination with the Montana or Wyoming One Call Systems prior to occurrence.

Pipeline markings are essential for public safety, regulatory compliance, and required maintenance activities. Bridger will install clearly visible markers along the pipeline ROW at regular intervals and at all road, railroad, and waterway crossings. They will follow all requirements set forth by the PHMSA and relevant state agencies—including specifications for marker placement, color, and information content. Bridger will routinely inspect and replace markers as needed to maintain compliance and ensure ongoing safety throughout the life of the pipeline.

7.13.1 Landslides

The Project traverses diverse terrain in Wyoming and Montana, including river valleys, steeper foothills, and sedimentary basins. Slope instability potential along the route was evaluated using a regional landslide susceptibility dataset (***Figure 31: Slope Instability***). This dataset assigns confidence values from 1 to 5 (CONUS 1–5), where 1 represents the lowest confidence of slope failure occurrence and 5 represents the highest confidence based on terrain, geology, and historical landslide indicators.

As shown in ***Figure 31***, much of the alignment crosses areas mapped as CONUS 1 or 2, indicating low overall landslide susceptibility across the plains and gently sloping basin topography. However, localized segments intersect areas of moderate to high confidence (CONUS 3–5), primarily where the route approaches river valleys and dissected uplands. These higher confidence areas are most notable along portions of the Missouri, Yellowstone, Bighorn, Powder, and North Platte River valleys, as well as within foothill and escarpment terrain in eastern Montana and northeastern Wyoming. In these locations, steeper slopes adjacent to watercourses and erosional features increase the potential for shallow slope failures.

Geologic materials along the corridor include shale, sandstone, colluvium, and glacial and alluvial deposits. When saturated by prolonged precipitation or rapid snowmelt, these materials may lose shear strength, increasing the

likelihood of shallow landslides or localized debris movement. Areas of cut and fill associated with pipeline construction can further increase susceptibility if not properly stabilized, particularly where the alignment coincides with CONUS 4 or 5 mapping.

To minimize landslide risk, the Project would implement slope stability and erosion control measures tailored to site-specific conditions and mapped susceptibility. Trench breakers would be installed at regular intervals on slopes to prevent subsurface water from concentrating and flowing along the trench line. On moderate to steep slopes, construction techniques such as benching, slope rounding, and terracing would be used to reduce runoff velocity and improve long-term stability. Disturbed areas would be stabilized as soon as practicable using erosion control blankets, mulch, seeding, and other appropriate best management practices.

In segments mapped as moderate to high confidence for slope instability (CONUS 3–5), additional design and construction controls may be applied. These could include slope-specific geotechnical evaluations, enhanced surface and subsurface drainage, selective use of retaining or reinforcement measures, and construction timing to avoid periods of peak soil saturation.

Where historical or field-identified instability is present, the Project may incorporate targeted post-construction monitoring. Monitoring methods could include periodic visual inspections, survey monuments or surface markers to detect ground movement. This monitoring would allow early identification of slope movement so that corrective actions—such as drainage improvements, regrading, or structural reinforcement—can be implemented if needed to protect pipeline integrity.

7.13.2 Erionite

Erionite poses significant health hazards due to its fibrous nature, which closely resembles that of asbestos. When erionite fibers become airborne and are inhaled, they can lead to severe respiratory illnesses—including mesothelioma: a rare cancer affecting the lining of the lungs and abdomen and lung cancer. The International Agency for Research on Cancer (IARC) has identified erionite as a Group 1 carcinogen, confirming its cancer-causing potential in humans.

The primary risk of erionite exposure arises when rocks or soils containing this mineral are disturbed, such as during construction or other activities that disrupt the ground. In the United States, erionite deposits have been identified in a number of western states, including North Dakota, Montana, and Wyoming, where they are typically present within volcanic ash layers and sedimentary formations.

The primary area of concern occurs in Carter County, Montana. Please refer to ***Figure 32: Erionite Risk.*** Bridger will implement safety measures to protect workers and the community in Carter County. Personnel in affected areas will be informed of risks and use appropriate PPE. Bridger will control dust by applying suppressants (water), reducing vehicle speeds, and promptly reclaiming disturbed areas. The company will coordinate with state and federal agencies to ensure regulatory compliance and prioritize health and safety where erionite may be present. Additionally, all sand, gravel, and other road/pad base materials would be acquired from commercial sources. Erionite containing material would not be used for any aspects of the project.

Implementing these measures helps minimize dust-related health risks and ensures compliance with environmental and safety regulations in construction zones.

7.13.3 Industrial Waste and Toxic Substances

No industrial waste or toxic substances will be stored on the ROW during construction. Any hazardous waste materials encountered will be disposed of at licensed waste disposal facilities. Hazardous wastes will not be disposed of any other way. If any toxic or hazardous waste materials are encountered during construction, the contractor will be required to stop work immediately and notify Bridger. Bridger will then determine how to safely and effectively mitigate the contamination with input from appropriate state and federal personnel.

