

Plan of Development – Revision 1

Anticline Electrification 25 kV Distribution
Lines Project – Segment 10
Sublette County, Wyoming

for

Rocky Mountain Power

May 18, 2012



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Anticline Electrification 25 kV
Distribution Lines Project – Segment 10
Sublette County, Wyoming**

File No. 1456-054-07

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INTRODUCTION

Rocky Mountain Power (RMP), a division of PacifiCorp, has applied for a right-of-way (ROW) grant for the construction, operation, and maintenance of a new 25 kilovolt (kV) distribution line to be located in Township 30 North, Range 108 West, Sections 25 and 26 in Sublette County, Wyoming (Figure 1). The proposed three-phase single circuit 25 kV distribution line will extend from the primary backbone (Segment 4) approximately 0.6 miles west to the Ultra SWD facility. The distribution line will require a permanent ROW 40 feet in width. Permanent ROW for the distribution line is approximately 3.0 acres located on US Bureau of Land Management (BLM) lands. The temporary ROW needed for construction will be 100 feet in width. The temporary use area for construction on BLM lands will be approximately 8.2 acres in size, see Table 1.

TABLE 1. PERMANENT ROW AND TEMPORARY USE DISTURBANCE ESTIMATES FOR BLM LANDS

Activity Type	Estimated Area ¹
Permanent ROW (40 feet)	3.0 acres
Additional Temporary Use Permit (+60 feet)	4.5 acres
Two In-Line Pulling and Tensioning Sites (+100 feet x 150 feet)	0.7 acres
Total Project Area:	8.2 acres

Note:

¹. Area estimates based on preliminary design information and will be subject to change.

This Plan of Development (POD) has been prepared to assist the BLM Pinedale Field Office (PFO) in their review of the potential environmental impacts of the project. It introduces the purpose and need of the project, describes the material, equipment, work force, and construction techniques necessary to complete the project, and contains a description of the environment through which the proposed distribution line will traverse. This POD also proposes measures RMP and/or its designated contractor will take to protect biological and cultural resources and to minimize disturbance to natural resources during construction, operation, and maintenance of the project.

Purpose and Need for the Proposed Action

The proposed distribution line will allow local oil and gas operators to convert from internal combustion generators and motors to electric energy to power equipment. Sublette County currently experiences high levels of ozone accumulation which trigger ozone warnings for the residents of the greater Pinedale, Wyoming region. By providing electric power for local oil and gas operations this project will reduce the amount of ozone forming chemicals that enter the local environment and improve air quality in the region.

Additionally, the demand for electricity has increased dramatically in Sublette County, Wyoming during the last several years due to an increase in natural gas and oil production and transportation as well as secondary support services. RMP has received requests from multiple oil and gas companies for 25 kV distribution service. The purpose of the Anticline Electrification 25 kV Distribution Lines Project is to provide electrical service to customers in the Anticline Oil and Gas Development Area.

Authorizations, Permits, Reviews and Approvals

The proposed project will be designed to conform to the current BLM Resource Management Plan for the Pinedale, Wyoming area, as well as to other related federal, state and local regulations and plans. Table 2 lists the federal, state and local agencies' approvals, reviews and permitting requirements for the distribution line.

TABLE 2. AUTHORIZATIONS, PERMITS, REVIEW, AND APPROVALS

Issuing Agency	Nature of Permit/Approval	Authority
U.S. Army Corps of Engineers	Section 404 permits regarding placement of dredged or fill materials in waters and adjacent wetlands	Section 404 of the Clean Water Act of 1972 (40 CFR 122–123, 230)
U.S. Fish and Wildlife Service	Biological Assessment -coordination, consultation, and impact review on federally listed threatened and endangered species and other federally protected species	Fish and Wildlife Coordination Act (16 USC Sec. 661 et seq.); Section 7 of the Endangered Species Act of 1973, as amended (16 USC et seq.); Bald and Golden Eagle Protection Act, as amended (16 USC 668-668dd); Migratory Bird Treaty Act (16 USC 704)
U.S. Environmental Protection Agency	Spill prevention, control, and countermeasure plans	40 CFR 112
	Regulation of hazardous waste treatment, storage, and/or disposal	Resource Conservation and Recovery Act (42 USC 6901)
Wyoming Department of Environmental Quality (WDEQ) - Water Quality Division	National Pollutant Discharge Elimination System (NPDES) permits for discharging waste water and storm water runoff	Wyoming Environmental Quality Act (Wyoming Statutes [W.S.] 35-11-301 through 35-11-311); WDEQ Rules and Regulations, Chapter 18; Wyoming Environmental Quality Act (W.S. 35-11-301 through 35-11-311); Section 405 of the Clean Water Act (40 CFR 122124)
Wyoming Department of Transportation	Permits for oversize, over length, and overweight loads	Chapters 17 and 20 of the Wyoming Highway Department Rules and Regulations
	Utility and access permits for highway power line crossing and highway access construction	WYDOT Rules and Regulations, Utility Accommodations Section; Chapter 6: Overhead Power and Communication Facilities
Wyoming Department of Employment - Workers Safety and Compensation Division	Rules and regulations governing the health and safety of employees and employers of oil and gas drilling and servicing	W.S. 27-11-105
Wyoming State Historic Preservation Office	Cultural resource protection, programmatic agreements, consultation	Section 106 of the NHPA and Advisory Council Regulations (36 CFR 800)
Wyoming State Lands and Investments	ROW and easements on state lands	W.S. 36-9-118

Issuing Agency	Nature of Permit/Approval	Authority
Sublette County Planning and Zoning Department	Power line crossing of County Road ROW	Road Standards for Sublette County

Schedule

Construction of the 25 kV distribution line is scheduled to commence in the summer of 2012, dependent on wildlife stipulations, and is planned to be completed by January 31, 2013. Distribution line construction may be subject to BLM timing stipulations for raptor nesting and greater sage-grouse leks (refer to Table 4).

