



February 17, 2020

US Fish & Wildlife Service  
3425 Miriam Avenue  
Bismarck, ND 58501



U.S. FISH AND WILDLIFE SERVICE  
ND Ecological Service Field Office  
Project as described is not expected to have significant impact on fish and wildlife resources. Contact this office if changes to the project are made or new information becomes available.

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Date

[Signature]  
N.D. Ecological Service Office Supervisor

**SUBJECT: Proposed Gas Plant  
OE2 North LLC, Bill Sanderson Gas Processing Plant Project**

To Whom it May Concern,

OE2 North LLC (OE2) proposes to construct the Bill Sanderson Gas Processing Plant Project (Project or Plant) that will consist of a processing plant permitted under the North Dakota Public Service Commission (PSC) Certificate of Site Compatibility. The processing capacity of the Plant will be up to 250 million standard cubic feet per day (MMscfd), which exceeds the PSC's processing capacity criteria and thus, defines the Plant as a gas or liquid energy conversion facility under North Dakota Century Code (N.D.C.C.) Section 49-22.1-01(6).

Upon completion of the project, OE2 will own and operate a gas gathering and processing system that will process raw, wellhead gas from wells in Williams and additional counties into marketable natural gas and natural gas liquids (NGLs). The project will feed products into third-party interstate natural gas and NGL pipelines that service the Rocky Mountains, Midwest, and Gulf regions. The project is both economically and environmentally impactful for the state, as the project will not only add valuable midstream service for exploration and production companies in the region, but also significantly reduce flaring and associated volatile organic compound (VOC) emissions in the state. At full capacity, the plant is expected to reduce state-wide VOC emissions by approximately 25,000 tons per year.

The Project will be located approximately 15 miles West of Williston, North Dakota, in Section 27, Township 154 North, Range 104 West, Williams County, North Dakota. Please see the attached Project Overview Map for the project location and details.

OE2 contracted Grouse Mountain Environmental Consultants (GMEC) to conduct a desktop analyses for natural resources (i.e. wildlife, cultural, and Waters of the United States [WOTUS]) potentially impacted by the construction of the Plant. GMEC also conducted an on-site field assessment on January 29, 2020 to supplement findings from the offsite desktop assessment. The results of the analysis of threatened and endangered species is summarized in the following paragraphs.

GMEC used the USFWS's Information for Planning and Consultation (IPaC) to assess potential impacts to threatened and endangered (T&E) species within the Project Area. IPaC identifies any designated critical habitat within the area as well as any species potentially affected based on the location of their historical ranges and areas of influence (AOI). If a species is identified as potentially affected but no critical habitat is present, it does not necessarily imply suitable habitats associated with that species are present within the Project Area. The IPaC pulled for this project lists six species as potentially affected by activities within the Project Area, these species include: Northern long-eared bat (*Myotis septentrionalis*), Least Tern (*Sterna antillarum*), Piping Plover

(*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), Whooping Crane (*Grus americana*), and Pallid sturgeon (*Scaphirhynchus albus*).

The Northern long-eared bat is primarily associated with mature forests with large decaying or partially dead trees during the breeding season and caves or mines during winter hibernation. The Least Tern nests near water, using primarily riverine sandbars or salt flats from low tide during the breeding season in the interior U.S. The majority of Piping Plovers in the Great Plains use shorelines along small, alkaline lakes. Suitable habitat includes large beaches with highly clumped vegetation that provides low overall cover. Red Knots require elevated ridges and slopes near wetlands and lakes where food is abundant during the breeding season and winter in coastal areas, such as tidal flats, estuaries, or bays. Pallid sturgeon are large river obligates that require year-round water flows. Whooping Cranes nest in dense emergent vegetation around shallow ponds, wet prairies, or freshwater marshes. During spring and fall migration, the Aransas/Wood Buffalo population of Whooping Cranes use marshes, salt flats, lagoons, barrier islands, palustrine wetlands as well as stubble/grain fields and cropland adjacent to or near wetland features. During the wetland survey conducted January 29, 2020, GMEC biologists assessed potential suitable habitat for relevant T&E species within the Project Area.

No currently defined critical habitats are located within the Project Area and no birds of conservation concern are expected. Further, no suitable habitats for Northern long-eared bat, Least Tern, Piping Plover, Red Knot, or Pallid sturgeon were identified within the Project Area. The Project is currently located within the area in which 85 percent of migratory sightings of Whooping Crane are recorded for the Aransas/Wood Buffalo population; however, the Plant Site is located outside of the central flyway and in an area where no e-bird sightings of Whooping Cranes have been reported during migration. While the additional parcels of interest located within sections 34 and 35 T154N-R104W currently encompass cropland, no critical stopover habitats are designated nearby. Field surveys indicated that small wetlands may be present in the northern portion of the parcel boundary, within 1 kilometer of the cropland. However, the use of the Project Area by Whooping Cranes as a stopover during migration is unlikely.

On behalf of OE2, Kleinfelder is seeking comments regarding the referenced project in compliance with the North Dakota Energy Conversion and Transmission Facility Siting Act. We request comments be submitted by March 17, 2020. Please call me at 303-297-5791 if you have any questions.

Sincerely,

**KLEINFELDER**



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Project Manager III

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