Figure 31:Slope Instability

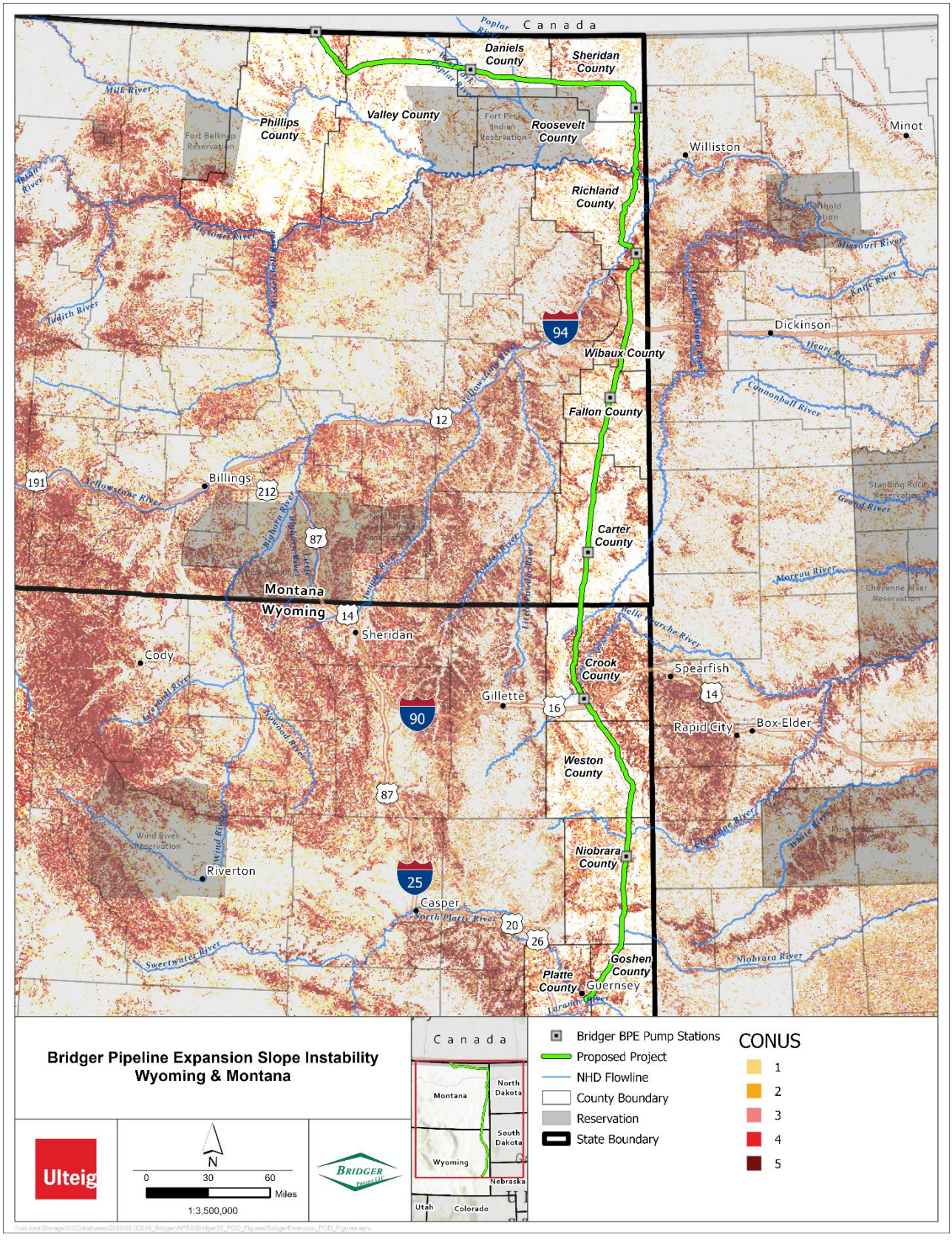
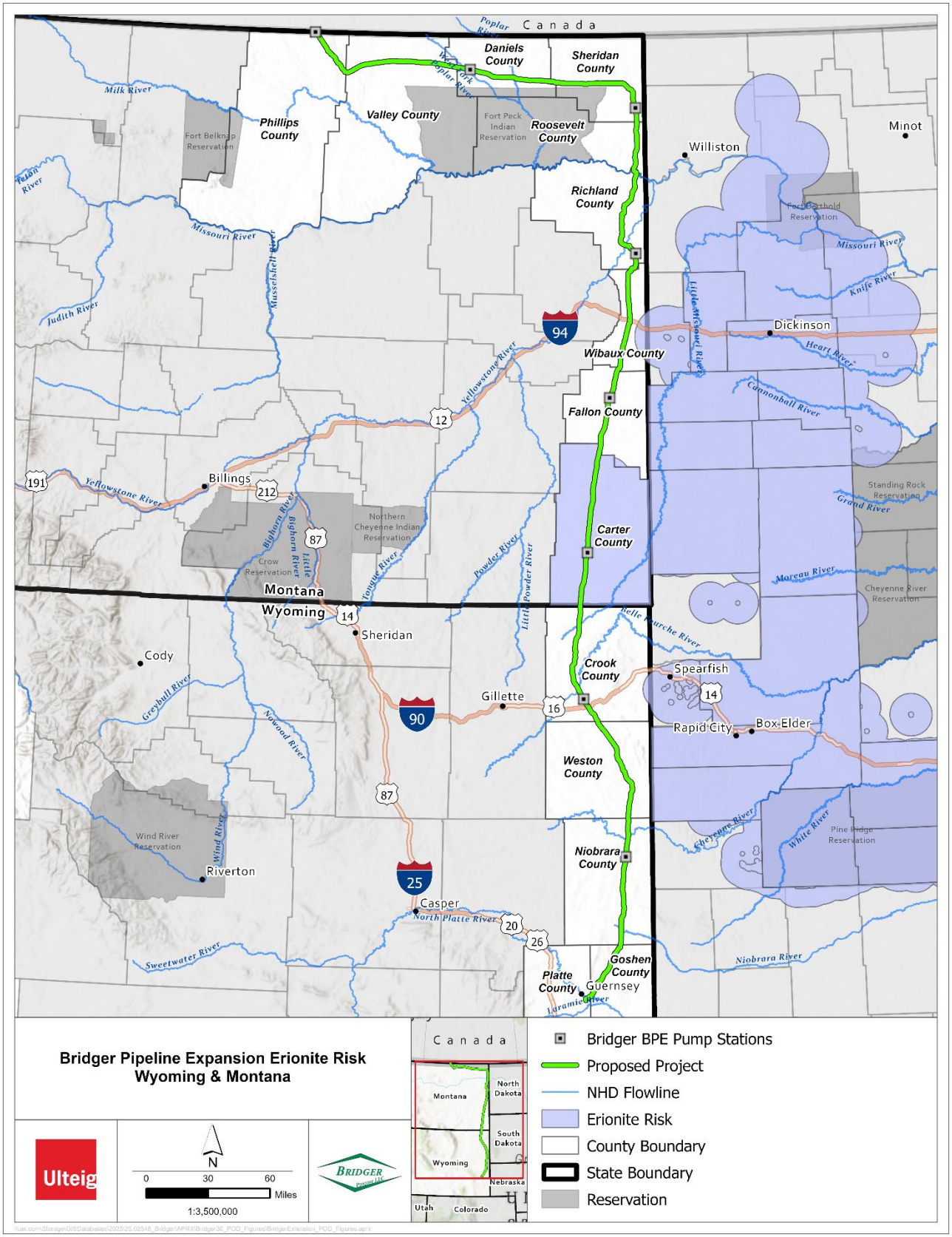


Figure 32: Erionite Risk



8 STABILIZATION AND RECLAMATION

Bridger will implement a comprehensive stabilization and reclamation program that begins at initial ground disturbance and continues through postconstruction monitoring, operations and maintenance, and termination rehabilitation. Measures are designed to prevent erosion, protect soil productivity, reestablish native vegetation, and meet agency-approved success criteria appropriate to the ecological site and land management objectives on BLM- and USFS-administered lands.