PROJECT DESCRIPTION AND DESIGN

The proposed Project consists of electrical infrastructure development of a new single circuit 25 kV distribution line from the primary backbone (Segment 4) west to the Ultra SWD facility. The overhead portion of the new distribution line, approximately 0.3 miles, will be constructed using single-wood pole structures between 45 and 55 feet in height with a 230-foot ruling span length. If ground clearance of 30 feet is required at pipeline crossings, then taller structures will be required. For span lengths over 250 feet, special design provisions will be required.

Overhead Line Requirements

Distribution lines would be buried where possible. Lines designated as backbone power supply would remain overhead in order to maintain voltage and reliability standards as required by Regulation and Rocky Mountain Power. Distribution tap lines would be buried except in locations where the lines are required to cross the designated pipeline corridors. Underground distribution lines would have special operational problems due to capacitance in addition to reduced flexibility of expansion, and maintenance concerns with the amount of underground pipelines in the area.

Distribution Line Design

The design, construction, operation and maintenance of the 25 kV distribution line will meet or exceed the requirements of the National Electrical Safety Code (NESC), U.S. Department of Labor Occupational Safety and Health Standards, and RMP's requirements for safety and protection of landowners and their property. The line will also be built to RMP avian-safe design specifications following Avian Power Line Interaction Committee (APLIC) recommendations.

Specific supplemental documentation providing specification for the distribution line including engineering drawings, construction guidelines, construction stipulations, plan and profile drawings, and technical specifications are under development and will be provided to BLM once completed.

Structures

The new distribution poles will consist of wood pole structures spaced between 200 and 300 feet apart and approximately 55 feet in height, depending on topography. The line will consist of single wood pole structures with post side-mount insulators. Structures located at angles may require down guys and anchors. Anchors will be set between 30 and 50 feet out from the base of the angle structures to the outside of the angles.

Overhead Conductors

The 25 kV conductors will be All Aluminum Alloy Conductor (AAAC) 477 non-specular (non-reflective). The line will be three-phase, single-circuit overhead 25 kV from the primary backbone to the west approximately 0.3 miles. This portion of the line will include three conductors and one neutral, totaling four conductors.

Minimum conductor height above ground will be based on NESC and RMP's current distribution standards. The line will maintain a 30-foot conductor clearance over pipeline crossings, where required by BLM. Structures taller than 50 feet in height may be required to meet clearance requirements.

Insulators and Associated Hardware

The proposed design will have polymer post-mounted insulators for each phase that minimize perching by raptors and maintain the 60-inch (horizontal) and 40-inch (vertical) raptor-safe minimum clearance between any two phases or phase to ground (consistent with the APLIC recommendations). Specific length of insulator strings will be determined in the final line design.

Buried Conductor

Buried conductor will extend from the end of the overhead line approximately 0.3 miles. The conductor will be 4/0 underground rural distribution (URD) cable. The three phase line will include three conductors installed in a 6-inch PVC conduit. The depth of the conductor will be 36 inches minimum. Conductor will be installed in 900' lengths as limited by the maximum pull length.

Pull Boxes/Vaults

Pull boxes will be approximately 66 inches in length, 22 inches in width and 36 inches tall with a pre-cast concrete vault base installed below ground. Pull boxes will be installed every 900 feet as limited by the maximum pull length.

Dip Structure

One new distribution pole will be required to tap from the primary backbone and dip underground. This structure will be approximately 50 feet in height and be located within approximately 30 feet of the end of the overhead line.

Right-of-Way**Right-of-Way Application**

Permanent and temporary use permit applications have been submitted to BLM PFO (ROW Grant: WY-179478 and Temporary Use Permit: WY-179479 TUP).

Lands Information

The 25 kV distribution line will be constructed within Township 30 North, Range 108 West, Sections 25 and 26 of Sublette County, Wyoming. The distribution line will be located entirely on public lands managed by BLM.

Acquisition

ROW for the distribution line on non-federal lands will be obtained by RMP or their designated contractor in perpetual easements or ownership in the name of RMP.

Construction**Alignment and ROW Staking**

The proposed 25 kV structure locations will be staked by a professional land surveyor using Geographic Information System (GIS) or georeferenced AutoCAD files provided by project engineers. The surveyors are provided with GIS shapefiles of driving avoidance areas by BLM to minimize the possibility of accidental disturbance to cultural and/or paleontological sites and other resources. Prior to construction, the surveyor shall stake temporary use areas. The environmental compliance (EC) monitor shall mark significant biological, cultural sites and paleontological locales (refer to Monitoring and Marking section) identified by BLM, if present. Sensitive resources will be marked as general avoidance areas without distinguishing between biological and cultural sites to protect these resources.

Access Roads

Existing access roads and two-tracks will be used to gain access to the ROW and to move construction equipment to the area. For structures not immediately adjacent to existing roads, the contractor will travel overland within the authorized ROW from the nearest existing access road. Saturated soils will play into consideration at all times and the 4 inch rut rule will be in place during all phases of construction. Where this is not practicable, proposed off-ROW construction access routes will be identified during the NEPA process and included in a future version of this POD. Resource survey data for cultural and biological resources will be utilized to locate sensitive areas and access routes will avoid these areas. Emphasis will be placed on traveling on existing access roads and two-tracks instead of overland, whenever practicable.

Overland travel routes may require minor surface grading in areas with excessively undulating terrain to accommodate site access by equipment and transport of power poles and construction material. Contractor should be aware of culturally sensitive areas and proper contacts should be made to our BLM archeologist if a question arises. If grading is necessary, areas will be coordinated with BLM and grading will not commence without BLM approval. When grading associated with access takes place, the top six to ten inches of soil will be removed/salvaged and stockpiled separately from other stockpiles. This topsoil will be replaced upon completion of construction activities as close to preconstruction contours as possible and the areas will be stabilized and reseeded as necessary. Vegetation that is removed during grading or clearing activities will be salvaged as well and spread over the replaced topsoil to aid in reclamation. When blading is not required but removal of vegetation is needed, vegetation will be mowed (or similar process), leaving the root mass intact. The removed vegetation will be salvaged and spread over the area during reclamation. All existing roads will be left in a condition equal to or better than their condition prior to the construction of the distribution line. Overland access routes utilized during construction will be reclaimed and reseeded upon completion of construction activities.