Final, site-specific prescriptions (e.g., seed mixes, erosion control product specifications, monitoring plots and intervals, acceptance thresholds) will be documented in the CMRP and refined during NEPA in coordination with the applicable Field Offices. Stabilization, reclamation, and associated monitoring on federal lands will comply with the appropriate BLM or USFS Resource Management Plans or NRCS technical guidance for soil/vegetation restoration on rangelands.

8.1 Soil Stripping, Replacement, and Stabilization

Prior to grading or trenching, qualified personnel will delineate salvage depths based on soil surveys and field verification, and adequate temporary or permanent protection will be installed for all significant above- or below-ground items (e.g., landmarks, pipelines, historical sites or markers, and powerlines) that could be damaged or destroyed during construction. Topsoil will be removed to its actual depth where practicable and stored separately from subsoil to preserve soil horizons and productivity. Stockpiles will be placed on stable upland sites away from drainages and protected with perimeter controls where needed to prevent sediment loss. Gaps between stockpiles shall coincide with breaks in strung pipe to facilitate natural drainage patterns and to allow the passage of livestock or wildlife. They will be stabilized with temporary cover and monitored for weed infestations. Subsoil spoils will be placed opposite topsoil and shaped to shed water, and trench breakers will be installed at appropriate intervals to prevent subsurface water movement.

Stabilization measures will begin during active construction rather than waiting until completion. Temporary erosion and sediment control measures (e.g., straw wattles, silt fences, or slope breakers) will be installed immediately following initial soil disturbance, be maintained regularly throughout construction, and reinstalled as necessary until permanent erosion control structures are in place or the ROW has been successfully restored. All temporary erosion and sediment controls must be inspected at the following frequencies:

- At least once daily in areas of active construction or equipment operation.
- Weekly in areas without active work.
- Within 24 hours after a significant rainfall event of 0.25 inches or greater.

Wet-weather protocols will be implemented to minimize soil disturbance during saturated conditions, including the use of timber mats, low-ground-pressure equipment, and ceasing work when soils are wet enough to form ruts greater than 4 inches. Once the pipeline is securely placed in the trench, backfilling operations will begin with the original native soil where appropriate—subsoil first, compacted, followed by topsoil—to ensure proper support, protect the coating, and maintain long-term stability. Topsoil must not be used for padding the pipe in the trench. Spoil replacement and compaction will be conducted using backhoe buckets and/or equipment tracks to minimize ditch line disturbance, Topsoil shall be replaced to pre-existing depths, up to a maximum of 12 inches, following subsoil preparation.

After backfilling, ROW surfaces will be de-compacted where necessary to restore infiltration. Where relieving compaction is necessary, compacted soils must be ripped or chiseled at a minimum of three passes (in cross patterns) to a suitable depth before replacing topsoil. Subsoil surfaces shall be graded until they are smooth and free of clumps to prevent mixing with topsoil. When decompacting on federal land, the BLM and/or USFS must be consulted if plowing under organic matter (including wood chips and manure) to decrease soil bulk density and improve soil structure.

Microtopography will be re-established to reduce runoff and improve seedling establishment. Permanent stabilization measures, such as slope breakers, water bars, and erosion control blankets, will be installed on steep or erosive slopes, and armored outlets will be used where concentrated flow occurs.

8.2 Seeding and Vegetation Establishment

Reclamation will include reseeding disturbed areas with certified, weed-free native seed mixes tailored to ecological site conditions, precipitation zones, and soil texture. Seed mixes will be approved by BLM and USFS and must include shrub components in sagebrush steppe habitats. Seeding will occur during optimal seasonal windows, either in late fall for dormant seeding or in spring when soil moisture and temperature are suitable. Drill seeding will be used where feasible, while broadcast or hydroseeding will be applied on rocky or steep terrain with appropriate adjustments to seeding rates. In some instances, sagebrush plugs may be used to re-establish certain sagebrush species. ROW spacing on drill seeders must not exceed six inches and seed depth shall be between 2 ½ and 3 times the diameter of the seed, which typically lies within a half inch of the surface. Drill seeders must be operated at a speed where the specified seeding rate and depth are maintained. When broadcast or hydro seeding, seed must be applied at twice the specified seeding rate; immediately after seeding, a harrow, cultipacker, or other equivalent must be used to incorporate seed to the required depth and firm the seedbed. Mulching or hydro-mulching may be applied to retain soil moisture and protect seedbeds and soil amendments will only be used with agency approval. Sagebrush plugs will typically be installed by hand or with small hand-held augers due to terrain, soil conditions, and access limitations, ensuring proper placement and root–soil contact. Weed prevention measures will include equipment cleaning, certified weed-free materials, and compliance with BLM's and USFS's Pesticide Use Proposal process for any herbicide applications.

8.3 Access Management and Road Reclamation

Access to the ROW will be restricted during reclamation to protect seedbeds and erosion control structures. Temporary fencing and signage will be installed, and escape ramps will be provided in open trenches within grazing areas. Temporary access roads will be obliterated and regraded to natural contours, de-compacted, and reseeded following the same standards as the ROW. This will involve erosion and sedimentation control measures such as erosion control blankets, mulch, trench breakers, or slope breakers; and a certified, native, weed-free seed mix. All temporary structures, mats, signage, and fencing associated with access roads will be limited to the approved ROW, TUP, and/or ATWS, and removed promptly following construction. Imported materials such as gravel or timber mats will be hauled off-site to an approved disposal facility unless otherwise directed. Permanent roads, where required, will be surfaced with visually compatible materials and stabilized to prevent erosion. Access to the ROW will generally be restricted during the active reclamation period to prevent damage to seedbeds, erosion control measures, and revegetation efforts; access may be allowed on a case-by-case basis under supervision and with approval from the landowner or managing agency.

Bridger will conduct annual monitoring of the ROW following construction and will continue monitoring until reclamation is deemed complete by the appropriate land-managing agency. Following this initial monitoring period, reclaimed areas will be subject to periodic monitoring for the life of the Project, as appropriate. In areas where sagebrush is being restored, monitoring will continue until reclamation success criteria and objectives are met. If success criteria are not met after two years, corrective actions shall be implemented promptly if deficiencies are identified, and all monitoring activities will be documented in accordance with Project requirements.

8.4 Reclamation Success Criteria and Monitoring

All disturbances would remain within the proposed ROW, TUP, and ATWS; therefore, reclamation would be limited to those areas. Bridger will adopt measurable success criteria based on BLM and USFS standards to ensure reclamation objectives are met. These criteria will include achieving vegetative cover comparable to adjacent undisturbed areas within three to five growing seasons, controlling noxious weeds, restoring soil stability with minimal erosion, and re-establishing hydrologic function. In sagebrush habitats, shrub establishment will be monitored for long-term recovery trends. Most monitoring will occur for at least three growing seasons; however, certain species, such as sagebrush, may take additional time for establishment and may result in longer duration monitoring efforts. Regardless of timeline, reclamation monitoring will continue until reclamation success criteria

and objectives are met. Monitoring will include photo points with associated direction of view and transects. If success criteria are not met, corrective actions such as reseeding, erosion control reinforcement, or weed treatments will be implemented. After successful reclamation standards have been achieved, Bridger will continue to monitor erosion and settling through aerial patrols and through any applicable agency reporting requirements. Detailed monitoring protocols and adaptive management strategies will be provided in the CMRP.

8.5 Operations and Termination Rehabilitation

During operations, Bridger will minimize disturbance to reclaimed areas by using existing access routes and avoiding travel during wet conditions. Weed management and spot repairs of erosion features will continue as needed. In the event of pipeline abandonment, Bridger will remove aboveground facilities, obliterate access roads, restore contours, and reseed disturbed areas following the same standards outlined above. Monitoring will continue until success criteria are achieved and accepted by the Authorized Officer. After successful reclamation standards have been achieved, Bridger will periodically monitor for erosion and settling through aerial patrols and through any applicable agency reporting requirements.

8.6 Reclamation Monitoring Plan

Bridger has developed a Reclamation Monitoring Plan, located in ***Appendix F***, to guide stabilization, revegetation, and long-term restoration of areas disturbed by the Project on BLM-administered and other federal lands. The plan is aligned with BLM and USFS reclamation guidance and is adaptable to site-specific conditions and federal land-management requirements. Reclamation on non-federal lands will follow applicable permits, the SWPPP, and landowner stipulations.

The Plan establishes agency-based reclamation success criteria, standardized monitoring methods, and reporting protocols to ensure compliance with federal standards and to support long-term ecological function. In Montana, success criteria follow the 2015 HiLine and Miles City Resource Management Plans; in Wyoming, the Plan incorporates BLM's statewide reclamation policy and the Newcastle Field Office guidance.

9 Operations & Maintenance

9.1 Guidelines

Following construction and reclamation activities, the Project will move into the operation and maintenance phase. The need for new or expanded access is yet to be determined. The current design includes approximately 63.8 miles of pipeline and one pump station being constructed on federal surface.

No removal or addition of pipe or pumps is planned as part of routine maintenance; necessary repairs will be performed as needed. The Project would include a 50-foot permanent ROW across BLM administered lands and a 100-foot permanent ROW across USFS administered lands. Should maintenance needs or extraordinary circumstances arise where additional area is required, a TUP will be requested from the appropriate federal agency.

9.2 Operation and Maintenance Activities

9.2.1 Normal Operations and Routine Maintenance

Once construction is complete and the pipeline is in service, the operator assumes responsibility for daily operations, ongoing inspections, and routine maintenance. These activities are carried out in accordance with established plans for integrity management, emergency response, and damage control. All procedures comply with current federal regulations, including those set by PHMSA (outlined in 49 CFR Part 195), covering design, installation, pressure testing, operation, welding, inspection and maintenance.

A centralized SCADA system, together with monitoring equipment installed along the pipeline, enables rapid detection of leaks or other operational issues and allows for automatic or remote closure of mainline valves when needed. The pipeline will be designed for internal cleaning and inspection using specialized in-line tools. Routine ground and aerial patrols are conducted to identify leaks, maintenance needs, and potential right-of-way encroachments; these patrols are generally performed biweekly in accordance with federal requirements. Aerial inspections are typically completed using fixed-wing aircraft operating above 300 feet. All inspection flights would utilize existing public or private airfields, and the Project would not construct any new runways for these activities.

Protective measures such as specialized coatings and cathodic protection systems are used to prevent corrosion, with rectifiers and deep-well anodes installed at intervals and inspected regularly. The operator is required to maintain and annually review all operations and maintenance manuals, ensure proper waste management, and provide annual emergency response training for staff, among other rigorous safety measures required by PHMSA. The pipeline is remotely monitored around the clock, and any deficiencies are addressed immediately to maintain safety and regulatory compliance.

Pipeline operations and maintenance will be conducted by trained and qualified personnel in accordance with PHMSA requirements. Staffing levels will be sufficient to support continuous monitoring, routine inspections, maintenance activities, and emergency response. Detailed staffing plans, including personnel assignments and operational coverage, will be finalized as part of project implementation and, where applicable, further documented during the NEPA process.

9.2.2 Abnormal Operations

Abnormal operating conditions (AOCs) refer to any deviation from normal pipeline operations that could indicate a potential safety hazard, environmental risk, or operational failure. Specific AOCs that may be encountered during operations include: pressure deviations, flow irregularities, temperature anomalies, leak detection alarms, equipment malfunctions, corrosion or structural damage, or presence of odor or visual indicators. These conditions require prompt recognition and response to prevent escalation.

All AOCs are investigated to identify issues and rectify them in accordance with DOT regulations. The type of abnormal condition acknowledged will dictate the actions taken along with determining if an emergency shutdown needs to be enacted. After checking pumps, piping and components for damage, relief valves, pressure transmitters, and all other safety shut down equipment must be tested prior to resuming operations. This equipment must be fully operational and observed after start-up to ensure system integrity is maintained. AOCs and repairs would be documented and filed.

9.2.3 SCADA and Leak Detection

A centralized SCADA system will be used to monitor and control pipeline operations in real time. The SCADA system operates 24 hours a day, seven days a week. Operators use SCADA to track pressure, flow rates, and valve positions across the pipeline network. The system provides timely alerts for abnormal conditions, such as pressure drops or flow discrepancies, which may indicate a release. SCADA operations will be conducted remotely from an existing facility.

Upon receiving an alarm, personnel initiate response procedures, including investigation of alarm cause and react accordingly. Shutdown procedures will be initiated for indications of potential leak or safety—related conditions; personnel will then notify field personnel and the Qualified Individual. SCADA data supports rapid decision—making during emergencies by providing accurate, time-stamped operational information. The system also logs historical data for post-incident analysis and regulatory reporting.