The underground portion of the line will require the temporary use of a single access road located adjacent to the centerline of the underground alignment for the entire route.

Structure Sites

At structure sites, relatively level areas are needed to facilitate the safe operation of equipment, such as construction cranes and bucket trucks. These areas will be approximately 150 feet long by 100 feet wide. Grading will be avoided wherever possible and will only be needed on excessively undulating or steep terrain. If grading is necessary, BLM will be informed and the activities will be coordinated with the environmental compliance monitor in order to minimize disturbance. Grading will not commence without BLM approval. When grading is required to accommodate safe operation of equipment, vegetation and the top six to ten inches of soil will be bladed and stockpiled as described above in the Access Roads section. When blading is not required but removal of vegetation is required for a safe work site, vegetation will be mowed (or similar process), leaving the root mass intact. The removed vegetation will be salvaged and spread over the area during reclamation. After line construction, disturbed areas will be graded (as needed) to blend as closely as possible with the natural contours, the upper six to ten inches of soil and vegetative material will be replaced and the areas will be reseeded as necessary. Holes drilled at structure sites and all potential power pole holes or excavation will not be left uncovered or unguarded for the potential of livestock, wildlife or public to fall into holes. Holes should be covered with a structure or properly fenced and marked with wire, t-post, and barricades.

Pipeline Crossings

Pipeline crossings pose important safety concerns for construction of the proposed distribution line. The distribution line will be designed to prevent structures from being located within pipeline ROWs and will include a NESC compliant conductor clearance over pipelines as required by BLM. The underground distribution line will be designed to meet the requirements of BLM and oil and gas operators. Additionally, equipment will not be set-up over pipelines during construction of the distribution line. If staging construction equipment over a pipeline is unavoidable, the Construction Contractor may not do so without coordinating this with the pipeline operator and receiving approval from the pipeline operator. In addition to one-call locates, potholing to determine actual pipeline locations will be conducted as needed prior to construction at pipeline crossings.

Road Crossings

Road crossings also pose important safety concerns for construction of the proposed distribution line. Distribution line construction will generally be completed without blocking roads. If blocking a BLM managed road is unavoidable, coordination with BLM will be required prior to conducting the activity. BLM coordination, or the appropriate entity for other public/existing roads, will include identification of flaggers, shoe-fly roads and/or detours.

Pole Installation

The poles, cross arms, and other required material will be transported through the ROW to each structure location. In sequence, the appropriate materials are connected to the pole, the hole is augured and the poles are lifted up by a crane and set into the hole. Once the poles are in place, the conductor (wire) is strung and ample tension is applied to meet engineering standards. Upon completion of this task, graded areas will be restored to original contours and reseeded. The number of workers and types of equipment required to construct the proposed distribution line are shown in Table 3 on the following page.

TABLE 3. DISTRIBUTION LINE CONSTRUCTION EQUIPMENT AND PERSONNEL

Estimated Personnel and Equipment Required			
Activity/Crew	People	Type of Equipment	Quantity
Survey	3	Pickup truck	2
Transporting Equipment Along the ROW and Assembling Hardware on Poles, Conduit and Vaults	6*	Tracked backhoe or blade	1
		Semi truck with flatbed trailer	1
		Pickup truck	1
		Water truck (for dust control near highways)	1
		Crane	1
Clearing ROW	2*	Pickup truck	1
		Motor grader	1
Trenching Alignment	2*	Pickup truck	1
		Back hoe	1
Installing Buried Conductor	3*	Pickup truck	1
		Backhoe	1
Setting Dip Structure	5*	Pickup truck	1
		Bucket truck	2
		Truck mounted auger	1
Setting Poles	6*	Pickup truck	2
		Crane	1
		Truck mounted auger	1
Installing Conductors, Pulling and Tensioning	10*	Wire reel trailers	2
		Diesel tractors	2
		Helicopter or Crane	1
		Pickup trucks	2
		Drum puller	1
		Double-wheeled tensioner	1
		Carry all	1
		Static trailer	1
Sagging, Clipping and Dead-ending	6*	High ranger	1
		Pickup trucks	2
Reclamation	4*	Landscaped tractor w/ harrow and drill seeder	1
		ATV w/ broadcast seeder	1
		Pickup truck	1
Total Personnel Required	47		

Notes

*Electrical contractor will utilize the same personnel for multiple activities

Conductor Installation (Overhead)

Insulators, hardware and stringing sheaves will be delivered to each structure site. The structure will then be rigged with insulator strings and stringing sheaves at each conductor position. Stringing of the conductor will be performed by on the ground method. To accomplish this, ropes will be hung from the stringing sheaves and a pilot line will then be strung along the ground and attached to each rope at the structure location. The pilot line will then be pulled up to the sheave and pulled through until all sheaves within a pull section have the pilot line installed. At that time, the pilot line will be attached to the pulling line which will be pulled back through before attaching to the conductor for the final pull through. Conductor will be strung using powered pulling equipment at one end and powered braking or tensioning equipment at the other end.

Pulling and Tensioning Sites (Overhead)

Pulling and tensioning sites will be located at the beginning and end of the overhead portion of the alignment. The work area for pulling and tensioning will be approximately 100 feet wide by 250 feet in-line beyond the structure. Two in-line pulling and tensioning sites will be located along the alignment extending beyond the beginning and end of the temporary use corridor.