The SCADA system is regularly tested and maintained to ensure reliability and compliance with federal pipeline safety regulations.

Bridger also employs several non-SCADA methods to monitor its pipeline system and detect potential releases. Visual monitoring will occur at regular intervals, not to exceed three weeks apart, and may be completed as aerial patrols or on the ground surveys.

Field personnel perform routine ground inspections during maintenance activities, valve checks, and facility visits. These inspections allow crews to identify abnormal conditions (such as odors, dead vegetation, or soil discoloration) which may indicate a release.

In addition, Bridger relies on third-party reports from landowners, contractors, and the public. The company maintains a 24-hour emergency contact number to ensure prompt response to any external notifications of suspicious activity or potential leaks.

These monitoring practices complement SCADA-based surveillance and enhance the company's ability to detect and respond to pipeline incidents quickly and effectively.

9.2.4 Emergency Procedures

Bridger maintains a comprehensive Facility Response Plan (FRP) for its crude-oil pipelines and associated facilities in North Dakota, Montana, and Wyoming. Upon discovery of a release, field personnel immediately notify a designated Qualified Individual (QI), who assumes the role of Incident Commander. The QI assesses the situation, initiates containment measures, and mobilizes both in-house and contracted response resources as needed.

The company divides its pipeline system into response zones, each with pre-identified QIs and backup personnel available 24/7. Notification procedures ensure prompt communication with internal teams and external agencies, including the National Response Center and relevant state and local authorities. The response zones, once revised for the proposed project, will include the following:

- North Dakota: McKenzie, Golden Valley, Billings, Bowman, Dunn, Mountrail, and Stark Counties
- Montana: Sheridan, Roosevelt, Richland, Dawson, Prairie, Fallon, Carter, Powder River, Phillips, Valley, Daniels, and Wibaux Counties
- Wyoming: Crook, Campbell, Johnson, Converse, Niobrara, Goshen, Platte, and Weston Counties.

Bridger employs multiple methods for spill detection, as discussed above in **Section 9.2.3**. Upon confirmation of a spill, responders may close additional valves, construct containment dikes, and deploy spill response trailers equipped with booms, skimmers, and other recovery equipment. They prioritize containment of oil to prevent impacts to navigable waters and sensitive environments.

The response plan details the roles and responsibilities of the Incident Command System (ICS), ensuring clear command, control, and coordination during an incident. Bridger Pipeline contracts with multiple oil spill response organizations and maintains mutual aid agreements to guarantee rapid access to additional personnel and equipment. All response equipment is inventoried and maintained regularly, and the company conducts routine training and drills to ensure preparedness.

Bridger reviews and updates its response plan at least every five years, or sooner if operating conditions change. The company demonstrates its commitment to minimizing environmental harm by maintaining robust notification, containment, and recovery procedures, and by ensuring all personnel are trained and equipped to respond effectively to oil spills.

9.2.5 Unanticipated Discovery Procedure

The Project will include the development of Unanticipated Discovery Plans (UDPs) for both paleontological and cultural resources. These plans will outline clear procedures to be followed if previously unknown cultural materials, paleontological resources, or human remains are encountered during emergency response or any unplanned ground-disturbing activities. The Programmatic Agreement (PA) currently under development will further define requirements for unanticipated discovery, including compliance with the National Historic Preservation Act, Native American Graves Protection and Repatriation Act (NAGPRA), and other applicable federal and state regulations.

9.3 Air Quality

Some operational emissions will originate from the proposed pump stations along the pipeline route; however, all project-related facilities will be designed to comply with applicable federal and state air quality standards established under the Clean Air Act of 1970 and its subsequent amendments. In addition, the project will implement BMPs to further minimize potential emissions during operation. Bridger will also obtain all necessary air permits prior to operation, to ensure regulatory compliance.

One pump station and six MLV's are proposed to be constructed atop federal lands. The pipeline's pump stations will use electric motors and will not include emergency generators, thereby eliminating combustion-related emissions at those sites. Emissions from the remaining above ground facilities (MLV's, pipeline connections, and piping components) will be limited to minor fugitive releases. Fugitive emissions from these facilities during operation would be negligible and no impacts to federal lands are anticipated.

9.4 Noise

One pump station and six MLVs are proposed on federal lands. The MLVs are equipped with electric actuators that are used intermittently to open or close the valves and do not operate continuously during normal pipeline operations. As a result, the MLVs would not generate routine operational noise, and noise effects would be limited to brief, infrequent actuation or maintenance activities. The pump station would be powered by electric motors, which would generate limited operational noise. Given the use of electric equipment and the intermittent nature of maintenance activities, noise levels associated with pump station operation and maintenance are expected to be low and would result in minimal impacts to surrounding resources.

9.5 Geology Resources

Activities associated with operation and maintenance of the project would occur within previously disturbed areas; therefore, impacts to geology resources from operation and maintenance of the project are not anticipated.

9.6 Paleontological Resources

Activities associated with operation and maintenance of the project would occur within previously disturbed areas; therefore, impacts to paleontological resources from operation and maintenance of the project are not anticipated.

9.7 Water Resources

Operations of the Project are expected to have minimal effects on water resources due to Bridger's preventive safeguards, PHMSA-compliant spill response procedures, and routine inspections of major river crossings to identify issues such as exposed pipe, erosion, or debris buildup. Groundwater near sensitive areas may be monitored under regulatory requirements to confirm no adverse impacts, and any effects are anticipated to be minor and localized. Routine maintenance may cause temporary soil or vegetation disturbance, particularly near streams or wetlands, but these impacts are minimized through use of designated access routes, remote inspections, and BMPs. Overall, the combination of operational controls, regulatory compliance, and responsible field practices reduces the likelihood of long-term or widespread impacts to surface water or groundwater.

9.8 Vegetation

Bridger anticipates minimal impacts to vegetation during operations of the Project. Limited vehicle use on the permanent ROW for inspections and maintenance may cause small, localized disturbances, especially where access roads cross sensitive plant communities. Bridger will manage woody vegetation to maintain inspection visibility and will control noxious weeds using approved mechanical or chemical methods to prevent the spread of these species.