Final locations and quantities of pulling and tensioning sites will be determined by the construction contractor and approved by the BLM Authorized Officer. As with structure sites, if grading is necessary, areas will be coordinated with BLM and grading will not commence without BLM approval. Vegetation and the top six to ten inches of soil will be bladed and stockpiled separately from other spoils. When blading is not required but removal of vegetation is required for a safe work site, vegetation will be mowed (or similar process), leaving the root mass intact. The removed vegetation will be salvaged and spread over the area during reclamation. After line construction, areas will be graded to blend as near as possible with the natural contours, the top six to ten inches of soil and vegetative material will be replaced and the disturbed areas will be revegetated where necessary.

Clearing and Grading (Underground)

Prior to the start of construction, the limits of the construction ROW will be clearly staked. After staking, the ROW for the underground distribution line will be cleared of vegetation. A motor grader with a blade will be used to remove vegetation, such as sagebrush, within the minimum area needed to provide a safe and level working area. The cleared area is expected to be between 15 and 20 feet in width. After vegetation clearing, a minimum of 6 inches of topsoil will be stripped from the ditch line and any other area that needs to be graded and stockpiled on the non-working side of the construction ROW. Topsoil will not be mixed with ditch spoil or other excavated material. Grading will be conducted as necessary to allow the safe movement of equipment and personnel along the ROW. Grading usually requires cutting or filling and may include ripping rock close to the surface. Equipment traffic across/through drainage channels will be limited to sloping drainage sides or vertical banks of less than 2 feet. To the extent practicable, drainage crossings will be aligned perpendicular to the stream channel.

Trenching (Underground)

After grading is complete, a track hoe will be used to dig a trench up to two-feet-wide, stockpiling the dirt beside the ditch. In rocky areas or areas where the distribution line changes direction, an

excavator (trackhoe) will be used. The ditch will be excavated to a minimum depth of 48 inches to allow for 36 inches of cover over the buried conductor.

Hauling and Stringing (Underground)

Once grading is complete, all construction materials will be hauled to construction sites by truck. Conduit will be strung along the ROW in a manner to cause the least interference with the normal use of the land crossed by the ROW. Pull boxes/vaults will be staged up to every 900 feet as limited by maximum pull lengths and conductor will be staged at each pull box.

Lowering In, Padding, and Backfilling (Underground)

A bucket truck or hand method will be used to lower the conduit into the trench. In rocky areas, the trench will be padded with sand or soil. After the pipe is placed in the trench and vaults have been installed, the conductors will be strung through the conduit. Once the conductors have been installed, a motor grader or dozer will be used to backfill the trench. Excavated material that cannot be placed in the trench will be disposed of in compliance with landowner and agency requirements. In steeply sloping areas, trench breakers will be installed within the trench to prevent subsurface erosion along the buried distribution line. Upon completion of this task, graded areas will be restored to original contours and reseeded.

Construction Yards

The yards will serve as field offices, reporting locations for workers, parking space for vehicles and equipment, sites for material storage, and stations for equipment maintenance. The construction contractor will have the responsibility to coordinate the construction and approval of the yards when needed.

RMP will utilize, to the extent practicable, existing substation yards for construction staging areas. Other staging areas on private lands may be required, and will be coordinated by the construction contractor with the landowner in advance of construction.

MONITORING AND RESOURCE PROTECTION PLAN

Chain-of-Command

A chain-of-command protocol for project construction activities will be agreed upon by RMP and BLM during the pre-construction meeting to avoid communication issues. The BLM authorized officer whom is the BLM compliance specialist in the field and the RMP project manager (project manager) will be the main points of contact for the communication of any concerns or discussions regarding the project. In the absence of the BLM compliance specialist, contact should be made to the Project Manager of Realty. Any problems reported to the project manager by the authorized officer, inspectors, the public, or other sources will be communicated to the construction contractor. There would be regular communication between the project manager and the authorized officer so that both are aware of the project status as it relates to the permit. BLM will require a weekly meeting of the Operator, construction contractor project management personnel, safety personnel and BLM compliance and realty personnel. Compliance specialist will be supplied weekly with a written progress and status report. If the authorized officer has concerns about the

construction practices or techniques of the construction contractor, the comments will be directed to the project manager who will take corrective action as needed. If those concerns are not resolved in discussions between the authorized officer and the project manager, then a meeting will be set up with the authorized officer, the project manager, and the construction contractor to resolve those issues.

If the authorized officer has a complaint or comment about the construction practices or techniques of the contractor, the comment will be directed to the project manager. If the problem is not resolved, the project manager will direct the contractor in such a way to resolve the issue.

RMP will provide an environmental compliance (EC) monitor during project construction. The EC will report directly to the BLM Compliance Specialist and shall have the authority to act upon, and implement, instructions from the BLM Compliance Specialist. A pre-construction meeting will be held to coordinate specific BLM requirements prior to initiation of construction activities.

Periodic Review

This plan will be reviewed periodically and, by mutual consent of RMP and BLM, and will be modified to reflect changed conditions.

Cultural Resources and Paleontology

Cultural and paleontological resources information is available for portions of the project area. Additional cultural resources surveys will be conducted prior to grant approval and release of the Decision Record and Finding of No Significant Impact (FONSI). If cultural or paleontological resources are identified, a monitoring plan will be prepared for the project. Additionally, a discovery plan should be developed and submitted to the proper BLM officer prior to construction.

Biological Resources

Based on existing biological data, plant and animal species protected under the Endangered Species Act (ESA), and BLM sensitive plant and animal species are potentially present within the project area. Seasonal stipulations and mitigation measures to protect sensitive biological resources are provided in the BLM PFO Resource Management Plan (2008). The most effective mitigation measure is to avoid disturbances at critical times related to nesting and breeding. Based on BLM wildlife distribution maps, BLM survey data and additional biological surveys, the 25 kV distribution line is located within one mile of raptor nests and within two miles of greater sage-grouse leks. Construction may require timing stipulations for raptor nesting and greater sage-grouse leks and nesting. BLM PFO wildlife stipulation measures that may apply to the project area are provided in Table 4. The anticipated construction periods for this project occur between August 16 and January 31. Specific line segments, their respective construction periods, and required seasonal wildlife stipulations will be identified during the NEPA process and contained in future versions of this POD.

TABLE 4. SEASONAL WILDLIFE STIPULATIONS FOR ALL SURFACE DISTURBING ACTIVITIES

Affected Areas	Restriction	Restricted Area
Greater Sage-Grouse Nesting Habitat	March 15 – July 15	Within 2-mile radius
Greater Sage-Grouse Leks	8pm to 8am March 1 – May 15	Within ¼ mile of an occupied lek
Ferruginous Hawk Nest	March 1 – July 31	Within 1-mile radius
Other Raptor Nests	February 1 - July 31	Within ½ mile radius

Reference: BLM. 2008. Record of Decision and Approved Pinedale Resource Management Plan.

Monitoring and Marking

Periodic monitoring by an EC will take place during construction and reclamation to assure contractor compliance to specified construction requirements as determined in the permit decision. In addition to the EC, the BLM Authorized Officer will approve changes to the resource protection program during the construction and reclamation phases as outlined in this document. If sensitive species or cultural resources are identified during pre-construction or construction activities, operations within 100 feet of the find will stop and the BLM and RMP project manager will be contacted. Activities will not resume within 100 feet of the find until BLM provides written authorization to proceed.

The EC will perform additional monitoring when construction poses a threat to identified environmental resources such as biological or cultural sites of significance to monitor work and protect identified resources. When construction of the distribution line is first initiated on federal lands, the EC will be located on-site to establish compliance to construction guidelines, protection of the resources, and avoidance of significant sites by the construction contractor. If more than one EC is needed for this additional monitoring, the operator shall provide enough EC personnel so as not to limit such personnel from surveys and actual construction monitoring.

The EC shall mark significant biological and cultural sites to protect and avoid them during construction activities. The markings will consist of wooden stakes three to four feet in height, which will have the top one-foot painted fluorescent orange or other high visibility color. Stakes will be spaced approximately 20 feet apart and will represent general avoidance areas; no distinction between biological and cultural sites will be made. Only those sites that occur within the ROW or near any possible construction activities will be marked. The marking will take place prior to construction and will be performed by the EC, with supervision from the BLM Authorized Officer. After construction is complete in an area or no longer poses a threat to the important biological and cultural resources, the stakes will promptly be removed to protect the site's location and significance from gaining unwanted attention.

Reclamation

Disturbed areas will be restored to original contours to the extent possible and reseeded as noted in the following sections. The reclamation will involve the personnel and equipment as shown in Table 3. The construction contractor, according to specifications outlined in this document, will restore lands disturbed by construction including, but not limited to: access roads, ROW, tensioning and pulling sites, structure sites, and other construction sites or storage areas. As stated previously, the upper six to ten inches of topsoil will be removed in areas where grading/blading

occurs and stockpiled separately from other grading stockpiles. Vegetation material will also be salvaged in these areas. When blading is not required but removal of vegetation is required for a safe work site, vegetation will be mowed (or similar process), leaving the root mass intact. The removed vegetation will be salvaged and spread over the area during reclamation. These materials will be replaced upon completion of construction activities. Steep slopes (e.g. generally 3:1 and greater, slopes with high erosion potential) at drainages disturbed by the project will require the installation of erosion control mats to minimize erosion. The construction contractor shall develop a Reclamation Plan, consistent with this POD and with the WY BLM Instruction Memorandum 2012-032. The construction contractor shall submit the Reclamation Plan to RMP and the BLM for BLM approval before construction is initiated.

Noxious Weed Control

The BLM “Environmental Assessment for Invasive Plant Management – Kemmerer, Pinedale, and Rock Springs Field Office(s)” (BLM 2009) contains a list of federally recognized noxious weeds that are known to occur in the project area. Efforts to reduce the spread of noxious weeds will be made during the distribution construction process. Equipment and supplies necessary for the construction and reclamation of the distribution line are possible causes of the spread of noxious weeds. Therefore, a noxious weed control strategy has been developed to minimize the spread of noxious weeds.

The following guidelines should be followed during construction and the reclamation stages of the distribution line project to control the spread of noxious weeds:

- Construction equipment, materials and vehicles should be stored at the sites where construction will occur or at specified construction yards. All personal vehicles, sanitary facilities and staging areas will be confined to a limited number of specified locations to decrease chances of incidental disturbance and spread of weeds.
- Vehicles and equipment will be washed prior to entering Sublette County to reduce the likelihood of importing noxious weed seeds. A contained lined structure will be provided and used to power wash vehicles prior to entering federal lands and riparian areas. The EC will be responsible for monitoring and issuing a sticker for the washed equipment.
- To help limit the spread and establishment of a noxious weed community within the disturbed areas, prompt establishment of the desired vegetation is required. Seeding should occur as soon as possible during the optimal period after construction. Certified “noxious weed-free” seed must be used on all areas to be seeded. Other construction material, such as fill, and best management practices (BMPs) shall also be free of noxious weed seed.

Seed Specifications

All seed used will meet all the requirements of the Federal Seed Act and the seed laws and noxious weed laws of Wyoming. Only “noxious weed-free” seed will be utilized. If requested, evidence of seed certification will be provided to the Authorized Officer. The seed must also be applicable to the geographic and topographic characteristics of the specific area to be seeded.

The seed mix, application, and seed concentration are outlined in Table 5. The actual seed mix applied may depend on the availability of seed. The Authorized Officer will approve any changes to

the seed mix outlined in Table 5. If the reclamation with native seed mix is determined to be unsuccessful by the BLM AO after two seeding attempts, a non-native seed mix may be required to revegetate the site. A non-native seed mix will be provided in a future version of this report and will require BLM authorization before use.