9.9 Wildlife

Bridger anticipates only minimal impacts to wildlife during the operational phase of the Project. All areas temporarily disturbed during construction will be restored to pre-disturbance landforms and desired plant communities; this includes objectives focused on sage-grouse habitat needs. Reclamation in disturbed areas will promote vegetation recovery consistent with original land use and ecological site conditions. Seed mixes will be approved by the Authorized Officer and will be applied based on ecological site characteristics, and wildlife considerations. Wildlife considerations, such as forage, cover, and seasonal needs will be incorporated where feasible. In areas requiring sagebrush stand restoration, locally adapted seed mixes will be utilized, and where feasible, sagebrush plugs will be planted to accelerate habitat recovery. As a result, most wildlife species are expected to return to previously disturbed areas once vegetation is reestablished. Operational activities, limited mainly to restricted-access roads and occasional inspection or maintenance trips, may cause brief, localized disturbances; however overall impacts are expected to remain minor.

9.10 Soil Resources

During operations, the pipeline will cause only limited soil disturbance, mainly from vehicle travel along established access roads and the ROW. These activities may create minor, temporary compaction or surface disturbance. The main soil-related risks are spills and erosion; in the event of a release, Bridger will implement its facility response plan (FRP) to contain and clean up contamination in accordance with federal and state requirements. Erosion control practices will also be used, especially on steep slopes or near waterbodies, to prevent sediment movement and protect soil resources.

9.11 Land Use

During operation, Bridger will maintain the permanent ROW on BLM and USFS lands to support inspection, maintenance, and access needs. No new above-ground facilities will be added on federally owned or managed lands, and the ROW will remain largely undeveloped and vegetated, resulting in minimal land use impacts. If any operational activity disturbs land or surface conditions, Bridger will restore the area in accordance with applicable land management requirements and best practices to maintain long-term land use compatibility.

9.12 Cultural Resources

Disturbances associated with operation and maintenance of the Project are anticipated to occur primarily within previously disturbed areas; therefore, impacts to cultural resources are generally not expected.

9.13 Human Health and Safety

Bridger will operate and maintain the pipeline in full compliance with PHMSA, USDOT, and OSHA regulations, using routine inspections, remote monitoring, and emergency preparedness measures to prevent and respond to incidents. Operational activities are designed to limit public exposure to hazards, and trained personnel follow strict safety protocols to protect workers and nearby communities. To further enhance safety and reduce the risk of accidental damage or contamination, Bridger secures MLVs with locks and installs fencing around all aboveground facilities to restrict access.

10 Termination and Rehabilitation

In the event of pipeline abandonment, Bridger will implement a comprehensive approach to termination and restoration in compliance with BLM regulations and requirements. All aboveground facilities and surface appurtenances will be removed, and associated sites will be reclaimed. Disturbed areas, including access roads, will be stabilized, re-vegetated, and restored to promote long-term landscape recovery.

Line pipe will generally be abandoned in place after purging and nitrogen blanketing, consistent with industry best practices and safety standards. This process ensures the pipeline is inert and eliminates the potential for water conveyance. In addition, sections of abandoned pipe will be sealed or plugged as necessary to prevent groundwater or surface water conveyance, consistent with BLM standards and industry best practices. Removal of shallow pipeline segments or connections will occur only if specifically required by the authorized officer (e.g., on BLM-administered lands). Grout or cement plugs are not proposed, as the pipeline will be fully purged, contain no hydrocarbon, and rendered non-functional.

Prior to abandonment, the pipeline will undergo a nitrogen purge and blanket, maintaining pressure below 50 pounds or as directed by the authorized officer, to ensure safety and environmental protection. Road reclamation will include obliteration of access roads associated with the pipeline, restoring the landscape to its original condition. All disturbed areas will be stabilized and re-vegetated to minimize long-term impacts.

11 REFERENCES

Cooley, Maurice E. *Artesian Pressures and Water Quality in Paleozoic Aquifers in the Ten Sleep Area of the Bighorn Basin, North-Central Wyoming*. Water-Supply Paper 2289. Washington, D.C.: U.S. Government Printing Office, 1986. https://pubs.usgs.gov/wsp/2289/report.pdf

Denson, N.M. *Geologic Map of the Lusk Area, Goshen and Niobrara Counties, Wyoming*. Open-File Report 74-349. Washington, D.C.: U.S. Geological Survey, 1974. Accessed October 22, 2025. https://doi.org/10.3133/ofr74349.

Enhanced Oil Recovery Institute. *Wyoming Pipeline Corridor Initiative (WPCI)*. Accessed October 7, 2025. https://www.eoriwyoming.org/co2-initiative/wyoming-pipeline-corridor-initiative.

Herrick, J., J. Van Zee, S. McCord, E. Courtright, J. Karl, L. Burkett. 2021. *Monitoring Manual for Grassland, Shrubland, and Savanna Ecosystems, Second Edition, Volume I: Core Methods* (BLM Technical Reference 173408 Vol. 1). USDAARS Jornada Experimental Range. Retrieved from https://jornada.nmsu.edu

Hinaman, Kurt. *Hydrogeologic Framework and Estimates of Ground-Water Volumes in Tertiary and Upper Cretaceous Hydrogeologic Units in the Powder River Basin, Wyoming*. Scientific Investigations Report 2005–5008. Reston, VA: U.S. Geological Survey, 2005. https://doi.org/10.3133/sir20055008.

Liquid Energy Pipeline Association. *Rules and Regulations for Pipelines*. Accessed October 7, 2025. https://pipeline101.org/topic/rules-and-regulations-for-pipelines/.

Lonn, Jeffrey D., and James W. Sears. *Surficial Geologic Map of the Bitterroot Valley, Montana*. Open File Report 441a, 441b, and 441c. Butte, MT: Montana Bureau of Mines and Geology, 2001. Revised December 12, 2001. https://mbmg.mtech.edu/pdf-open-files/MBMG441_text.pdf.

Lopez, D.A. *Geologic Map of the Bridger 30′×60′ Quadrangle, Montana*. Geologic Map GM-58. Butte, MT: Montana Bureau of Mines and Geology, 2000. Accessed October 22, 2025. https://ngmdb.usgs.gov/Prodesc/proddesc_32560.htm

Mapel, William J., and Charles L. Pillmore. *Geology of the Upton Quadrangle, Crook and Weston Counties, Wyoming*. Geological Survey Bulletin 1181-J. Washington, D.C.: U.S. Government Printing Office, 1964. Accessed October 22, 2025. https://pubs.usgs.gov/bul/1181j/report.pdf

Montana Bureau of Mines and Geology. "Geologic Mapping." *Montana Bureau of Mines and Geology*. Accessed October 22, 2025. https://mbmg.mtech.edu/MontanaGeology/GeologicMapping/currentmapping.asp#gsc.tab=0.