TABLE 5. SEED MIXTURES FOR RECLAMATION OF CONSTRUCTION ACTIVITIES

Species	Application Method	Percent Seed Mix Composition ¹	Pounds/Acre
Shrub Steppe Habitat Zone			
<i>Artemisia tridentata</i> spp. <i>wyomingensis</i> (Wyoming big sagebrush)	Broadcast	10	0.40
<i>Elymus trachycaulus</i> (slender wheatgrass)	Broadcast	10	2.40
<i>Elymus lanceolatus</i> (thickspike wheatgrass)	Broadcast	20	4.80
<i>Poa secunda</i> (Sandberg bluegrass)	Broadcast	20	1.60
<i>Achnatherum hymenoides</i> (Indian ricegrass)	Broadcast	30	7.20
<i>Achillea millefolium</i> L. var. <i>occidentalis</i> (western yarrow)	Broadcast	10	0.10
<i>Linum lewisii</i> (prairie flax)	Broadcast	10	0.60
Riparian and Wetland Habitat Zones			
<i>Ribes aureum</i> (golden currant)	Broadcast	5	0.60
<i>Elymus trachycaulus</i> (slender wheatgrass)	Broadcast	20	2.40
<i>Deschampsia caespitosa</i> (tufted hairgrass)	Broadcast	20	0.60
<i>Poa canbyi</i> (Canby's bluegrass)	Broadcast	20	0.40
<i>Elymus cinneus</i> (basin wildrye)	Broadcast	30	3.60
<i>Vicia americana</i> (American vetch)	Broadcast	5	2.00

Note: Quantities of each species seed per acre should be calculated by multiplying pounds per acre by the percent seed mix composition.

Seedbed Preparation

Seedbed preparation pertains to the preparation of the surface of the ground to receive the seed. Prior to seedbed preparation the construction contractor will clean the surface to be free from foreign materials (e.g., garbage, paper, construction debris, etc.), but all rocks, limbs, or minor woody debris should be left in place. Seedbed preparation will be performed by the construction contractor or their reclamation subcontractor immediately prior to seeding.

The topsoil layer will be roughened prior to the application of seed by using a standard disk or spring bar harrow under the proper soil moisture conditions to achieve the desired surface texture. Dirt clods and chiseled voids will provide micro-sites for seed establishment and increase surface area for water collection. The soil should be disked/harrowed to a maximum of two inches in depth and when soil moisture will allow the surface to remain as a rough texture, with clods approximately two to four inches in diameter.

In areas that already have the soil characteristics desired after construction, seedbed preparations would not be performed. The Authorized Officer may review and approve the results of the seedbed preparations prior to the seed application if desired.

Seed Application

The construction contractor or their reclamation subcontractor shall seed disturbed and prepared areas will occur after construction activities have ceased in the area. The best time to seed is in the fall (September to November). If fall seeding cannot be done, spring seeding should take place between March and May, as conditions dictate. The seed mix will be broadcast on the disturbed area, after seedbed preparations are complete. After broadcasting on BLM lands, the seed will be lightly harrowed or raked into the ground. Seeding will not take place when wind velocities exceed that necessary to ensure uniform application of the seed mix. The seed used shall meet the criteria outlined in Table 6.

TABLE 6. SEED MIX APPLICATION CRITERIA

Category	Criteria
Purity	98.0% minimum
Germination	84.0% minimum
Weed Content	0.0% maximum

If the seed does not germinate and establish vegetation acceptable by the BLM AO after two growing seasons, the contractor will reseed the area or take other reclamation actions, until the success criteria is met. If the reclamation with native seed mix is determined to be unsuccessful by the BLM AO after two seeding attempts, a non-native seed mix may be required to revegetate the site. A non-native seed mix will be provided in a future version of this report and will require BLM authorization before use.

Success Criteria

Success criteria will be based on a qualitative assessment (conducted by EC and approved by BLM) of reclaimed areas and adjacent undisturbed habitat. The level of vegetation required to meet the success criteria for reclamation will be site specific based on the amount of vegetation present in adjacent undisturbed areas and quality of topsoil. In all disturbed areas, invasive species shall account for less than 10 percent of the vegetative cover present to be considered successful.

Best Management Practices Summary

The following lists contain the BMPs to be implemented during construction to minimize impacts to protected resources.

Cultural and Paleontological Resources

- A discovery and mitigation plan should be developed and submitted to the appropriate BLM Officer to avert impacts should archaeological materials, buried remains or paleontological remains be unexpectedly discovered as a result of exposure during ground disturbance from project development, and to uphold avoidance and mitigation for the significant sites or locales

that have been already identified. These plans may include requirements for an archaeological/paleontological monitor in sensitive areas where ground disturbance may take place adjacent to known cultural resource sites or in areas with potential for archaeologically sensitive soil deposition or paleontological locales and bedrock outcrops. Should any subsurface or otherwise previously obscured archaeological/paleontological materials be discovered by archaeological/paleontological monitors or construction personnel anywhere within the project area, the BLM is to be notified immediately and work in the area of the discovery cease until the BLM or a qualified and BLM-directed archaeologist/paleontologist can assess the discovery, determine its significance, and make additional recommendations.

- No structures or disturbance would be permitted on portions of NRHP-Eligible archaeological sites that contribute to site significance or significant paleontological locales; distribution lines would span or bypass such sites, and project traffic and blading would be routed or placed away from or around them. Any portion of an NRHP-Eligible site or paleontological locale not contributing to site significance and proposed for structure placement or disturbance would require the appropriate level of testing, review, and agency concurrence within a mitigation plan prior to project actions being decided or approved at the site.
- Worker Instruction. Construction personnel should be instructed about the types of cultural materials and vertebrate fossils they could encounter and the steps to take if they uncover cultural materials or vertebrate fossils anywhere during construction of the project. Instruction will be the responsibility of the project proponent and should emphasize the non-renewable nature of cultural and paleontological resources, and that collection or excavation of cultural and vertebrate fossil materials from Federal lands without a Federal Permit is illegal, as is the disposal of cultural material or vertebrate fossils to avoid dealing with or documenting them.
- Discovery Contingency. Contingencies should be implemented in the event that significant cultural remains or fossils are discovered during ground disturbing activities. Usually construction activities that could adversely affect discovered cultural remains or vertebrate fossils are redirected until a qualified paleontologist or archeologist has determined the importance of the uncovered material, and determined the extent of the cultural site or fossiliferous deposits. A permitted paleontologist/archeologist will then advise the appropriate BLM officer and with their input will determine and implement recommendations regarding further mitigation, if any is warranted.
- Monitoring. Areas that hold a high probability for preserving cultural remains as suggested by prior cultural inventory work will be monitored during any construction by a qualified archaeologist. Only areas underlain by surface exposures of Unit 2 of the Wasatch Formation along the north and east side of Blue Rim and one area underlain by Unit 3 of the Wasatch Formation, which field survey revealed produce vertebrate fossils should be monitored during surface disturbance and should be monitored by a permitted paleontologist.
- Curation of Specimens. Cultural remains will be curated at the University of Wyoming curation facility. Fossil specimens of scientific significance recovered, if any, during the project should be curated into the collections of a museum repository acceptable to the land management agencies involved with the Pinedale Transmission Project. The Departmental Collections of the Geology and Geophysics Department at the University of Wyoming is the curation facility recommended. Specimens should be prepared to the point of identification, identified, and catalogued into the permanent collections of an established institution.