Montana Bureau of Mines and Geology. *Geology of Montana*. Butte, MT: Montana Bureau of Mines and Geology. Accessed October 22, 2025. https://mbmg.mtech.edu/pubs/GeologyOfMontana/#gsc.tab=0.

Montana Department of Environmental Quality. *Montana 2020 Water Quality Integrated Report*. Helena, MT: Montana Department of Environmental Quality, February 2021. https://deq.mt.gov/files/Water/WQPB/CWAIC/Reports/IRs/2020/MT_2020_IR_Final.pdf.

National Cancer Institute. "Erionite." *National Cancer Institute*, U.S. Department of Health and Human Services. Last modified December 5, 2022. Accessed October 22, 2025. https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/erionite.

North Dakota Department of Environmental Quality. "Erionite." *North Dakota Department of Environmental Quality*. Accessed October 22, 2025. https://deq.nd.gov/erionite/.

Richmond, Gerald M. *Surficial Deposits of the Bridger Wilderness, Wyoming*. Open-File Report 84-493. Denver, CO: U.S. Geological Survey, 1984. Accessed October 22, 2025. https://pubs.usgs.gov/of/1984/0493/report.pdf

Sheppard, Richard A. *Occurrences of Erionite in Sedimentary Rocks of the Western United States*. Open-File Report 96-18. Denver, CO: U.S. Geological Survey, 1996. https://pubs.usgs.gov/of/1996/0018/report.pdf.

St. John, Loren, and Dan Ogle. *Plant Guide: Ute Ladies'-Tresses (Spiranthes diluvialis)*. Aberdeen, ID: USDA NRCS Plant Materials Center, 2009. Accessed October 17, 2025. https://plants.usda.gov/DocumentLibrary/plantguide/pdf/pg_spdi6.pdf.

Taboga, Karl G., James E. Stafford, and James R. Rodgers. *Groundwater Level Recovery in the Sandstones of the Lower Tertiary Aquifer System of the Powder River Basin, Wyoming*. Report of Investigations 78. Laramie, WY: Wyoming State Geological Survey, 2022. https://pubs.usgs.gov/wsp/2289/report.pdf

Trimble, Donald E. *The Geologic Story of the Great Plains*. U.S. Geological Survey Bulletin 1493. Washington, D.C.: United States Government Printing Office, 1980. https://www.nps.gov/parkhistory/online_books/geology/publications/bul/1493/index.htm

Tyler, Jess. *Species Profile: Suckley's Cuckoo Bumble Bee (Bombus suckleyi)*. EM 9505. Oregon State University Extension Service, November 2020. Reviewed 2025. https://extension.oregonstate.edu/catalog/em-9505-species-profile-suckleys-cuckoo-bumble-bee.

U.S. Department of Agriculture. *Erosion*. Climate Hubs. Accessed October 27, 2025. https://www.climatehubs.usda.gov/climate-impacts/erosion.

U.S. Department of Agriculture, Natural Resources Conservation Service. *Ecological Site Descriptions (ESDs).* Washington, D.C.: USDA NRCS. Accessed October 27, 2025. https://www.nrcs.usda.gov/resources/guides-and-instructions/ecological-site-descriptions.

U.S. Department of Agriculture, Natural Resources Conservation Service. *Hydric Soils*. Accessed October 27, 2025. https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/soil/hydric-soils.

U.S. Department of Agriculture, Natural Resources Conservation Service. *Monarch Butterfly (Danaus plexippus plexippus) Conservation in Pennsylvania*. April 2020. Accessed October 17, 2025. https://www.fws.gov/sites/default/files/documents/Monarch%20Butterfly%20Field%20Version-Final.pdf.

U.S. Department of Agriculture, Natural Resources Conservation Service. (2025). *National range and pasture handbook* (Agricultural Handbook No. 296, Parts 500–508). https://www.nrcs.usda.gov/sites/default/files/2025-07/AgHandbook296-508-lowres.pdf

U.S. Department of Agriculture, Natural Resources Conservation Service. *Prime and Other Important Farmlands – Soil Data Access*. Accessed October 27, 2025. https://www.nrcs.usda.gov/publications/Legend%20and%20Prime%20Farmland%20-%20Query%20by%20Soil%20Survey%20Area.html.

U.S. Department of Agriculture, Natural Resources Conservation Service. *Soil Survey Geographic (SSURGO) Database.* Washington, D.C.: USDA NRCS. Accessed October 27, 2025. https://www.nrcs.usda.gov/resources/data-and-reports/ssurgo.

U.S. Department of Agriculture, Natural Resources Conservation Service. *Web Soil Survey*. Last modified July 31, 2019. Accessed October 27, 2025. https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.

U.S. Department of the Interior. *Alternative Arrangements for Compliance with the National Environmental Policy Act amid the National Energy Emergency*. April 23, 2025. https://www.doi.gov/sites/default/files/documents/2025-04/alternative-arrangements-nepa-during-national-energy-emergency-2025-04-23-signed_1.pdf.

U.S. Department of the Interior, Bureau of Land Management. *BLM National NEPA Register*. Last updated January 24, 2017. Accessed October 27, 2025. https://eplanning.blm.gov/eplanning-ui/project/70301/570.

U.S. Department of the Interior, Bureau of Land Management. *Final Programmatic Environmental Impact Statement (PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States.* Washington, D.C.: Bureau of Land Management, 2016. Accessed October 27, 2025. https://www.blm.gov/programs/natural-resources/vegetation/vegetation-treatments-program.

U.S. Department of the Interior, Bureau of Land Management. *Instruction Memorandum No. 2016-124: Potential Fossil Yield Classification (PFYC) System for Paleontological Resources on Public Lands*. Washington, D.C.: July 8, 2016. Accessed October 22, 2025. https://www.blm.gov/policy/im-2016-124.

U.S. Department of the Interior, Bureau of Land Management. *Manual 6840 – Special Status Species Management*. Washington, D.C. 2008. Accessed March 4, 2026. https://www.blm.gov/sites/default/files/uploads/mediacenter_blmpolicymanual6840.pdf

U.S. Department of the Interior, Bureau of Land Management. *Potential Fossil Yield Classification (PFYC) Geologic Formation – Montana*. Geospatial dataset. Updated August 22, 2025. Accessed October 27, 2025. https://ulteig.maps.arcgis.com/home/item.html?id=ea1cc274b7834c568de29928e1f5c1b7.