Biological Resources

- Existing access roads and two-tracks would be used to gain access to the ROW and to move construction equipment to the area. For structures not immediately adjacent to existing roads, the construction contractor would travel overland within the authorized ROW from the nearest existing access road. Where this is not practicable, proposed construction off-ROW access routes will be identified and approved by BLM prior to construction. Upland routes would be used as feasible if overland tracking is needed to access pole locations in the New Fork riparian area.
- Outside of the trench areas, grading and vegetation removal would be implemented only as needed to gain access to the work sites and establish a safe working environment at the pole structures. Any grading required on overland routes would be coordinated with BLM and grading will not commence without BLM approval. All construction requirements will be adhered to such as the 4 inch rut saturated soils limitations, open hole stipulations and other necessary construction techniques as required by compliance personnel.
- Any grading required on overland routes would be coordinated with BLM and grading will not commence without BLM approval.
- In areas where grading is required, vegetation and the upper six to ten inches of soil would be bladed and stockpiled separately from any spoil. After line construction, disturbed areas would be graded to blend as near as possible with the natural contours, the upper six to ten inches of soil and vegetative material would be replaced and reseeded as necessary.
- All areas disturbed would be reclaimed in accordance to agency requirements and the Reclamation Plan.
- Construction equipment would be thoroughly washed prior to entering Sublette County. Reclamation would occur in accordance to agency requirements, information contained within this POD, and the Reclamation Plan.
- All seed mix, erosion control materials, and reclamation materials will be certified weed free.
- Monitor reclamation efforts and control invasive species after construction and reclamation work is completed. The BLM and Sublette County Weed and Pest Control would be consulted to determine treatment for noxious weeds, if identified.
- All surface-disturbing activity would be seasonally restricted from February 1 through August 15 within a 0.5-mile radius of all active raptor nests. An active raptor nest is defined as a nest that has been occupied within the past 3 years.
- All surface-disturbing activity would be seasonally restricted from March 1 through July 31 within a 1-mile radius of all active ferruginous hawk nests. An active ferruginous hawk nest is defined as a nest that has been occupied within the past 3 years.
- Surface disturbing or human activities would not be allowed between November 1 and April 1 within one mile of known bald eagle winter use areas.
- All surface-disturbing or human activity would be seasonally restricted from February 1 through August 15 within 1.0 mile of all active bald eagle nests. An active eagle nest is one that has been occupied once in the past 5 years.

- Permanent structures requiring repeated human presence would not be permitted within active raptor nests no surface occupancy (NSO) zone.
- Surface disturbing and disruptive activities would be prohibited in suitable sage-grouse nesting and early brood-rearing habitat within two miles of an occupied lek, or in identified sage-grouse nesting and early brood-rearing habitat outside the 2-mile buffer, from March 15 to July 15.
- Surface disturbing and disruptive activities would be prohibited within 0.25 mile of an occupied lek from 8 p.m. to 8 a.m. from March 1 to May 15.
- Surface disturbing and disruptive activities would be prohibited within sage-grouse winter concentration areas from November 15 to March 15.
- Surface disturbing activity in mountain plover habitat between April 10 and July 10, requires presence/absence surveys. Survey results would determine when activities would be permitted.
- Surface disturbing and disruptive activity would be prohibited within 0.5 mile of occupied burrowing owl nest from April 1 through August 15. Surveys may be required to determine nesting status.
- Activities and facilities that create barriers to the seasonal movements of big game would be avoided.
- All overhead lines would be required to be constructed using a perch minimizing design, including pole caps.
- Activities or surface use would not be allowed from November 15 to April 30 within moose crucial winter habitat.
- Activities or surface use would not be allowed from February 1 to April 30 within antelope crucial winter habitat. Work conducted between November 15 and January 31 will require a written exception request approval provided by BLM biologists prior to commencing construction during this period.
- Erosion control measures developed in the project Stormwater Pollution Protection Plan would prevent sediment from leaving the project work area.
- The top layer of substrate would be removed and stockpiled separately for any buried lines that would cross intermittent streams. The top layer of substrate would be placed as the final grade material and would not be mixed with ditch spoil or other excavated material. Reclamation would include bank stabilization and reseeding of disturbed areas.
- Refueling activities shall take place at least 100 feet away from rivers, streams (including intermittent and perennial), and wetlands (including dry or seasonal wetlands).
- No equipment will enter water bodies and use of felt-soled shoes to wade the river, if necessary, would not be allowed. No equipment will enter any sensitive areas without proper power washing and monitoring.
- Vegetation removal would be minimized and conducted in accordance with RMP's Vegetation Management Specification Manual; overland travel would be implemented to the extent feasible and within engineering constraints while considering a safe work environment for workers.