U.S. Department of the Interior, Bureau of Land Management. *Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development (The Gold Book).* 4th ed., revised 2007. Washington, D.C.: Bureau of Land Management. Accessed October 27, 2025. https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/operations-and-production/gold-book.

U.S. Department of Interior, Fish and Wildlife Service. *Bald and Golden Eagle Protection Act*. Last modified June 8, 1940. Accessed October 27, 2025. https://www.fws.gov/law/bald-and-golden-eagle-protection-act.

U.S. Department of Interior, Fish and Wildlife Service. *Endangered Species Act: Section 3 – Definitions*. Accessed October 27, 2025. https://www.fws.gov/laws/endangered-species-act/section-3.

U.S. Department of Interior, Fish and Wildlife Service. *Listing Status under the Endangered Species Act*. Information for Planning and Consultation (IPaC). Accessed October 27, 2025. https://ipac.ecosphere.fws.gov/status/list.

U.S. Department of Interior, Fish and Wildlife Service. *Major Pipelines (BLM) Policy: Interagency Activities and Environmental Quality Series*. Service Manual, 506 FW 3. December 31, 1996. https://www.fws.gov/policy-library/506fw3.

U.S. Department of Interior, Fish and Wildlife Service. *Migratory Bird Treaty Act of 1918*. Accessed October 27, 2025. https://www.fws.gov/law/migratory-bird-treaty-act-1918.

U.S. Department of Interior, Fish and Wildlife Service. *Northern Long-Eared Bat (Myotis septentrionalis)*. Environmental Conservation Online System (ECOS). Last updated August 5, 2024. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/9045.

U.S. Department of Interior, Fish and Wildlife Service. *Pallid Sturgeon (Scaphirhynchus albus)*. Environmental Conservation Online System (ECOS). Last updated February 10, 2025. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/7162.

U.S. Department of Interior, Fish and Wildlife Service. *Piping Plover (Charadrius melodus)*. Environmental Conservation Online System (ECOS). Last updated June 6, 2025. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/6039.

U.S. Department of Interior, Fish and Wildlife Service. *Piping Plover (Charadrius melodus)*. Environmental Conservation Online System (ECOS). Accessed October 27, 2025. https://www.fws.gov/species/piping-plover-charadrius-melodus.

U.S. Department of Interior, Fish and Wildlife Service. *Platanthera praeclara (Western Prairie Fringed Orchid) Recovery Plan*. Fort Snelling, MN: U.S. Fish and Wildlife Service, 1996. https://ecos.fws.gov/docs/recovery_plan/960930a.pdf.

U.S. Department of Interior, Fish and Wildlife Service. *Preble's Meadow Jumping Mouse (Zapus hudsonius preblei)*. Environmental Conservation Online System (ECOS). Last updated January 31, 2022. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/4090.

U.S. Department of Interior, Fish and Wildlife Service. Regal Fritillary (*Speyeria idalia*) Conservation Profile. May 2020. Accessed October 17, 2025. https://www.fws.gov/sites/default/files/documents/Regal%20Fritillary%20Field%20Version-%20Final_0.pdf.

U.S. Department of Interior, Fish and Wildlife Service. Regal Fritillary *(Speyeria idalia)*. Environmental Conservation Online System (ECOS). Accessed October 17, 2025. https://www.fws.gov/species/regal-fritillary-speyeria-idalia.

U.S. Department of Interior, Fish & Wildlife Service. "Threats to Birds: Habitat Impacts." *U.S. Fish & Wildlife Service*. Accessed October 17, 2025. https://www.fws.gov/story/threats-birds-habitat-impacts.

U.S. Department of Interior, Fish and Wildlife Service. *Tricolored Bat (Perimyotis subflavus)*. Environmental Conservation Online System (ECOS). Last updated July 25, 2024. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/10515.

U.S. Department of Interior, Fish & Wildlife Service. "Ute Ladies'-Tresses." *U.S. Fish & Wildlife Service*. Accessed October 17, 2025. https://www.fws.gov/species/ute-ladies-tresses-spiranthes-diluvialis.

U.S. Department of Interior, Fish & Wildlife Service. "Western Prairie Fringed Orchid (*Platanthera praeclara*)." *U.S. Fish & Wildlife Service*. Accessed October 17, 2025. https://www.fws.gov/species/western-prairie-fringed-orchid-platanthera-praeclara.

U.S. Department of Interior, Fish and Wildlife Service. *Whooping Crane (Grus americana)*. Environmental Conservation Online System (ECOS). Last updated October 15, 2024. Accessed October 27, 2025. https://ecos.fws.gov/ecp/species/758.

U.S. Department of Interior, Geological Survey. *Hydrologic Atlas 730*. U.S. Department of the Interior. Last modified November 30, 2016. Accessed October 22, 2025. https://pubsdata.usgs.gov/pubs/ha/ha730/.

U.S. Government Publishing Office. *49 U.S. Code § 60102 – Purpose and General Authority*. United States Code, Title 49 – Transportation, 2020 Edition. Accessed October 7, 2025. https://www.govinfo.gov/content/pkg/USCODE-2020-title49/html/USCODE-2020-title49-subtitleVIII-chap601-sec60102.htm.

Wyoming Department of Environmental Quality. *Water & Wastewater Permitting*. Accessed October 7, 2025. https://deq.wyoming.gov/water-quality/water-wastewater/permitting/.

Wyoming State Geological Survey. "Geologic Map of Wyoming Data." *Wyoming State Geological Survey*. Accessed October 22, 2025. https://main.wsgs.wyo.gov/gis/gis-geology.

Wyoming State Geological Survey. *Wyoming State Geological Survey*. Accessed October 22, 2025. https://www.wsgs.wyo.gov.

Xerces Society for Invertebrate Conservation. *Suckley's Cuckoo Bumble Bee (Bombus suckleyi)*. Bumble Bee Atlas. Accessed October 17, 2025. https://www.bumblebeeatlas.org/pages/bombus-suckleyi.

Appendix A Legal Land Description Table

Appendix B Ownership and Administrative Summary by County

Appendix C Construction, Mitigation, and Reclamation Plan

Appendix D Wildfire Prevention and Suppression Plan

Appendix E Noxious Weed Management Plan

Appendix F Reclamation Monitoring Plan

Appendix G Federal, State, and Local Permit Matrix

Appendix H Temporary Access Road