- No underground power line crossings are proposed for perennial water courses or areas with an overhead riparian canopy. The top layer of substrate would be removed and stockpiled separately for any buried lines that would cross intermittent streams. The top layer of substrate would be placed as the final grade material and would not be mixed with ditch spoil or other excavated material. Reclamation would include bank stabilization and reseeding of disturbed areas.
- Open holes will be properly guarded.
- Wetland areas would be identified and marked by the environmental compliance contractor prior to construction. A preconstruction walkthrough would be conducted with the construction contractor by a trained wetland biologist to identify area that will need special care for access (wetlands) and construction protocol if areas cannot be avoided. The construction contractor will be responsible that all construction staff and subcontractors are aware of wetland habitats and impact avoidance requirements identified during the walkthrough.
- A post construction walkthrough would be done to make sure any disturbed wetland soils have been restored and appropriate wetland seed mix is applied to these areas.

Human Health and Environment

- Maintenance of construction equipment in good operating condition to ensure engines run efficiently.
- Maintenance of emission controls on vehicles and construction equipment to ensure effective pollutant emission reductions.

OPERATION AND MAINTENANCE

Operation

The nominal voltage for the project will be 25 kV alternating current (AC). There could be minor variations of up to 5 percent above the nominal level depending upon load flow.

When the distribution line has been energized, land uses that are compatible with safety regulations may be permitted in and adjacent to the ROW. In previous projects, existing land uses such as agriculture and grazing generally have been permitted within the ROW. Incompatible land uses within electrical ROW's include construction and maintenance of inhabited dwellings and any use requiring changes in surface elevation that will compromise required conductor clearances of existing or planned facilities. BLM retains the authority for permitting all activities within the granted ROW on land under BLM jurisdiction.

Land uses that comply with local regulations will be permitted adjacent to the ROW. Compatible uses of the ROW on public lands will require BLM approval.

Safety is a primary concern in the design of distribution systems. The AC distribution line will be protected with power circuit breakers and related line relay protection equipment. If conductor failure were to occur, power would be automatically removed from the line.

Maintenance

The line will be inspected on a scheduled basis by ground surveys, and maintenance will be performed as needed. When access will be required for non-emergency maintenance and repairs, the maintenance crews would adhere to the same precautions taken during the original construction.

Non-emergency activities would include continued maintenance of the ROW to keep the line clear of any obstructions. Emergency maintenance would involve prompt dispatch of repair crews to repair or replace any damage to the line. The emergency work will be conducted prior to contacting BLM if necessary. Crews would be instructed to protect crops, plants, wildlife and other resources of significance. Significant sites that are avoided and monitored during construction will be taken into consideration when maintenance crews are working. These site locations will be current on updated maps for the project. Activities will be performed in a similar manner to original construction guidelines as outlined in this plan. When maintenance and/or access routes cause damage to existing resources or roads, restoration procedures will be similar to those prescribed for normal construction. The comfort and safety of local residents is a primary concern during construction and maintenance activities. Noise, dust and the danger presented by maintenance vehicle traffic would be limited to the extent possible.

Equipment used for maintenance activities on the distribution line is dependent upon the type of maintenance required. Equipment that can be anticipated for maintenance activities would likely not differ from equipment needed for general construction of the line.

REFERENCES

- BLM (US Bureau of Land Management). 2009. Environmental Assessment – WY-090-EA09-52; Invasive Plant Management – Kemmerer, Pinedale, and Rock Springs Field Office(s). January 30, 2009. Accessed January 11, 2010.
<http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/hddo.Par.9512.File.dat/HD-IPM-EA.pdf>
- U.S. Bureau of Land Management (BLM). 2008. Record of Decision and Approved Pinedale Resource Management Plan for Lands Administered by the Bureau of Land Management – Appendix 3, Mitigation Guidelines and Operating Standards Applied to Surface Disturbing and Disruptive Activities, Pinedale Field Office Pinedale, Wyoming. November 2008. Accessed August 19, 2009:
http://www.blm.gov/rmp/wy/pinedale/documents/AEIS/Appendix/Appendix03_MitigationGuidelinesandOperatingStandards.pdf

LIMITATIONS

GeoEngineers has completed this Plan of Development Report for the Anticline Electrification 25 kV Distribution Lines Project in general accordance with the scope and limitations of our proposal. Within the limitations of scope, schedule and budget, our services have been executed in accordance with the generally accepted practices for Plan of Development preparation in this

area at the time this report was prepared. No warranty or other conditions, express or implied, should be understood.

This report has been prepared for the exclusive use of RMP, their authorized agents and regulatory agencies based on information available at the time of the work. No other party may rely on the product of our services unless we agree in advance to such reliance in writing. The information contained herein should not be applied for any purpose or project except the one originally contemplated.

Map Revised: October 6, 2011

Office: TACO Path: C:\Anticline25kv_POD10_Fig1



Legend

-  Segment 10 Overhead
-  Segment 10 Underground

Reference: Aerial Imagery with labels from Microsoft Bing Maps.



Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Vicinity Map - Segment 10 Anticline 25 kV Distribution	
Rocky Mountain Power Sublette County, Wyoming	
	Figure 1

Map Revised: October 6, 2011 smm

Office: TACO Path: C:\Anticline25kv_POD10_Fig2



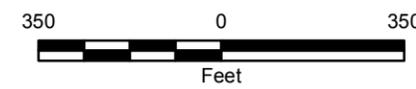
Legend

- Segment 10 - Ultra SWD (OH)
- - - Segment 10 - Ultra SWD (UG)

Reference: 2009 NAIP Imagery from US Department of Agriculture.

Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.



Site Plan - Segment 10 Anticline 25 kV Distribution	
Rocky Mountain Power Sublette County, Wyoming	
	Figure 2



May be used
In raptor areas



NOT TO SCALE

Reference: Image obtained from Rocky Mountain Power

Notes:

- 1. The locations of all features shown are approximate.
- 2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

**25kV Single Circuit Wood Pole
Distribution Structure Detail**

Rocky Mountain Power
Anticline 25 kV Distribution Project
Sublette County, Wyoming



Figure 3